



North Norfolk Local Plan Examination

Schedule of Representations (Further Consultation)

January 2025

BLANK

Schedule of Representations (Further Consultation)

Introduction

This document sets out the representations *as made* by respondents during the public consultation on the North Norfolk Local Plan Further Consultation, which took place between 7 November and 19 December 2024. In total 492 representations were received from 325 respondents. This document also includes an officer summary and council's response to the comments made.

This report is arranged in section order. You can navigate to specific sections using the Bookmarks menu. If not visible this can be added by selecting: View > Show/Hide > Navigation Panes > Bookmarks

Prescribed Consultation Response Form

The formal consultation response form prescribed key questions seeking specific views in relation to the **Proposed Changes** and **Appendices** contained within the Further Consultation document. This followed standard practice and was necessary in order to encourage and enable feedback of the relevant information required by the inspector for consideration through the ongoing examination. The response form sought the completion of a separate response form for each Proposed Change within the document. Guidance and support was provided in order to assist those wishing to respond.

A proportion of the responses received were not made using the prescribed consultation response form and were received in other formats, such as via email or letter. Many of these responses were not clearly defined, were related to multiple topic areas, or related to other documents which were not the focus of this consultation. In order to prepare this report, the Council undertook an exercise to split such comments and/or append them to the relevant section of the document.

Blank Fields

There are two main reasons for blank fields within this report:

- A response to the question was not provided (including in responses sent as letters or emails).
- Personal contact details have been withheld for privacy reasons.

Attachments

In many cases the representation was provided as an attachment, rather than using the prescribed consultation response form. Where attachments have been submitted these are highlighted '**SEE ATTACHED FILE**' and are available to view via a web link.

The original consultation responses can be viewed in full on the [Consultation Portal](https://consult.north-norfolk.gov.uk)¹. All consultation and other supporting documents can be viewed in the [Examination Library](http://www.north-norfolk.gov.uk/localplanexamination)².

¹ <https://consult.north-norfolk.gov.uk>

² www.north-norfolk.gov.uk/localplanexamination

BLANK

Local Plan Further Consultation: Schedule of Representations (Proposed Change 1-9)

Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)

Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC5
Response Date	08/11/2024 16:00:26
Full Name	Mr Mark Trimmer
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am writing to express my strong opposition to the proposed land for housing development in our neighborhood. While I understand the need for housing set out by the government, I believe that this project would have a detrimental impact on our community.</p> <p>First and foremost, the proposed development is simply too large for our area. The increase in population density would put a strain on our already overburdened infrastructure, leading to increased traffic congestion, noise pollution, and strain on our public services. Additionally, the construction of this project would result in significant environmental damage, destroying natural habitats and putting wildlife at risk. Furthermore, the site would have to cross a bridlepath to access the site.</p> <p>This site has undergone several attempts to gain access to build and each time found not suitable for all the reasons above and more.</p> <p>I urge you not to consider this site as this amount of housing could be included in other sites.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: I believe that this project would have a detrimental impact on our community.</p> <ul style="list-style-type: none"> the proposed development is simply too large for our area the increase in population density would put a strain on our already overburdened infrastructure, leading to increased traffic congestion, noise pollution, and strain on our public services. the construction of this project would result in significant environmental damage, destroying natural habitats and putting wildlife at risk. Furthermore, the site would have to cross a bridlepath to access the site. I urge you not to consider this site as this amount of housing could be included in other sites.
Officer Response	<p>Comments noted. In developing the policy approach consideration has been given to the appropriate scale and layout. The scale is considered proportionate and reflective of the surroundings.</p> <p>The proposed allocation is restricted through policy to approximately 70 dwellings in a defined area and the policy requires the delivery of at least 5.3 ha of multi-functional open space to be managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology.</p> <p>Cromer is identified as a Large Growth Town in Policy SS1 and as such is where a high proportion of new housing will be located. Locations such as these have primary, secondary education, healthcare facilities and large town centres which coupled with the extensive choice of convenience and comparison good shopping, good public transport and being the focus for commercial and employment investment perform a strong role as service centres</p>

	<p>and employment providers. As such the identified Large Growth Towns remain the most sustainable settlements and locations where growth should be directed.</p> <p>The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC11
Response Date	11/11/2024 11:18:50
Full Name	Mr Christopher Smith
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	I have been using this area to walk my dog for over twenty years now, It is a well used and a much loved open space adjoining Cromer, abounding with natural beauty and wildlife. To lose this would be a great loss to all who live near it, and have a detrimental effect on the wildlife we are all obliged to protect.
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: It is a well used and a much loved open space adjoining Cromer, abounding with natural beauty and wildlife. To lose this would be a great loss to all who live near it, and have a detrimental effect on the wildlife we are all obliged to protect
Officer Response	Comments noted. The site allocation includes the identification of a large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology. Further open land remains adjacent to the proposed site including wider local access to the coast.
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC22
Response Date	22/11/2024 09:40:02
Full Name	Mr Mark Allbrook
Organisation	Chair Cromer Green Spaces
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILES</p> <p>Cromer Green Spaces is concerned that the development of the Land at Runton Road does not contribute to the overall soundness of the plan. Our concern relates principally to the destruction of a large wildlife friendly natural space and attached are three documents which support this contention; a bird survey (2019) and two habitat surveys (2022 and 2024). All three emphasize the importance of the site for wildlife. Moreover, we are concerned about the impact on the wellbeing of the local inhabitants who are frequently visible walking the site, exercising dogs, watching birds or simply enjoying the outdoors. Access via public footpaths would be lost and the immense value of an open green space between Cromer and East Runton would be lost. It is our belief that the development of the land to the west</p>

	of Pine Tree Farm (C22/4) would be preferable for three reasons: far less impact upon the natural world, no impact on the townfolk of Cromer and it would provide many more houses.
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	Runton Gap Report for NNDC.docx Survey Bob Crook.pdf Survey Bob Leaney.pdf
Officer Summary	Object: The development of the Land at Runton Road does not contribute to the overall soundness of the plan. Our concern relates principally to the destruction of a large wildlife friendly natural space and attached are three documents which support this contention; a bird survey (2019) and two habitat surveys (2022 and 2024). All three emphasize the importance of the site for wildlife. Moreover, we are concerned about the impact on the wellbeing of the local inhabitants who are frequently visible walking the site, exercising dogs, watching birds or simply enjoying the outdoors. Access via public footpaths would be lost and the immense value of an open green space between Cromer and East Runton would be lost. It is our belief that the development of the land to the west of Pine Tree Farm (C22/4) would be preferable for three reasons: far less impact upon the natural world, no impact on the townfolk of Cromer and it would provide many more houses
Officer Response	<p>Comments noted. The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. Residential development is proposed to be at the front of the site away from the majority of the existing scrubland. Further open land remains adjacent to the proposed site including wider local access to the coast.</p> <p>It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation and agreed that the open space elements of the site as the accompanied documents suggest would benefit from management to improve attractiveness and species richness.</p> <p>The species lists attached are unverified and relates to a point(s) in time in 2019 / 2022 which can not be relied upon not least because the nature of the site has since changed. it should be noted that the assessment provided is in relation to only part of the proposed allocation which includes the retention and enhancement of greater areas of open space to the west. The proposal also restricts development to the front section of the site and reduce the development impacts on the areas of existing Scrubland. Any application would be subject to policy compliance around open space/green infrastructure, biodiversity net gain etc.</p> <p>Support for proposed change 2 and site C22/4 is welcomed</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC35
Response Date	18/11/2024 11:09:05
Full Name	Mrs Teresa Cole
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILES</p> <ul style="list-style-type: none"> The proposed site is not a 'new' site allocation as it has been put forward several times in the past and rejected following public consultations after receiving the highest number of representations from the local community and being the least favoured site for development for all the reasons previously presented. This site has been rejected in the past as being within an area of high landscape value up to the long established development boundary with several other reasons quoted as: development would constitute a significant residential encroachment into open

	<p>countryside; it is an area designated as undeveloped coast and of high landscape value.; development would result in a loss of open rural character and undermine an important gap between settlements to the detriment of the visual amenities of the area.</p> <ul style="list-style-type: none"> • The land is an important buffer and forms the historic 'gap' which is a key character of the coast road between Cromer Town and East Runton Village. It is part of the setting of the area which is as important now as it has always been since the town and village were formed. The gap has always been considered by the community as a peaceful, rural and idyllic part of the village/town to be kept clear. It captures what makes the area special. • Original housing number was quoted as 55 dwellings following representations last year, and is now showing an increased build of 70 dwellings. There are obvious concerns that there will be inevitable pressure in the future to fully develop this site far beyond the allocation now presented as by then the historic 'gap' will be gone and much of mosaic of native scrub and acid grassland (as identified by the Wildlife Trust) on the specific area of land showing for development, will have been destroyed. • Any development will result in a significant detrimental effect on the ecological interests of the site. The land is worthy of 'special' wildlife interest, and does meet the criteria for a County Wildlife site. It plays an important role for biodiversity as a piece of undeveloped land along the coast and provides an important connectivity between the coast and habitats inland. The land is used by migratory birds with a siting just this month of a Siberian Stonechat, a rare visitor to these shores. • The area for development sits opposite and in the middle of several holiday caravan parks, holiday lets and campsites, as well as the Runton field which is used for the traditional carnival, fair and circus activities each year. The area has few employment opportunities. People do not move to the area for work as mainly seem as a tourist town/village and much of the housing in the area subsequently becomes expensive 'holiday' and 'second' homes, having little impact on the actual local housing needs in the area. The majority of incomers will be retirees (as can be seen by the current Clifton Park age statistics) which will add to the waiting lists of the already pressured GP and dental surgeries in the area. • Concerns regarding 'provision of convenient and safe vehicular access from either Runton road and/or adjacent Clifton Park development'. This will be extremely dangerous as there is a holiday park site which is located directly opposite this site at the junction of Clifton Park; the Runton Road public entrance is also opposite the junction and as well as having a public footpath which now links to the Clifton Park public footpath and gives access to the large carnival field that is entrance for thousands of visitors in the summer; the Runton Road is an extremely busy road with a large number of camper vans travelling to the various parks that line this road as well as people regularly travelling this route to access the many holiday boot sales that occur several times a week from Spring – Autumn and are well attended by both local and holiday visitors. This vehicular access point will make it extremely difficult and dangerous to use this part of the Runton Road, that offers no other alternative for those needing to access the various holiday parks directly opposite and near the site.
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	View to Runton Road - grasses.JPG northern view to caravan park - june 24.JPG Runton Gap land.JPG
Officer Summary	<p>Object: The Site has been put forward several times in the past and rejected following public consultations after receiving the highest number of representations from the local community and being the least favoured site for development.</p> <p>Development would constitute a significant residential encroachment into open countryside; it is an area designated as undeveloped coast and of high landscape value.; development would result in a loss of open rural character and undermine an important gap between settlements to the detriment of the visual amenities of the area. The land is an important buffer and forms the historic 'gap' which is a key character of the coast road between Cromer Town and East Runton Village. The gap has always been considered by the community as a peaceful, rural and idyllic part of the village/town to be kept clear. It captures what makes</p>

	<p>the area special. There are obvious concerns that there will be inevitable pressure in the future to fully develop this site far beyond the allocation now presented.</p> <p>Any development will result in a significant detrimental effect on the ecological interests of the site. The land is worthy of 'special' wildlife interest, and does meet the criteria for a County Wildlife site.</p> <p>The area for development sits opposite and in the middle of several holiday caravan parks, holiday lets and campsites, as well as the Runton field which is used for the traditional carnival, fair and circus activities each year. The area has few employment opportunities. People do not move to the area for work as mainly seem as a tourist town/village and much of the housing in the area subsequently becomes expensive 'holiday' and 'second' homes, having little impact on the actual local housing needs in the area. The majority of incomers will be retirees (as can be seen by the current Clifton Park age statistics) which will add to the waiting lists of the already pressured GP and dental surgeries in the area.</p> <p>Concerns regarding 'provision of convenient and safe vehicular access from either Runton road and/or adjacent Clifton Park development'. This will be extremely dangerous as there is a holiday park site which is located directly opposite this site at the junction of Clifton Park.</p>
Officer Response	<p>Comments noted: The site was considered suitable for development as part of the regulation 18 Plan making stage but was not taken forward at the time as it was in part not needed to meet the then identified needs and there were more favoured sites.</p> <p>The site does not form part of any designated gap or buffer. Large parts of the land between Cromer and East Runton referred to is already developed and adjacent to the site lies the Seacroft Caravan and Motorhome camp site, various outbuildings. Other residential development lies adjacent to the site to the east and as noted there are various other large scale caravans in the immediate vicinity that remain prominent in the wider Landscape. The wider and adjacent landscape also accommodates residential housing, most of which is appropriately screened. The site is not designated as a CWS and further open land remains adjacent to the proposed site including wider local access to the coast.</p> <p>The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the Districts existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in Policy SS1 and as such is where a high proportion of new housing will be located. Locations such as these have primary, secondary education, healthcare facilities and large town centres which coupled with the extensive choice of convenience and comparison good shopping, good public transport and being the focus for commercial end employment investment perform a strong role as service centres and employment providers. As such the identified Large Growth Towns remain the most sustainable settlements and locations where growth should be directed.</p> <p>The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation. The proposal also restricts development to the front section of the site and reduces the development impacts on the areas of existing Scrubland. Any application would be subject to policy compliance around open space/green infrastructure and biodiversity net gain.</p> <p>The assessment and proposed allocation policy has been informed in liaison with the Highways Authority and appropriate access can be achieved.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC39
Response Date	18/11/2024 16:02:00
Full Name	Mr Geoffrey Cole
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILES</p> <ul style="list-style-type: none"> The proposed allocation dwelling number following the last public consultation was for 55 dwellings and I therefore query the Inspector's response that quotes an allocation of 90 dwellings, and this consultation document that now states 70. Can the actual number be confirmed.

	<ul style="list-style-type: none"> • The current Clifton Park estate (as developed by the owners of this land in the past) ends at the border boundary of East Runton thus ensuring the ‘gap’ remained between East Runton and Cromer Town. The current borderline also includes a public footpath along the Clifton Park edge which further ensures the gap and respects a feature that contributes to its local distinctiveness. The housing development will thus create a ribbon development with the loss of the coast road ‘Runton gap’ and visually merge East Runton Village with the Cromer Town entrance, as well as making any access to the public footpath difficult and unpleasant if the area becomes a large building site, especially as vehicular access is planned from either Runton Road and/or the adjacent Clifton Park development which is the current footpath and bridlepath entrance. • I object to any planned access from the current Clifton Park development as all access points are very close to people’s homes and the level of activity for a site of at least 70 homes requiring access by lorries and contractor building traffic using these very small roads can only cause distress to local residents, many of who are elderly. • Concerns that proximity of the development to the existing sewage treatment works and railway line will give rise to potential problems of odour and noise nuisance to future occupiers of any development, and increase the unpleasant odours that it currently occur to the Clifton Park residents especially during times of increase use – i.e when caravan parks are occupied in the summer months. I therefore question whether the sewage treatment works will be able to cope with this development on their doorstep? • Increased rainfall and storms cause sewers to reach capacity and will likely increase the flooding to the Runton Road junction with Clifton Park which is downhill from this area. This has already been evident during heavy storms. This land acts as a natural sponge for the rainfall running downhill through the Clifton Park side roads and concreting over this can only increase future flood risks to the local area. • The site is a much loved community asset, as evidenced daily by hundreds of local people who use the area for walking, cycling, horse-riding, birdwatching, nature studying etc. Several footpaths and bridle paths cross the area, and often rest at the memorial bench on the hill to take advantage of the wonderful panoramic northern view from thon ‘Muckle Hill’, which gives an open landscape view across the wildlife frontage area and out to the open sea. This view is also much admired by those travelling to Cromer by train as the gap provides one of the first glimpses of the sea as it approaches Cromer Station – this will no longer be visible once a housing development blocks this unique view and therefore significantly harm the rural approach and have an adverse impact on the appearance of the area. • This housing development could mean an adverse impact on current and future ecological interests and the opportunity to preserve this wildlife site for future generations. This is particularly important when we are being told that the UK is one of the most nature depleted parts of the world, that wildlife is in catastrophic decline and has fallen by more than two thirds in less than 50 years. Surely a unique and untouched area like this should be saved for future generations to enjoy rather than wiped out.
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	<p>No</p>
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	<p>Clifton Park - access point and flooding risk.jpg Runton Road View.JPG view from runton road to south - important connectivity between coast and wildlife habitats inland.JPG</p>
<p>Officer Summary</p>	<p>Object: The proposed allocation dwelling number following the last public consultation was for 55 dwellings and I therefore query the Inspector’s response that quotes an allocation of 90 dwellings, and this consultation document that now states 70. Can the actual number be confirmed.</p> <p>The housing development will thus create a ribbon development with the loss of the coast road ‘Runton gap’ and visually merge East Runton Village with the Cromer Town entrance, as well as making any access to the public footpath difficult and unpleasant if the area becomes a large building site, especially as vehicular access is planned from either Runton Road and/or the adjacent Clifton Park development which is the current footpath and bridlepath entrance.</p> <p>Object to any planned access from the current Clifton Park development as all access points are very close to people’s homes and the level of activity for a site by lorries and contractor</p>

	<p>building traffic using these very small roads can only cause distress to local residents, many of who are elderly.</p> <p>Concerns that proximity of the development to the existing sewage treatment works and railway line will give rise to potential problems of odour and noise nuisance to future occupiers of any development, and increase the unpleasant odours that it currently occur to the Clifton Park residents especially during times of increase use – i.e when caravan parks are occupied in the summer months.</p> <p>Increased rainfall and storms cause sewers to reach capacity and will likely increase the flooding to the Runton Road junction with Clifton Park which is downhill from this area.</p> <p>The site is a much loved community asset, as evidenced daily by hundreds of local people who use the area for walking, cycling, horse-riding, birdwatching, nature studying etc. Several footpaths and bridle paths cross the area, and often rest at the memorial bench on the hill to take advantage of the wonderful panoramic northern view</p> <p>This housing development could mean an adverse impact on current and future ecological interests and the opportunity to preserve this wildlife site for future generations.</p>
Officer Response	<p>Comments noted. The site is put forward through Proposed change 1 in the consultation material for approximately 70 dwellings,</p> <p>The site does not form part of any designated gap or buffer. The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the existing biodiversity, ecology and open space as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast</p> <p>Policy includes requirements to mitigate impacts from the WRC</p> <p>The submission , approval and implementation of surface water management plan ensuring no adverse effects and increase in greenfield run off rates is required as part of the policy and application process.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC43
Response Date	19/11/2024 18:02:46
Full Name	Miss Margaret Cullen
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Remove this area from the plan. I strongly object to this area being developed. It would join up east runton and cromer. It would destroy a valuable wildlife and spoil the pleasant pedestrian route between east runton and cromer. It would be a blot on Cromer being so close to the town centre and obliterate the wonderful view presented when visitors arrive by train. There would be an increase in the traffic trying to traverse the town centre which is already plagued by long queues in the summertime particularly. Is there really such a need for additional housing? There are few good quality employment opportunities in the area which would enable homeowners to afford such properties even if they were so called affordable homes. This would mean people commuting to Norwich for work which should be discouraged due to climate change considerations. Would the affordable element really be delivered? Developers are renowned for renegeing on their promises and the council seem unable to prevent this. I believe that these homes will end up becoming yet more tourist accomodation or second homes due to the desirable setting they would be in. The residents of Clifton Park would have their quality of life severely compromised by this development both visibly and audibly. The smells from the sewage plant are quite strong and unpleasant. Would the new residents force Anglian Water to relocate their site. I don't know whether any of this constitutes a valid objection in the planning realm but to place a large housing development in such a green and prominent area very close to the town centre seems wrong and a backward step for our lovely and unique town</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No

If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: strongly object to this area being developed. It would join up East Runton and Cromer. It would destroy a valuable wildlife and spoil the pleasant pedestrian route between East Runton and Cromer. It would be a blot on Cromer being so close to the town centre and obliterate the wonderful view presented when visitors arrive by train. There would be an increase in the traffic trying to traverse the town centre which is already plagued by long queues in the summertime particularly.</p> <p>Is there really such a need for additional housing?</p> <p>There are few good quality employment opportunities in the area which would enable homeowners to afford such properties even if they were so called affordable homes. This would mean people commuting to Norwich for work which should be discouraged due to climate change considerations.</p> <p>Would the affordable element really be delivered? I believe that these homes will end up becoming yet more tourist accommodation or second homes due to the desirable setting they would be in.</p> <p>The residents of Clifton Park would have their quality of life severely compromised by this development both visibly and audibly. The smells from the sewage plant are quite strong and unpleasant.</p> <p>I don't know whether any of this constitutes a valid objection in the planning realm but to place a large housing development in such a green and prominent area very close to the town centre seems wrong and a backward step for our lovely and unique town</p>
Officer Response	<p>The site does not form part of any designated gap or buffer. The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the existing biodiversity, ecology and open space as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast. The site is adjacent to the existing built form.</p> <p>The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the Districts existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in Policy SS1 and as such is where a high proportion of new housing will be located. Locations such as these have primary, secondary education, healthcare facilities and large town centres which coupled with the extensive choice of convenience and comparison good shopping, good public transport and being the focus for commercial end employment investment perform a strong role as service centres and employment providers. As such the identified Large Growth Towns remain the most sustainable settlements and locations where growth should be directed. Development proposals would need to accord with the the councils affordable housing policies and deliver as a minimum a policy compliant amounts.</p> <p>The policy includes requirements to mitigate impacts from the WRC</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC45
Response Date	21/11/2024 17:02:27
Full Name	Julie Filmer
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I strongly object to this proposal on the following grounds:</p> <ol style="list-style-type: none"> 1 The area is a wildlife haven that provides habitats for many species of birds, animals and plants. A full environmental impact assessment should be carried out before the site is even considered. 2 The land is actively used by residents - hiking, dog walking, bird watching and for those that are housebound, enjoying the view from a window. The removal of this would impact the mental and physical health of the local population.

	<p>3 The area is a draw for holiday makers. The land is used as a pleasant cut through from the village of East Runton, Manor Farm campsite and the other holiday sites in East Runton and Cromer. It provides an attraction for tourists and adds to the ascetic appeal of Cromer.</p> <p>4 The piece of land provides a distinct boundary between East Runton and Cromer.</p> <p>5 The sewage works can often be odorous (especially in the Summer months) and a full assessment of this would need to take place before any building is considered.</p> <p>I would suggest that other sites in Cromer have fewer environmental and human implications than this site.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: The area is a wildlife haven that provides habitats for many species of birds, animals and plants. The land is actively used by residents - hiking, dog walking, bird watching and for those that are housebound, enjoying the view from a window. The area is a draw for holiday makers. The land is used as a pleasant cut through from the village of East Runton, Manor Farm campsite and the other holiday sites in East Runton and Cromer. The piece of land provides a distinct boundary between East Runton and Cromer. The sewage works can often be odorous (especially in the Summer months).</p> <p>I would suggest that other sites in Cromer have fewer environmental and human implications than this site.</p>
Officer Response	<p>Comments noted: The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the Districts existing and future identified needs for all types of development.</p> <p>The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. The proposal also restricts development to the front section of the site and reduces the development impacts on the areas of existing Scrubland. Any application would be subject to policy compliance around open space/green infrastructure and biodiversity net gain.</p> <p>The site is one of the few that falls outside any national landscape designations and remains well connected to services with convenience shopping and the town centre in walking distance.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC47
Response Date	20/11/2024 15:53:45
Full Name	Mrs Anne Trott
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	The grounds on which our representatives previously rejected this land for development were, I felt, compelling. Nothing has changed - except perhaps an even greater recognition of the vulnerability of the local habitat. Unless the need for housing in this location is unarguable (which I do not believe it is) and unless other less valuable sites cannot be found (I believe they can) the proposal must be again rejected. Any other decision would be catastrophic for the existing community.
Do you consider it necessary to participate in a public hearing session, should these be required?	No

If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	The grounds on which our representatives previously rejected this land for development were, I felt, compelling. Nothing has changed - except perhaps an even greater recognition of the vulnerability of the local habitat. Unless the need for housing in this location is unarguable (which I do not believe it is) and unless other less valuable sites cannot be found (I believe they can) the proposal must be again rejected. Any other decision would be catastrophic for the existing community.
Officer Response	Comments noted The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the Districts existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in Policy SS1 and as such is where a high proportion of new housing will be located. The identified Large Growth Towns remain the most sustainable settlements and locations where growth should be directed. The site itself is identified as suitable available and deliverable. Site assessment has followed a set methodology as set out in Background Paper 6 Development Site Selection Methodology, [examination Reference C6]
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC48
Response Date	20/11/2024 16:25:23
Full Name	Mrs Caroline Brownsell
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	I wish to oppose the following Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1). Residents of East Runton already have great difficulty in obtaining the services of Dr's and Dentists. Hospital facilities are limited to a small cottage hospital. The infrastructure is not adequate to support additional residents. This proposal will effectively join East Runton and Cromer into one residential mass in an area of what purports to be an area of outstanding natural beauty. Houses in this area will never be affordable unless you stipulate that you have to have lived in North Norfolk for 5 years before you can purchase. Please, Please reconsider this proposal
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: The infrastructure is not adequate to support additional residents, Residents of East Runton already have great difficulty in obtaining the services of Dr's and Dentists. Hospital facilities are limited to a small cottage hospital. This proposal will effectively join East Runton and Cromer into one residential mass in an area of what purports to be an area of outstanding natural beauty. Houses in this area will never be affordable unless you stipulate that you have to have lived in North Norfolk for 5 years before you can purchase. Please, Please reconsider this proposal
Officer Response	Comments noted:The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the Districts existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in Policy SS1 and as such is where a high proportion of new housing will be located. Locations such as these have primary, secondary education, healthcare facilities and large town centres which coupled with the extensive choice of convenience and comparison good shopping, good public transport and being the focus for commercial end employment investment perform a strong role as service

	<p>centres and employment providers. As such the identified Large Growth Towns remain the most sustainable settlements and locations where growth should be directed.</p> <p>The delivery of health infrastructure and education fall under the responsibilities of the relevant statutory bodies . The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning In Health Protocol which promotes a collaborative way of working between the ICB estates team and health partners, Public Health, Local Planning Authorities (LPAs), and helps ensure the impacts on health and care services from local plans and a growing population are measured, understood, mitigated, and managed appropriately by the delivery bodies.</p> <p>The site does not form part of any designated gap or buffer. The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The proposal is adjacent to the existing residential development of Cromer and would not extend the build area as described.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC54
Response Date	21/11/2024 14:36:00
Full Name	Mr Tom Fleming
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Loss of division and landscape settlement boundary between Cromer and East Runton. East Runton will look like it is part of Cromer.</p> <p>Loss of wildlife habitat, green space, trees and general rural outlook. Although this area is scrubland, it is an important wildlife habitat and green space. There are many varieties of birds and mammals that can be seen here. There are also many trees that are home to a large number of birds. Birds of prey can be seen hunting over this area. The loss of this land as a green space would be detrimental to users' mental health.</p> <p>This area is also well used by dog walkers and holidaymakers from the caravan parks. The footpaths across this land are well used day and night. I walk our two dogs on this land every day and I see many other walkers and dog walkers. I also chat to holidaymakers walking their dogs and they tell me that they would be upset to lose this land and would have to use the carnival field as an alternative. I would like to see this area retained as a designated wildlife area.</p> <p>Loss of pleasant outlook for the caravan sites and potential loss of tourism. The caravan sites will look onto a housing estate instead of a green space. This could deter holiday makers from returning to Cromer and East Runton.</p> <p>The coast road in East Runton is narrow and in one part is single track where congestion already builds at times with current traffic flow. An increase in builders' lorries and subsequent traffic for new housing and will cause gridlock for the surrounding roads.</p> <p>The properties in Clifton Park are mainly inhabited by retired people. It is a quiet residential area. The building work will cause noise and disruption for a prolonged period of time. Once building work has been completed, the traffic flow along Runton Road and Clifton Park/Howards Hill will be greatly increased. This will lead to increased pollution and noise.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: The site would result in the Loss of the division and landscape settlement boundary between Cromer and East Runton. Loss of wildlife habitat, green space, trees and general rural outlook. Although this area is scrubland, it is an important wildlife habitat and green space. The loss of this land as a green space would be detrimental to users' mental health. This area is also well used by dog walkers and holidaymakers from the caravan parks. The

	<p>footpaths across this land are well used day and night. Development could his could deter holiday makers from returning to Cromer and East Runton.</p> <p>The coast road in East Runton is narrow and in one part is single track where congestion already builds at times with current traffic flow. An increase in builders' lorries and subsequent traffic for new housing and will cause gridlock for the surrounding roads.</p> <p>The properties in Clifton Park are mainly inhabited by retired people. It is a quiet residential area. The building work will cause noise and disruption for a prolonged period of time. Once building work has been completed, the traffic flow along Runton Road and Clifton Park/Howards Hill will be greatly increased. This will lead to increased pollution and noise.</p>
Officer Response	<p>Comments noted: The site does not form part of any designated gap or buffer. The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the existing biodiversity, ecology and open space as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC55
Response Date	20/11/2024 14:57:00
Full Name	Mrs Hazel Fleming
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Loss of division and landscape settlement boundary between Cromer and East Runton. East Runton will look like it is part of Cromer.</p> <p>Loss of wildlife habitat, green space, trees and general rural outlook. Although this area is scrubland, it is an important wildlife habitat and green space. There are many varieties of birds and mammals that can be seen here. There are also many trees that are home to a large number of birds. Birds of prey can be seen hunting over this area. The loss of this land as a green space would be detrimental to users' mental health.</p> <p>This area is also well used by dog walkers and holidaymakers from the caravan parks. The footpaths across this land are well used day and night. I would like to see this area retained as a designated wildlife area.</p> <p>Loss of pleasant outlook for the caravan sites and potential loss of tourism. The caravan sites will look onto a housing estate instead of a green space. This could deter holiday makers from returning to Cromer and East Runton.</p> <p>The coast road in East Runton is narrow and in one part is single track where congestion already builds at times with current traffic flow. An increase in builders' lorries and subsequent traffic for new housing and will cause gridlock for the surrounding roads.</p> <p>The properties in Clifton Park are mainly inhabited by retired people. It is a quiet residential area. The building work will cause noise and disruption for a prolonged period of time. Once building work has been completed, the traffic flow along Runton Road and Clifton Park/Howards Hill will be greatly increased. This will lead to increased pollution and noise.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: The site would result in the Loss of the division and landscape settlement boundary between Cromer and East Runton. Loss of wildlife habitat, green space, trees and general rural outlook. Although this area is scrubland, it is an important wildlife habitat and green space. The loss of this land as a green space would be detrimental to users' mental health. This area is also well used by dog walkers and holidaymakers from the caravan parks. The</p>

	<p>footpaths across this land are well used day and night. Development could his could deter holiday makers from returning to Cromer and East Runton.</p> <p>The coast road in East Runton is narrow and in one part is single track where congestion already builds at times with current traffic flow. An increase in builders' lorries and subsequent traffic for new housing and will cause gridlock for the surrounding roads.</p> <p>The properties in Clifton Park are mainly inhabited by retired people. It is a quiet residential area. The building work will cause noise and disruption for a prolonged period of time. Once building work has been completed, the traffic flow along Runton Road and Clifton Park/Howards Hill will be greatly increased. This will lead to increased pollution and noise.</p>
Officer Response	<p>Comments noted: The site does not form part of any designated gap or buffer. The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the existing biodiversity, ecology and open space as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC65
Response Date	22/11/2024 13:29:00
Full Name	Philip Edmonds
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<ul style="list-style-type: none"> • The matters highlighted by the Central Government Inspector suggest a sad lack of understanding of our District. • Cromer was a town of just under 900 Acres it seems to have grown at the expense of Northrepps to 1152 Acres - 4.56 km . • Cromer cannot be Bypassed, and new housing is to destroy existing settlement and is bankrupting the local council because of the need for infrastructure. • Land in East Runton breaks all planning rules, Bitty Ribbon Development. • The Clifton Park land is not suitable for development in this 'Small Settlement' that caters for a large influx seasonal caravan occupiers. • The idea that N N D C should provide access to this site via Sandy Lane or Clifton Park is unacceptable , roads too narrow, 'Unwideable. • Does ? The inspector realize the huge additional expense Anglian water/Council will need to spend updating Sewers and 'The Treatment plant directly caused by an increase in housing, and septic tank 'Regs'. • It is unrealistic to expect N N D C to provide Housing without help from Central Government for 'Essential Infrastructure'.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object:</p> <ul style="list-style-type: none"> • Cromer was a town of just under 900 Acres it seems to have grown at the expense of Northrepps to 1152 Acres - 4.56 km . • Cromer cannot be Bypassed, and new housing is to destroy existing settlement and is bankrupting the local council because of the need for infrastructure. • Land in East Runton breaks all planning rules, Bitty Ribbon Development. • The Clifton Park land is not suitable for development in this 'Small Settlement' that caters for a large influx seasonal caravan occupiers. • The idea that N N D C should provide access to this site via Sandy Lane or Clifton Park is unacceptable , roads too narrow, 'Unwideable

	<ul style="list-style-type: none"> • Anglian water/Council will need to spend updating Sewers and 'The Treatment plant directly caused by an increase in housing, and septic tank 'Regs'. • It is unrealistic to expect N N D C to provide Housing without help from Central Government for 'Essential Infrastructure
Officer Response	<p>Comments noted. The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the Districts existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in Policy SS1 and as such is where a high proportion of new housing will be located. Locations such as these have primary, secondary education, healthcare facilities and large town centres which coupled with the extensive choice of convenience and comparison good shopping, good public transport and being the focus for commercial end employment investment perform a strong role as service centres and employment providers. As such the identified Large Growth Towns remain the most sustainable settlements and locations where growth should be directed.</p> <p>Once adopted the Local plan will aid other organisations to invest in appropriate services and set investment priorities</p> <p>The assessment and proposed allocation policy has been informed in liaison with the Highways Authority and appropriate access can be achieved.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC66
Response Date	20/11/2024 14:04:00
Full Name	Miss C Eccles
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I have seen the notices on the posts by the footpaths in the area by the railway bridge and around Runton Road and Clifton Park, saying that a submission of the Draft Local Plan the Council has been asked to re-consider development of 90 dwellings on the land at Runton Road/Clifton Park. For several reasons I completely object to the project.</p> <p>If 90 dwellings are built it will mean an increase of 100s more people to the area.</p> <p>We are short of GP surgeries and dentists here. There is only one GP surgery in Cromer which is already overwhelmed. Over the last 2 ½ years I've had to wait six weeks each time to see my GP when I need to make an appointment, because she's so busy and booked up. And this year has been particularly frustrating for me because of several health issues I've suddenly developed, and having to wait so long to see my GP. (I swear I'm not making this up as my friends can vouch for my health problems.)</p> <p>So surely the surgery can't cope with a lot more people.</p> <p>Also if younger families move in, where are the schools they'd need children to go to? Cromer schools are full up I've heard.</p> <p>Anyway the land is necessary for the wildlife that lives here. There is nowhere else locally for the wildlife to move to so they would suffer badly.</p> <p>I go for walks along the footpaths in this area a lot because it's so peaceful and tranquil, with a lovely view to the sea in one particular place. I often sit on the seat and calm down when I see that seascape. I don't want to see a housing estate, instead I want to see nature.</p> <p>Whenever I see some wildlife, whatever that maybe, it uplifts my spirits. It is an ideal place to walk, with or without a dog, away from the busyness and noise of the road. I often meet other walkers who need this space too for similar reasons.</p> <p>So please let us keep this rural area, as there is no other rural area nearby to get to.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	

Officer Summary	<p>Object:I have seen the notices on the posts by the footpaths in the area by the railway bridge and around Runton Road and Clifton Park, saying that a submission of the Draft Local Plan the Council has been asked to re-consider development of 90 dwellings on the land at Runton Road/Clifton Park.</p> <p>We are short of GP surgeries and dentists here. There is only one GP surgery in Cromer which is already overwhelmed.</p> <p>Also if younger families move in, where are the schools they'd need children to go to? Cromer schools are full up I've heard.</p> <p>The land is necessary for the wildlife that lives here. I go for walks along the footpaths in this area a lot because it's so peaceful and tranquil, with a lovely view to the sea...I don't want to see a housing estate, instead I want to see nature</p>
Officer Response	<p>Comments noted. The council is consulting on proposals put forward in the further consultation document. Proposed change 1 puts forward the site for residential development and open space of up to 70 dwellings. The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the Districts existing and future identified needs for all types of development.</p> <p>The delivery of health infrastructure and education fall under the responsibilities of the relevant statutory bodies . The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning In Health Protocol which promotes a collaborative way of working between the ICB estates team and health partners, Public Health, Local Planning Authorities (LPAs), and helps ensure the impacts on health and care services from local plans and a growing population are measured, understood, mitigated, and managed appropriately by the delivery bodies. The protocol presents a process describing how relevant NHS organisations, Norfolk & Suffolk County Councils, Public Health and the Norfolk and East Suffolk Local Planning Authorities jointly engage to ensure that health considerations are adequately accounted for in plan making and in planning applications and their subsequent developments so that the appropriate authorities can plan and priorities investment(s).</p> <p>The council have liaised with the education authority throughout the plan making process. The Education Authority confirm that there is capacity in the existing schools. developer contributions for school places are usually sought at application stage.</p> <p>The site allocation includes the identification of a large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the existing biodiversity, ecology and open space as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC70
Response Date	22/11/2024 16:09:00
Full Name	John & Frances Jonas
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: to the consideration of building on the land between Clifton Park & our land on the outskirts of East Runton. We are NOT nimbys!. We have encouraged & enjoyed the wild life in this open space. It is also the only view from the train, entering the approaches of Cromer</p>

	<p>Station, of the sea. The thought of 90 dwellings in such a small space between the main Runton Road & Railway line is horrendous. The impact this would make on the local area is not good. With the average home having two cars the busy Runton Road would be chaos with another junction to the estate. In the summer months queues on this part of the road is every day & most of the day, with the cliff top car park opposite.</p> <p>For a number of years this piece of land was farmed by the Buller brothers & we also grazed our hobby herd of pedigree Dexter cattle on there in the winter & spring month</p> <p>The caravan owners on the site opposite the land enjoy the view & wildlife. A nice holiday & many generations have been coming to the site, getting away from houses & businesses, & being able to enjoy the little bit of clean air.</p> <p>We, in our time, could have made applications to build a dwelling on our land for ourselves or sold it to several Property companys for a great sum but have always maintained we will not fill the gap & open spaces which help to maintain good mental health which is just as important than overpriced houses which become holiday homes !!</p>
Officer Response	<p>Comments noted: The site does not form part of any designated gap or buffer. The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the existing biodiversity, ecology and open space as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast</p> <p>The assessment and proposed allocation policy has been informed in liaison with the Highways Authority and appropriate access can be achieved.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC78
Response Date	24/11/2024 16:13:08
Full Name	Dr. Michael Trott
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>The weighty objections already registered seem to me to be compelling. And indeed it was on such grounds - and in particular unease that the coast road approaching Cromer should be further spoilt by yet more ribbon development - that this land was withdrawn from the local plan previously submitted. That it should be re-submitted so rapidly is perhaps understandable but nevertheless deeply regrettable. The very particular flora and fauna offered by this area are irreplaceable. And once they are gone the physical and emotional well-being of the residents and visitors who use this land for recreation cannot but be adversely impacted. Surely there must be other sites that can be built upon without the community having to pay such a high price?</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: in particular unease that the coast road approaching Cromer should be further spoilt by yet more ribbon development - that this land was withdrawn from the local plan previously submitted. That it should be re-submitted so rapidly is perhaps understandable but nevertheless deeply regrettable. The very particular flora and fauna offered by this area are irreplaceable. And once they are gone the physical and emotional well-being of the residents and visitors who use this land for recreation cannot but be adversely impacted. Surely there must be other sites that can be built upon without the community having to pay such a high price?</p>
Officer Response	<p>Comments noted. The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the Districts existing and future identified needs for all types of</p>

	<p>development. Cromer is identified as a Large Growth Town in Policy SS1 and as such is where a higher proportion of new housing will be located. Locations such as these have primary, secondary education, healthcare facilities and large town centres which coupled with the extensive choice of convenience and comparison good shopping, good public transport and being the focus for commercial end employment investment perform a strong role as service centres and employment providers. As such the identified Large Growth Towns remain the most sustainable settlements and locations where growth should be directed.</p> <p>The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast.</p> <p>The proposal is adjacent to the existing residential development of Cromer. The site does not form part of any designated gap or buffer</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC81
Response Date	23/11/2024 10:52:00
Full Name	John Lemmon
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>This is my objection to the proposed building development of 70 homes</p> <p>Cromer is the jewel of the Norfolk coast. I have been coming in for many years enjoying the great views across the sea walking along the seafront. Not only is it fantastic with the sunsets also the buildings which align the seafront down to East Runton are very pleasing to look at with all the different characters and old buildings. If a development of such large proportions is given the go-ahead it will have a very unsightly impact for many holidaymakers and people visiting the coastline with their walks along the front. This is no place to build an estate in between such character buildings. I am in the building game myself and I have seen the effects this does have on local communities left with the finished result. I don't believe this is in the interest of the local people as they will be pushed out of their own area also once they get the permission to build 1/2 of the green they will apply for the second half and this will be lost forever. Please consider the Beautiful North Norfolk Coast we have left, especially as we have lost so many original homes from lack of sea defences through the years.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object:I have been coming in for many years enjoying the great views across the sea walking along the seafront. Not only is it fantastic with the sunsets also the buildings which align the seafront down to East Runton are very pleasing to look at with all the different characters and old buildings. development will have a very unsightly impact for many holidaymakers and people visiting the coastline with their walks along the front.</p> <p>I don't believe this is in the interest of the local people as they will be pushed out of their own area also once they get the permission to build 1/2 of the green they will apply for the second half and this will be lost forever. Please consider the Beautiful North Norfolk Coast we have left, especially as we have lost so many original homes from lack of sea defences through the years.</p>
Officer Response	<p>Comments noted. Cromer benefits from open sea views along the full extent of its northern boundary, in developing the policy approach consideration has been given to the appropriate scale and layout. The scale is considered proportionate and reflective of the surroundings. The development site is adjacent to current built and the site allocation policy requires development to be stepped back from Runton Rd to ensure an open front to the site is retained.</p>

	The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the Districts existing and future identified needs for all types of development
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC83
Response Date	25/11/2024 15:01:41
Full Name	Mr Christopher John Bridgman
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Land at Runton Road/Clifton Park Cromer</p> <ol style="list-style-type: none"> 1 This piece of land has been wrongly described. It should read land at Runton Road, EAST RUNTON/Clifton Park CROMER 2 Yet again there is an attempt by this misnomer to pretend that this piece of land is in Cromer when it falls into the Parish of East Runton. There is even a large sign which says EAST RUNTON standing next to this field on the Runton Road. 3 This means that the land should be considered as part of the Strategy for Small Villages. Under the proposed growth changes in small growth villages 64 houses have been identified for both Runtons, this would exceed the entire allocation and would mean that no other houses could be built anywhere in the parishes. 4 When the planning inspectorate considered an appeal by Barretts Homes it identified this piece of land as a significant gap between Cromer and East Runton, siting the visibility of the houses at Wyndham Park. Allowing building here will erode the gap and blur the distinction between the two settlements. 5 Part of the character of the North Norfolk coast lies in its range of small and distinct settlements. Allowing building here risks blurring the gap between Cromer and East Runton to the detriment of the holiday trade in the whole area. People come to East Runton because it's a small coastal village, they do not come to a suburb of Cromer. The whole character of the area will be changed. 6 Regardless of the 'high quality' landscaping which would supposedly be required at the back of the site I would point out that the last time this site was suggested Anglia Water stated that they could not guarantee that there would not be odour problems on this area of the site. With this problem in mind I do not think the site is suitable for anything. 7 I note the words 'in perpetuity' in relation to the landscaping. There is no indication of how this would be achieved or monitored. If this piece of land stays in its current ownership they will just keep coming back trying to circumvent the ruling. This land should be given to the local authority so that the Clifton's no longer control it. 8 There is no indication of how the proposed landscaping would be maintained, who would be responsible for it, and would it be a burden on our taxes? 9 Norfolk County Council has recently taken on the responsibility for new footpaths across the site and it is not clear what will happen to these in the proposals 0 There is no mention of the Bridle Path which should be maintained. <p>With these considerations in mind I do not feel that building on this site in EAST RUNTON is justified, the allocation here is bigger than the allocation assigned to both villages in the plan. To allow building here in addition to the 64 homes already put forward for both villages would change the status of East Runton in the local plan. This should not be considered.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: This piece of land has been wrongly described. It should read land at Runton Road, EAST RUNTON/Clifton Park CROMER. Misnomer to pretend that this piece of land is in Cromer when it falls into the Parish of East Runton. The land should be considered as part of the Strategy for Small Villages. Land should be considered as part of the Strategy for Small Villages. - Under the proposed growth changes in small growth villages 64 houses have been identified for both Runtons, this would exceed the entire allocation and would mean that no

	<p>other houses could be built anywhere in the parishes. If this land was allocated it would change the status of East Runton as a small village and double the growth which has been allocated. Part of the character of the North Norfolk coast lies in its range of small and distinct settlements. Allowing building here risks blurring the gap between Cromer and East Runton to the detriment of the holiday trade in the whole area. This piece of land as a significant gap between Cromer and East Runton. concerns over siting the visibility of the houses at Wyndham Park. There would be odour problems on this area of the site.</p> <p>There is no indication of how the proposed landscaping would be maintained, who would be responsible for it, and would it be a burden on our taxes?. note the words 'in perpetuity' in relation to the landscaping. There is no indication of how this would be achieved or monitored. There is no mention of the Bridle Path which should be maintained.</p> <p>If this piece of land stays in its current ownership they will just keep coming back trying to circumvent the ruling. This land should be given to the local authority so that the Clifton's no longer control it.</p>
Officer Response	<p>Comments noted. Whilst located within East Runton Parish, the site is immediately adjacent to Cromer's settlement boundary and therefore relates more to Cromer than to East Runton. The operation of Policy SS1 Spatial Strategy does not relate to parish boundaries but relies upon the defined settlement boundaries for the Selected Settlements. The defined settlement boundaries, including for Cromer and East Runton can be found on the Policies Map [Examination ref. A2]. In addition, settlement boundary reviews for the Small Growth Villages are evidenced in Background Paper 11 [Examination ref.C11]. Given the settlement boundaries for Cromer and East Runton, the proposed site allocation at Clifton Park, adjacent to the settlement boundary of Cromer, would be in accordance with Policy SS1 and would not conflict with the operation of the Small Growth Village approach set out in criterion 3 of the policy. Wyndham Holiday park is located on the north side of the A149.</p> <p>The site does not form part of any designated gap or buffer. Large parts of the land between Cromer and East Runton referred to is already developed and adjacent to the site lies the Seacroft Caravan and Motorhome camp site, various outbuildings. Other residential development lies adjacent to the site to the east and as noted there are various other large-scale caravans in the immediate vicinity that remain prominent in the wider Landscape. The wider and adjacent landscape also accommodates residential housing, most of which is appropriately screened.</p> <p>The site-specific Policy includes the requirement to retain and enhance existing footpath links, and includes requirements to mitigate impacts from the WRC. Details around the specific measures, the delivery and ongoing maintenance of footpaths and open space would be required as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer Contributions and Viability.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC85
Response Date	25/11/2024 16:12:26
Full Name	Mrs Margaret Bridgman
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Land at Runton Road/Clifton Park Cromer</p> <ol style="list-style-type: none"> 1 This piece of land has been wrongly described. It should read land at Runton Road, EAST RUNTON/Clifton Park CROMER 2 Yet again there is an attempt by this misnomer to pretend that this piece of land is in Cromer when it falls into the Parish of East Runton. There is even a large sign which says EAST RUNTON standing next to this field on the Runton Road. 3 This means that the land should be considered as part of the Strategy for Small Villages. Under the proposed growth changes in small growth villages 64 houses have been identified for both Runtons, this would exceed the entire allocation and would mean that no other houses could be built anywhere in the parishes. If this land was allocated it would change the status of East Runton as a small village and double the growth which has been allocated. 4 There has been no attempt to justify why the housing allocation for East and West Runton should be doubled by this development. 5 When the planning inspectorate considered an appeal by Barretts Homes it identified this piece of land as a significant gap between Cromer and East Runton, siting the

	<p>visibility of the houses at Wyndham Park. Allowing building here will erode the gap and blur the distinction between the two settlements.</p> <p>6 Part of the character of the North Norfolk coast lies in its range of small and distinct settlements. Allowing building here risks blurring the gap between Cromer and East Runton to the detriment of the holiday trade in the whole area. People come to East Runton because it's a small coastal village, they do not come to a suburb of Cromer. The whole character of the area will be changed.</p> <p>7 Regardless of the 'high quality' landscaping which would supposedly be required at the back of the site I would point out that the last time this site was suggested Anglia Water stated that they could not guarantee that there would not be odour problems on this area of the site. With this problem in mind I do not think the site is suitable for anything.</p> <p>8 I note the words 'in perpetuity' in relation to the landscaping. There is no indication of how this would be achieved or monitored. If this piece of land stays in its current ownership they will just keep coming back trying to circumvent the ruling. This land should be given to the local authority so that the Clifton's no longer control it.</p> <p>9 There is no indication of how the proposed landscaping would be maintained, who would be responsible for it, and would it be a burden on our taxes?.</p> <p>0 Norfolk County Council has recently taken on the responsibility for new footpaths across the site and it is not clear what will happen to these in the proposals.</p> <p>1 There is no mention of the Bridle Path which should be maintained.</p> <p>2 If the land in EAST RUNTON adjacent to Clifton Park is approved it will mean that if the council follows its own guidelines nothing else will be able to built. within either of the Runtons. There are better sites within the villages which would allow anyone who bought the houses to integrate within the community better than this site.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	<p>No</p>
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>Object: This piece of land has been wrongly described. It should read land at Runton Road, EAST RUNTON/Clifton Park CROMER. Misnomer to pretend that this piece of land is in Cromer when it falls into the Parish of East Runton. The land should be considered as part of the Strategy for Small Villages. Land should be considered as part of the Strategy for Small Villages. - Under the proposed growth changes in small growth villages 64 houses have been identified for both Runtons, this would exceed the entire allocation and would mean that no other houses could be built anywhere in the parishes. If this land was allocated it would change the status of East Runton as a small village and double the growth which has been allocated. Part of the character of the North Norfolk coast lies in its range of small and distinct settlements. Allowing building here risks blurring the gap between Cromer and East Runton to the detriment of the holiday trade in the whole area. This piece of land as a significant gap between Cromer and East Runton. concerns over siting the visibility of the houses at Wyndham Park. There would be odour problems on this area of the site.</p> <p>There is no indication of how the proposed landscaping would be maintained, who would be responsible for it, and would it be a burden on our taxes?.. note the words 'in perpetuity' in relation to the landscaping. There is no indication of how this would be achieved or monitored. There is no mention of the Bridle Path which should be maintained.</p> <p>If this piece of land stays in its current ownership they will just keep coming back trying to circumvent the ruling. This land should be given to the local authority so that the Clifton's no longer control it.</p>
<p>Officer Response</p>	<p>Comments noted. Whilst located within East Runton Parish, the site is immediately adjacent to Cromer's settlement boundary and therefore relates more to Cromer than to East Runton. The operation of Policy SS1 Spatial Strategy does not relate to parish boundaries but relies upon the defined settlement boundaries for the Selected Settlements. The defined settlement boundaries, including for Cromer and East Runton can be found on the Policies Map [Examination ref. A2]. In addition, settlement boundary reviews for the Small Growth Villages are evidenced in Background Paper 11 [Examination ref.C11]. Given the settlement boundaries for Cromer and East Runton, the proposed site allocation at Clifton Park, adjacent to the settlement boundary of Cromer, would be in accordance with Policy SS1 and would not conflict with the operation of the Small Growth Village approach set out in criterion 3 of the policy. Wyndham Holiday park is located on the north side of the A149.</p>

	<p>The site does not form part of any designated gap or buffer. Large parts of the land between Cromer and East Runton referred to is already developed and adjacent to the site lies the Seacroft Caravan and Motorhome camp site, various outbuildings. Other residential development lies adjacent to the site to the east and as noted there are various other large-scale caravans in the immediate vicinity that remain prominent in the wider Landscape. The wider and adjacent landscape also accommodates residential housing, most of which is appropriately screened.</p> <p>The site-specific Policy includes the requirement to retain and enhance existing footpath links, and includes requirements to mitigate impacts from the WRC. Details around the specific measures, the delivery and ongoing maintenance of footpaths and open space would be required as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer Contributions and Viability.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC92
Response Date	23/11/2024 14:13:00
Full Name	Mrs Kathryn Sault
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I have been a resident of Clifton Park for many years. As Clifton Park is built on a hill many of these properties incorporated large windows in the living rooms specifically to enjoy views looking across the meadow. If this development goes ahead I will be looking across the construction of a development for many years until it is completed. The disturbance and noise will have a detrimental impact on residents; many of whom are retired, leaving the end result looking across tiled roofs with lights on at night which will spoil the view for many people which was the reason I and the other residents purchased our homes.</p> <p>The main road is already extremely busy during holiday periods. If there are likely to be 70 dwellings, most families have two cars and if they are working there could be up to 140 cars leaving early in the morning thus disturbing residents and holiday makers who come to Cromer for a peaceful time. This could therefore impact tourism and putting regular visitors, such as to the caravans opposite the site, off which could in turn affect the local economy.</p> <p>As the road would be busier consideration needs to be given as to the impact on parents/carers walking with children and prams/buggies along a narrow pavement. The pavement is even narrower walking towards Morrisons and cutting through behind Clifton Park/Howards Way which many people do.</p> <p>As is well known, once a new road would be laid, planning permission will then be put in for the 'green space' area and then all the green space would be lost here. This land is the last green space in this area by the sea that is not occupied by events or a car park during the year (as opposite the site).</p> <p>The council are ploughing money into coastal improvement works for sea defences – do the council really want to flood the 'JEWEL' in Norfolk with buildings and lose a vital biodiverse and picturesque area to buildings?</p> <p>As is commonly known, many people walk their dogs here which of course is a necessity, and enjoy the flora and fauna in the meadow. This development will negatively change the landscape forever. We should be protecting it now and in years to come. I strongly also suspect that these houses are going to be out of reach for local people to purchase because of inflated prices.</p> <p>Please consider the hugely negative effect on people's wellbeing, health and happiness if the development proposal is accepted.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	

Officer Summary	<p>Object: As a resident of Clifton Park for many years. As Clifton Park is built on a hill many of these properties incorporated large windows in the living rooms specifically to enjoy views looking across the meadow. development will impact views and the disturbance and noise will have a detrimental impact on residents.</p> <p>The main road is already extremely busy during holiday periods. additional traffic will early in the morning thus disturbing residents and holiday makers who come to Cromer for a peaceful time. This could therefore impact tourism and putting regular visitors, such as to the caravans opposite the site, off which could in turn affect the local economy.</p> <p>Consideration needs to be given as to the impact on parents/carers walking with children and prams/buggies along a narrow pavement. The pavement is even narrower walking towards Morrisons and cutting through behind Clifton Park/Howards Way which many people do.</p> <p>once a new road would be laid, planning permission will then be put in for the 'green space' area and then all the green space would be lost here.</p> <p>many people walk their dogs here which of course is a necessity, and enjoy the flora and fauna in the meadow. This development will negatively change the landscape forever. he council are ploughing money into coastal improvement works for sea defences – do the council really want to flood the 'JEWEL' in Norfolk with buildings and lose a vital biodiverse and picturesque area to buildings?</p> <p>Please consider the hugely negative effect on people's wellbeing, health and happiness if the development proposal is accepted</p>
Officer Response	<p>Comments noted: English law has established that in most cases the potential impacts of a proposed development on private views is not a planning consideration. Private individuals do not have a right to a view and even if a new development significantly changes a view from a private property, this is not normally a legal ground on which planning approval can be refused.</p> <p>The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the Districts existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in Policy SS1 and as such is where a higher proportion of new housing will be located. Locations such as these have primary, secondary education, healthcare facilities and large town centres which coupled with the extensive choice of convenience and comparison good shopping, good public transport, higher order road networks and being the focus for commercial end employment investment perform a strong role as service centres and employment providers. As such the identified Large Growth Towns remain the most sustainable settlements and locations where growth should be directed. The assessment and proposed allocation policy has been informed in liaison with the Highways Authority.</p> <p>The site allocation includes the identification of a large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the existing biodiversity, ecology and open space as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC94
Response Date	28/11/2024 12:44:11
Full Name	Ms Tracy Bend
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>This is not the first planning request for this land. It is hard to understand what is different and changed from the previous (rejected) proposals. There are different numbers of houses proposed, 90, 55 and now 70. Again it needs to be clarified what the thinking is behind the changes in number of houses proposed for the size of this site.</p> <p>The draft policy requires that the development be to the North of the site and stepped back to retain the green approach to the Western side of Cromer. It doesn't take into consideration the only 'sea view' from the trainline approach to Cromer.</p> <p>The draft policy requires the provision of approx 5.3ha of open space. This same space has to be multi functional, maintained and includes the improvement of pathways. None of this</p>

	<p>works for 'nature'. Any improvement, multi functional open space or high-quality landscaping will be more sterile/ hostile to the bio-diversity of the area. We have seen the effect the flattening of the area has had on the flora and fauna over the last 18 months.</p> <p>The Council have to manage many differing and conflicting needs, but it seems that the focus is being lost about the biggest income stream for the County, tourism. Protecting tourism and the areas that make this section of coast a 'destination' is a valid goal.</p> <p>There is a housing need, but can you clarify that the types of houses proposed in this build will match the housing need you are dealing with? Estate housing is often for first-time buyers, young professional people, young families. Cromer is known for its older than average population and young professional people will need to be drawn in by more than just housing. Will this build match the people who need affordable homes? Will there be a substantial element of social housing?</p> <p>Another conflicting need this Council has to manage is the prevalence of second homes and homes for holiday lets. Is the Council able to bring more pressure to bear on this substantial part of the market before risking new builds in local nature areas?</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: This is not the first planning request for this land. It is hard to understand what is different and changed from the previous (rejected) proposals. There are different numbers of houses proposed, 90, 55 and now 70. Again it needs to be clarified what the thinking is behind the changes in number of houses proposed for the size of this site.</p> <p>Any improvement, multi functional open space or high-quality landscaping will be more sterile/ hostile to the bio-diversity of the area. We have seen the effect the flattening of the area has had on the flora and fauna over the last 18 months.</p> <p>The Council have to manage many differing and conflicting needs, but it seems that the focus is being lost about the biggest income stream for the County, tourism. Protecting tourism and the areas that make this section of coast a 'destination' is a valid goal.</p> <p>There is a housing need, but can you clarify that the types of houses proposed in this build will match the housing need you are dealing with? Estate housing is often for first-time buyers, young professional people, young families. Cromer is known for its older than average population and young professional people will need to be drawn in by more than just housing. Will this build match the people who need affordable homes? Will there be a substantial element of social housing?</p>
Officer Response	<p>Comments noted. The site was considered suitable for development as part of the regulation 18 Plan making stage but was not taken forward at the time as it was in part not needed to meet the then identified needs and there were more favoured sites. In developing the policy approach consideration has been given to the appropriate scale and layout. The scale is considered proportionate and reflective of the surroundings.</p> <p>The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the Districts existing and future identified needs, this includes residential and economic growth. Any development proposals will also have to accord with Policy HOU2 which sets out the required market and affordable housing mix and is aligned with the level of needs to ensure that the type, size and tenure of homes provided closely matches the existing and predicted future needs of the local population.</p> <p>The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. Any application would be subject to policy compliance around open space/green infrastructure, biodiversity net gain.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC116
Response Date	01/12/2024 09:43:00
Full Name	Ms Evie Anderson

Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I would like to raise my objection to the proposed housing development at Runton Rd/Clifton Park. This small piece of green space that creates a buffer between Cromer and East Runton is a place of natural delight. It's wonderful to see and despite the barbaric stripping of native bushes and shrubs a couple of years ago, the heathland has rewilded again. It is loved and appreciated by people like me who take walks there regularly.</p> <p>There are better locations for development in the area, specifically the Gurney fields between Crossdale street and cromer, which are currently agricultural land that isn't supporting bio-diversity like the runton gap location.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: This small piece of green space that creates a buffer between Cromer and East Runton is a place of natural delight. It's wonderful to see and despite the barbaric stripping of native bushes and shrubs a couple of years ago, the heathland has rewilded again. It is loved and appreciated by people like me who take walks there regularly</p> <p>There are better locations for development in the area</p>
Officer Response	<p>Comments noted: The site does not form part of any designated gap or buffer. The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The proposal is adjacent to the existing residential development of Cromer and would not extend the build area as described.</p> <p>The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC117
Response Date	01/12/2024 09:51:00
Full Name	Joan Nelson
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am writing to you to express my concern at the proposed housing development west of Clifton Park.</p> <p>There are very few areas in and around the area that are so abundant in wildlife, and is enjoyed by so many people all year round.</p> <p>I know there is a need for housing but I am sure that there are more suitable sites.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	

Officer Summary	Object: There are very few areas in and around the area that are so abundant in wildlife, and is enjoyed by so many people all year round. I know there is a need for housing but I am sure that there are more suitable sites.
Officer Response	<p>Comments noted. The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the Districts existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in Policy SS1 and as such is where a higher proportion of new housing will be located. Locations such as these have primary, secondary education, healthcare facilities and large town centres which coupled with the extensive choice of convenience and comparison good shopping, good public transport and being the focus for commercial end employment investment perform a strong role as service centres and employment providers. As such the identified Large Growth Towns remain the most sustainable settlements and locations where growth should be directed.</p> <p>The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation. The proposal also restricts development to the front section of the site and reduces the development impacts on the areas of existing Scrubland. Any application would be subject to policy compliance around open space/green infrastructure and biodiversity net gain.</p> <p>The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC118
Response Date	01/12/2024 10:02:00
Full Name	Lisa Shaw
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am writing to you in response to the concerns regarding the proposed housing development requested on the land West of Clifton Park.</p> <p>While I agree that North Norfolk could do with more affordable housing, I do not agree that the land West of Clifton Park is suitable for such development. Therefore, as a resident of Clifton Park, i would like to add my rejection of this proposal and here's why:</p> <ul style="list-style-type: none"> - First of all, destroying this land in order to build housing, I feel would be extremely detrimental to the wildlife that has established its home. This has already occurred once and it was extremely distressing, not only for the residents, but for the wildlife too. - Due to the sewage works on this land, I do not believe it would be suitable for residents. It can be bad enough living on Clifton Park, let alone closer to it. - Clifton Park is well known for its established quietness as well as the views overlooking the sea, as well as any wildlife that is present. Personally, having this destroyed by houses being built will be extremely upsetting for current residents. - this land is the only thing that separates Cromer from East Runton. Building on it will remove that boundary - An increase in traffic on an already chaotic Runton Road would be extremely detrimental to traffic flow, especially in times of increased population, such as summer. - this does not guarantee housing for those who need it. It only encourages people to buy 2nd homes as it already occurs. <p>This is not the first time this proposal has been rejected and rightfully so. I have spoken to multiple neighbours on Clifton Park who also agree this is not a suitable place for housing development. I believe there are plenty of other areas of open land that can be used for further housing. I implore that you consider my points into this situation that I feel strongly about. I really do not think developing this land will be beneficial in anyway. In particular unease, the coast road approaching Cromer would be further spoiled by yet more development. Once again, this land was withdrawn from the local plan previously submitted. That it should be re-submitted so rapidly is unreasonable. The wildlife offered by this area is irreplaceable</p>

	<p>and once they are gone the physical and emotional well-being of the residents and visitors who use this land for recreation is likely to be adversely impacted.</p> <p>I hope you will consider my thoughts and opinions in rejection to this proposal and take them into account,</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: While I agree that North Norfolk could do with more affordable housing, I do not agree that the land West of Clifton Park is suitable for such development. Therefore, as a resident of Clifton Park, i would like to add my rejection of this proposal and here's why:</p> <ul style="list-style-type: none"> • destroying this land in order to build housing, I feel would be extremely detrimental to the wildlife that has established its home. This has already occurred once and it was extremely distressing, not only for the residents, but for the wildlife too. • Due to the sewage works on this land, I do not believe it would be suitable for residents. • Clifton Park is well known for its established quietness as well as the views overlooking the sea, as well as any wildlife that is present. Personally, having this destroyed by houses being built will be extremely upsetting for current residents. • this land is the only thing that separates Cromer from East Runton. • An increase in traffic on an already chaotic Runton Road would be extremely detrimental to traffic flow • this does not guarantee housing for those who need it. It only encourages people to buy 2nd homes as it already occurs • This is not the first time this proposal has been rejected and rightfully so. I have spoken to multiple neighbours on Clifton Park who also agree this is not a suitable place for housing development. I believe there are plenty of other areas of open land that can be used for further housing
Officer Response	<p>Comments noted. Support for affordable housing is welcomed. The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the Districts existing and future identified needs for all types of development.</p> <p>The site allocation Policy includes requirements to mitigate impacts from the WRC which is located outside the site.</p> <p>In developing the policy approach consideration has been given to the appropriate scale and layout. The scale is considered proportionate and reflective of the surroundings.</p> <p>The site does not form part of any designated gap or buffer and is adjacent to the previous development at Clifton Park. Large parts of the land between Cromer and East Runton referred to is already developed and adjacent to the site lies the Seacroft Caravan and Motorhome camp site, various outbuildings. Other residential development lies adjacent to the site to the east and as noted there are various other large-scale caravans in the immediate vicinity that remain prominent in the wider Landscape. The wider and adjacent landscape also accommodates residential housing, most of which is appropriately screened.</p> <p>The assessment and proposed allocation policy has been informed in liaison with the Highways Authority.</p> <p>The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing - the site has not been subject to a previous planning application but was considered as part of the regulation 18 Plan making stage but was not taken forward at the time as it was in part not needed to meet the then identified needs at the time and there were more preferable sites at that time.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC121
Response Date	29/11/2024 09:05:00
Full Name	Claire Pennock
Organisation	

Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Please accept this email as my formal submission for the North Norfolk Local Plan: Further Consultation.</p> <p>My comments are regarding the proposed change 1: New Site Allocation: Land at Runton Road / Clifton Park, Cromer. I am against the proposal for building on this site for the following reasons:-</p> <ol style="list-style-type: none"> 1 To build approximately 70 dwellings on this land would have a negative impact on the local residents, due to the increase of traffic and local resources. 2 This land has been used for many years as a local walking area and a place to exercise dogs. Apart from walking down to the beach, if this land was used for housing, we have to get in a car and drive to somewhere else for a safe walk. I am also aware of an elderly lady who is able to take her daily exercise across this area but would not be able to make it as far as the beach. 3 To use this land for housing would decimate the biodiversity that is there. Nature needs our help and we need nature. I love walking along the paths, being in nature and listening to the birds as this has a positive effect on my mental wellbeing. 4 Surely by building on this land it would have a negative impact on the cliff erosion of the Cromer/East Runton coastline. The increase in hard standing ground does not help natural drainage and increases the risk of flooding. 5 If this proposal is granted, would it mean that Cromer and East Runton will combine into one? East Runton would lose its identity as a village and surely that's not right. 6 The houses built on this land wouldn't be affordable homes for local people. The amount of second homes and holiday homes in Cromer has increased dramatically over the past five to ten years and the potential for these homes to be used as a second home or holiday let, has a negative impact to the community. <p>Personally I think that this land should be compulsory purchased and utilised for the good of the community.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object:</p> <ul style="list-style-type: none"> • Impact on wider road network • Site has public benefit • Impact on biodiversity • Impact on coastal erosion • Site will cause coalescence • Concerns regarding provision of affordable housing and second homes
Officer Response	Comments noted. Concerns regarding coalescence are acknowledged and additional wording could be provided to mitigate its impacts.
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC123
Response Date	02/12/2024 09:26:00
Full Name	Sarah Monk
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>How can you ensure this will be affordable housing for local residents and not second homeowners.</p> <p>There is no infrastructure to support this alongside the west runton development .</p>

	<p>How will the space between, and separate identities of runton and cromer be managed?</p> <p>How will the nature and wildlife areas be managed? It's a rare landscape with significant biodiversity</p> <p>How will we manage increased vehicular access onto an already busy coast road where it's very difficult to pass cyclists</p> <p>- We don't want to see lots of odour complaints in future related to the Water works</p> <p>There must be alternative sites to consider</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: How can you ensure this will be affordable housing for local residents and not second homeowners. There is no infrastructure to support this. How will the space between, and separate identities of runton and cromer be managed? How will the nature and wildlife areas be managed? It's a rare landscape with significant biodiversity. How will we manage increased vehicular access onto an already busy coast road where it's very difficult to pass cyclists</p> <p>We don't want to see lots of odour complaints in future related to the Water works. There must be alternative sites to consider</p>
Officer Response	<p>Comments noted. The provision of affordable housing is required by policy and the site is expected to be in compliance with the policies set out in the Local Plan. The site allocation includes the identification of a large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the existing biodiversity, ecology and open space as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast.</p> <p>Cromer is identified as a Large Growth Town in Policy SS1 and as such is where a higher proportion of new housing will be located. Locations such as these have primary, secondary education, healthcare facilities and large town centres which coupled with the extensive choice of convenience and comparison good shopping, good public transport and being the focus for commercial end employment investment perform a strong role as service centres and employment providers. As such the identified Large Growth Towns remain the most sustainable settlements and locations where growth should be directed. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability</p> <p>The assessment and proposed allocation policy has been informed in liaison with the Highways Authority and appropriate access can be achieved.</p> <p>Site selection follows a set methodology based around suitability, deliverability and availability. A number of alternative options have been considered in identifying additional sites as detailed in Appendix 1 [examination document FC002]. Policy includes requirements to mitigate impacts from the WRC</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC126
Response Date	03/12/2024 11:45:00
Full Name	Wynne Ashlin
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	I have lived in East Runton for 17 years. I've used the plot of land to walk by myself for peace and quiet and watch the birds. I've walked dogs round their and I've picked blackberries with my grandson. To lose it would be criminal. The pressure from all the campsites around East

	Runton is considerable at the moment. Also who will be able to buy these houses? Not my daughter and son in law who wanted to move nearer to me for support with childminding. They will be for out of the area retirees or second home owners or airbnb.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: i've used the plot of land to walk by myself for peace and quiet and watch the birds. I've walked dogs round their and I've picked blackberries with my grandson. To lose it would be criminal. The pressure from all the campsites around East Runton is considerable at the moment. Also who will be able to buy these houses? Not my daughter and son in law who wanted to move nearer to me for support with childminding. They will be for out of the area retirees or second home owners or airbnb
Officer Response	<p>Comments noted. The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast.</p> <p>The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the Districts existing and future identified needs for all types of development.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC146
Response Date	06/12/2024 11:15:00
Full Name	Michael & Catherine Burke
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>We would like to add our voice to what must be many others to object about the above proposed development.</p> <p>The land has for many years been enjoyed by dog walkers and pedestrians, the entire community was horrified when a couple of years ago the land was barbarically destroyed by heavy plant and the locals made their feelings known in no uncertain terms. Since then the land has recovered somewhat and the wildlife has returned and the 'walkers' are back.</p> <p>It also provides a clear distinction between East Runton and Cromer, something that is necessary to show a boundary of sorts.</p> <p>It would surely prevent visitors to the 2 caravan sites, adjacent and opposite as the 'view' not to mention the additional traffic cannot be beneficial in any way.</p> <p>Cromer already doesn't have enough services for the current population, Doctor's, Dentist's, and Hospitals are constantly under pressure to deal with the demand and extra housing would put more pressure on them.</p> <p>Getting a Doctor's appointment presently can take a ridiculous amount of time and is not acceptable. More housing would just make things worse.</p> <p>The local residents are clearly in unity over this proposal and would be very unhappy were it to go ahead.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please	

outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: The land has for many years been enjoyed by dog walkers and pedestrians. The community was horrified when a couple of years ago the land was barbarically destroyed by heavy plant. Since then the land has recovered somewhat and the wildlife has returned and the 'walkers' are back.</p> <p>It provides a clear distinction between East Runton and Cromer, something that is necessary to show a boundary of sorts.</p> <p>Cromer already doesn't have enough services for the current population, Doctor's, Dentist's, and Hospitals are constantly under pressure to deal with the demand and extra housing would put more pressure on them.</p> <p>The local residents are clearly in unity over this proposal and would be very unhappy were it to go ahead</p>
Officer Response	<p>Comments noted: The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast. It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation.</p> <p>The site is adjacent to the existing settlement boundary and build form of Cromer and is not part of any designated gap or buffer</p> <p>The delivery of health infrastructure fall under the responsibilities of the relevant statutory bodies. The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning In Health Protocol which promotes a collaborative way of working between the ICB estates team and health partners, Public Health, Local Planning Authorities (LPAs), and helps ensure the impacts on health and care services from local plans and a growing population are measured, understood, mitigated, and managed appropriately by the delivery bodies which are informed through local Plans.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC147
Response Date	06/12/2024 11:24:00
Full Name	Mrs Janice Trimmer
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>This has already been turned down twice . It is a totally wrong site for housing development . The land has an abundance of wildlife and flora .It is in east runton and not Cromer. There is a caravan camp immediately opposite . Which at the moment has views of the open countryside and the train . This idyllic setting would be lost and have an impact on the holiday makers arriving as they would not want a view of houses . The impact it of cars on runton road is another consideration . This road is already very busy in the holiday season and as the carnival field is adjacent to the proposed development and carnival week already makes the road extremely congested.</p> <p>The sewerage works have a strong smell occasionally in the summer which can be smelt in Clifton park so be be stronger on the development.</p> <p>Clifton park is a quiet road and there would be an impact of potentially 200 people who probably use the shortcut to town which runs at the back of houses in Clifton park and onto fulcher avenue .</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please	

outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: This has already been turned down twice. It is a totally wrong site for housing development: wildlife and flora. It is in East Runton and not Cromer. There is a caravan camp immediately opposite which has views of the open countryside and the train, impact on the holiday makers arriving as they would not want a view of houses, impact of cars on Runton road, sewerage works have a strong smell occasionally in the summer, Clifton park is a quiet road and there would be an impact of potentially 200 people who probably use the shortcut to town which runs at the back of houses in Clifton park and onto Fulcher Avenue.
Officer Response	Comments noted :The site was considered suitable for development as part of the regulation 18 Plan making stage but was not taken forward at the time as it was in part not needed to meet the then identified needs and there were more favoured sites. The site is adjacent to the existing settlement boundary and build form of Cromer and is not part of any designated gap or buffer. The assessment and proposed allocation policy has been informed in liaison with the Highways Authority.
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC149
Response Date	06/12/2024 13:43:00
Full Name	Mr Howard & Katarzyna White & Trojan
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>We object to the proposals, which were once for 70 houses yet are now being reported as up to 90 houses, as follows:-</p> <ol style="list-style-type: none"> Light pollution - with up to 90 houses being proposed there will be street lighting, property outside lighting, etc. which will add to light pollution and affect wildlife and protective species such as bats Overdevelopment - a development of such numbers will create overdevelopment. Noise - additional and unacceptable noise will be created by the traffic flow from such a large development as well as the proposed play space Pressure on local services- we are very concerned about the pressure of such a large development will place on Cromer surgery. As an example, I, Howard White, requested a doctors appointment on 1st November and have been given an appointment for mid January '25.....a further 90 homes, possibly representing a further 270+ people, would put major pressure on this service which we fear could lead to unnecessary suffering or late diagnosis which may lead to worse scenarios Additional pressure on infrastructure - the roads in and out of Cromer often suffer from major congestion and a development of 90 houses could represent 180+ additional vehicles adding to the congestion. Parking is limited in Cromer with the main car park often at capacity along with the surrounding roads also being at maximum capacity most days. As the proposed development is a fair distance from central Cromer, at the very least the more elderly and physically restricted residents may well use their car to get in to Cromer rather than walk, adding to the road and parking congestion. Additional houses will lead to hundreds of vehicular movements per day and any road leading out from the site will be close to the existing bus stops and to local roads such as Clifton Park and Wyndham Park along with the entrance to Sea View Campsite and Wyndham Holiday Park - this may well create congestion/accidents along this stretch of road. Currently there are no parking restrictions in the vicinity of the proposed development site, along the Cromer Road. New developments allow for garaging, which is commonly used for storage rather than cars and limited parking per property which has proved to be insufficient on every development we have ever seen. Garages are often converted to additional habitable space to accommodate growing families or converted to home offices thus leading to even further restricted parking pushing the vehicles onto the public highways. Therefore, it is likely that insufficient parking will be provided on the proposed site encouraging residents to park on the new site roads as well as along the Cromer Road which will add to congestion and will create hazardous road conditions. Retention of established public footpaths - there are established public footpaths running across the proposed development land which have been well trodden over the years. These paths are signed 'public footpaths' and from my dealings with NNDC in the past, I am informed that NNDC litter pick these areas. The paths are enjoyed by

	<p>regular walkers and dog walkers and are also visited by bird and other wildlife watchers from near and far. The land is a well known place to view the outstanding and established wildlife that has existed here for centuries and does not deserve to be obliterated by the removal of the remaining established trees, shrubs, grassed areas, hedging, etc. and replacing all of this nature with new housing, underground drainage, lighting, hard surfaces such as roads and footpaths, etc.</p> <p>7 Wildlife - earlier in 2024 the owners of the site devastated the local wildlife by cutting down trees, bushes, ground covering foliage, etc. They showed no respect for the existing wildlife including nesting birds, foxes, mice, bats, etc. and NNDC seemed to have done nothing about their actions. The owners also erected a fence around the site shutting off the established public footpaths running across and around the site and creating a footpath directly behind our rear boundary. Again, we believe, NNDC did nothing until recently, where without notice from NNDC, some of the fencing was removed and some of the footpaths recut to be reestablished. We also note that a 5-bar gate was placed directly adjacent to the turning head sited by No. 20 Clifton Park, seemingly a further forward looking effort by the owners to access the land. Please note that the turning head is regularly used by the refuse lorry, delivery lorries and those wishing to turn back to Cromer and surely must not be used to access the land for any reason in the future</p> <p>8 Open space - to develop this land would result in a loss of a well used open space and would be detrimental to the environment. The space also represents the finish and start of Cromer and East Runton</p> <p>9 Linking of Cromer with East Runton - the proposed development would reduce the well established and important division between Cromer and East Runton</p> <p>To conclude, we are against any form of development on this land</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>Object: proposals, which were once for 70 houses yet are now being reported as up to 90 houses, as follows: Light pollution, noise due to traffic flow, pressure on local services (could lead to unnecessary suffering or late diagnosis which may lead to worse scenarios).additional pressure on infrastructure eg roads and parking - the proposed development is a fair distance from central Cromer - Elderly and physically restricted residents may well use their car to get in to Cromer rather than walk, adding to the road and parking congestion. Proximity to houses, bus stops and caravan parks will lead to congestion.</p> <p>New developments allow for garaging, which is commonly used for storage rather than cars and limited parking per property which has proved to be insufficient on every development we have ever seen - Therefore, it is likely that insufficient parking will be provided on the proposed site encouraging residents to park on the new site roads.</p> <p>There are established public footpaths running across the proposed development land enjoyed by regular walkers and dog walkers and are also visited by bird and other wildlife watchers - not deserve to be obliterated by the removal of the remaining established trees, shrubs, grassed areas, hedging, etc. Earlier in 2024 the owners of the site devastated the local wildlife by cutting down trees, bushes, ground covering foliage, etc. The owners also erected a fence around the site shutting off the established public footpaths running across and around the site and creating a footpath directly behind our rear boundary. We believe, NNDC did nothing until recently, where without notice from NNDC, some of the fencing was removed and some of the footpaths recut to be reestablished. A 5-bar gate was placed directly adjacent to the turning head sited by No. 20 Clifton Park, seemingly a further forward looking effort by the owners to access the land. Please note that the turning head is regularly used by the refuse lorry, delivery lorries and those wishing to turn back to Cromer and surely must not be used to access the land for any reason in the future.</p> <p>Development would result in loss of open space and reduce the well established and important division between Cromer and East Runton.Object: proposals, which were once for 70 houses yet are now being reported as up to 90 houses, as follows: Light pollution, noise due to traffic flow, pressure on local services (could lead to unnecessary suffering or late diagnosis which may lead to worse scenarios).additional pressure on infrastructure eg roads and parking - the proposed development is a fair distance from central Cromer - Elderly and physically restricted residents may well use their car to get in to Cromer</p>

	<p>rather than walk, adding to the road and parking congestion. Proximity to houses, bus stops and carvan parks will lead to congestion.</p> <p>New developments allow for garaging, which is commonly used for storage rather than cars and limited parking per property which has proved to be insufficient on every development we have ever seen - Therefore, it is likely that insufficient parking will be provided on the proposed site encouraging residents to park on the new site roads.</p> <p>There are established public footpaths running across the proposed development land enjoyed by regular walkers and dog walkers and are also visited by bird and other wildlife watchers - not deserve to be obliterated by the removal of the remaining established trees, shrubs, grassed areas, hedging, etc. Earlier in 2024 the owners of the site devastated the local wildlife by cutting down trees, bushes, ground covering foliage, etc. The owners also erected a fence around the site shutting off the established public footpaths running across and around the site and creating a footpath directly behind our rear boundary. We believe, NNDC did nothing until recently, where without notice from NNDC, some of the fencing was removed and some of the footpaths recut to be re-established. A 5-bar gate was placed directly adjacent to the turning head sited by No. 20 Clifton Park, seemingly a further forward looking effort by the owners to access the land. Please note that the turning head is regularly used by the refuse lorry, delivery lorries and those wishing to turn back to Cromer and surely must not be used to access the land for any reason in the future.</p> <p>Development would result in loss of open space and reduce the well established and important division between Cromer and East Runton.</p>
Officer Response	<p>Comments noted: The proposed allocation is restricted through policy to approximately 70 dwellings</p> <p>Cromer is identified as a Large Growth Town in Policy SS1 and as such is where a higher proportion of new housing will be located. Locations such as these have primary, secondary education, healthcare facilities and large town centres which coupled with the extensive choice of convenience and comparison good shopping, good public transport and being the focus for commercial end employment investment perform a strong role as service centres and employment providers. As such the identified Large Growth Towns remain the most sustainable settlements and locations where growth should be directed.</p> <p>The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast. It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation. Local Plan policy and national policy now require a net gain in biodiversity by at least 10%.</p> <p>The site is adjacent to the existing settlement boundary and build form of Cromer and is not part of any designated gap or buffer.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC150
Response Date	06/12/2024 14:59:00
Full Name	Sue & Derek Mildenhall & Ansell
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>We feel that this site is not suitable for house building.</p> <p>The site has well known biodiversity strengths.</p> <p>There are other more suitable sites for development, which wouldn't cause harm to the biodiversity and animal life</p> <p>We do not want The Gap between Cromer and East Runton closed.</p> <p>We are strongly opposed to this housing development.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	

If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: We feel that this site is not suitable for house building: - The site has well known biodiversity strengths.</p> <p>There are other more suitable sites for development, which wouldn't cause harm to the biodiversity and animal life</p> <p>We do not want The Gap between Cromer and East Runton closed.</p>
Officer Response	<p>Comments noted: The site is adjacent to the existing settlement boundary and build form of Cromer and is not part of any designated gap or buffer.</p> <p>The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast. It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation. Local Plan policy and national policy now require a net gain in biodiversity by at least 10%.</p> <p>The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the Districts existing and future identified needs for all types of development. The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC177
Response Date	07/12/2024 12:27:00
Full Name	David Groves
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: This land is well known for being rich in biodiversity. I understand there are other sites in Cromer which are suitable for development and this would not impact on the environment. The development of these sites should be prioritised before the land to the West of Clifton Park is even discussed.</p>
Officer Response	<p>The site is adjacent to the existing settlement boundary and build form of Cromer and is not part of any designated gap or buffer.</p> <p>The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast. It is considered that the site is typical of derelict</p>

	<p>and unmanaged land with scrub and other vegetation. Local Plan policy and national policy now require a net gain in biodiversity by at least 10%.</p> <p>The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the districts existing and future identified needs for all types of development. The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC178
Response Date	07/12/2024 16:57:00
Full Name	Ms Siri Taylor
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I strongly object to the proposed development of this site on the following grounds:</p> <p>1 This is beyond the existing built up area of the town and forms part of the important green buffer separating Cromer from East Runton. Loss of this open space will almost join the two settlements and will lead to overdevelopment and overcrowding which is out of character with the special qualities in this area of undeveloped coast.</p> <p>2 There is a considerable amount of noise and sometimes unhealthy odours which come from the sewage treatment works nearby. The residents in the proposed new development will certainly suffer and complain about this issue.</p> <p>3 The whole of site forms part of an important wildlife corridor of trees, heathland, undergrowth and overgrowth, totally unlike more cultivated areas of farmland and parkland. This allows movement of wild animals such as deer, foxes, hedgehogs and hares as well as offering feeding and habitat opportunities for an enormous variety of birds, insects and reptiles. Losing any part of this site will eliminate a valuable wildlife habitat which enhances our biodiversity and geodiversity, and it goes against any idea of nature conservation for long term benefit and carbon capture in our declared climate emergency.</p> <p>4 The site is adjacent to the designated Area of Outstanding Natural Beauty and contributes to its high landscape value. This development will have a material impact both visually and aurally, in the short term whilst building works are carried out, and in the long term as noise, light pollution and activity from residents increases.</p> <p>5 There will be a huge increase in traffic from the site, both during and after construction. How will Cromer's existing road system cope with this? Of all the proposed developments in the "Local Plan" Cromer is the only town without an adequate bypass. Problems with road safety, parking and traffic control will be inevitable and hugely costly to ameliorate.</p> <p>6 Surely this site beyond the Cromer Boundary and is part of East Runton so any development is under the Strategy for Small Villages - and would exceed the allocation.</p> <p>7 At present people approaching the town by road, rail, cycle or on foot can enjoy this untouched area of green space which greatly enhances the AONB. It gives the approach to Cromer a lovely rural area of open heathland landscape which enriches the character of the locality, and is a further draw for relaxed year-round tourists. Development of the site will lead to possible future encroachment over the open land and perhaps further up to Howards Hill, seriously reducing the rural character of the area. This will have a negative effect on the quality of the landscape and on the quality of life and wellbieng for local residents.</p> <p>8 This area is very much needed recreational space, for many decades it has been used and appreciated by walkers, horse riders and cyclists - both locals and holidaymakers, allowing safe access to East Runton and also to the sea avoiding the busy and polluted road route. It offers connectivity to the surrounding area, access to the rural landscape and coastal areas and makes a positive contribution to improving health and wellbieng. It also positively contributes towards North Norfolk's valuable tourism offer.</p> <p>In addition, I question the need for the amount of housing proposed for Cromer, based on central government insistence. Totally unsuitable and unsustainable at a local level. I feel sorry for the local councils who are forced into this situation "from the top" by central government people in power who have NO idea of our local needs or capacity.</p> <p>How will Cromer's infrastructure cope with this huge increase in traffic and population. The doctors surgery is already under pressure, other health and welfare services are stretched to breaking point, the roads cannot cope - especially during the summer. What jobs can we</p>

	<p>offer these new residents? will they be forced to journey costly carbon road miles to find work?</p> <p>There are not enough affordable low cost or rental homes in the area, and builders will insist on a majority of high value properties to justify their investment on a site like this, obviously this doesn't suit Cromer's needs. I wonder if the alternatives have been adequately investigated. Particularly the development of housing within existing structures eg: 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.</p> <p>Cromer relies heavily on tourism, based on our landscape and coastal aspect - as well as our traditional, unhurried and uncrowded atmosphere, the plans should seriously take this into account, this development should not be allowed and the land should be secured as open space in perpetuity. As NNDC 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".</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: This is beyond the existing built-up area of the town and forms part of the important green buffer separating Cromer from East Runton. loss of open space, unhealthy odours which come from the sewage treatment works nearby.</p> <p>The whole of site forms part of an important wildlife corridor of trees, heathland, undergrowth and overgrowth, totally unlike more cultivated areas of farmland and parkland. It gives the approach to Cromer a lovely rural area of open heathland landscape which enriches the character of the locality, and is a further draw for relaxed year-round tourists. Development of the site will lead to possible future encroachment over the open land and perhaps further up to Howards Hill, seriously reducing the rural character of the area. This area is very much needed recreational space.</p> <p>The site is adjacent to the designated Area of Outstanding Natural Beauty and contributes to its high landscape value.</p> <p>There will be a huge increase in traffic from the site, both during and after construction - Cromer is the only town without an adequate bypass. Problems with road safety, parking and traffic control will be inevitable and hugely costly to ameliorate.</p> <p>Surely this site beyond the Cromer Boundary and is part of East Runton so any development is under the Strategy for Small Villages - and would exceed the allocation.</p> <p>In addition, I question the need for the amount of housing proposed for Cromer, based on central government insistence. Totally unsuitable and unsustainable at a local level. I feel sorry for the local councils who are forced into this situation "from the top" by central government people in power who have NO idea of our local needs or capacity.</p>
Officer Response	<p>Comments noted: The site is adjacent to the existing settlement boundary and build form of Cromer and is not part of any designated gap or buffer. Policy includes requirements to mitigate impacts from the WRC</p> <p>The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast. It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation. Local Plan policy and national policy now require a net gain in biodiversity by at least 10%.</p> <p>Cromer is identified as a Large Growth Town in Policy SS1 and as such is where a high proportion of new housing will be located. Locations such as these have primary, secondary education, healthcare facilities and large town centres which coupled with the extensive choice of convenience and comparison good shopping, good public transport and being the focus for commercial end employment investment perform a strong role as service centres and employment providers. As such the identified Large Growth Towns remain the most sustainable settlements and locations where growth should be directed.</p>

	The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the districts existing and future identified needs for all types of development.
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC182
Response Date	08/12/2024 09:39:00
Full Name	Mrs Anna-lise Horsley
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am writing to oppose the plan to build 90 houses in the gap between Cromer and Runton. This is part of a larger plan to build over 500 new houses in Cromer.</p> <p>I should like to point out that this land is part of East Runton .</p> <p>Cromer does not have sufficient infrastructure OR EMPLOYMENT POSSIBILITIES to support a possible population rise of approximately 2000</p> <p>For example, the GPs practice is already under huge pressure.How can it possibly accommodate all these extra patients.?</p> <p>My objections to the 90 houses in the Runton gap are as follows.</p> <p>This vital piece of land is an important wildlife corridor . We have already lost so much biodiversity,and we need to be very careful to preserve what remains.</p> <p>This piece of land is part of our precious unspoilt landscape,one of the main tourist incentives to visit Cromer. Tourism is Cromer's main industry.</p> <p>The extra traffic would cause danger and more congestion through Cromer's already congested town centre since there is no bypass.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: to the plan to build 90 houses in the gap between Cromer and Runton. land is part of East Runton. Cromer does not have sufficient infrastructure OR EMPLOYMENT POSSIBILITIES to support a possible population rise of approximately 2000</p> <p>vital piece of land is an important wildlife corridor and is part of the main tourist attraction to the town</p> <p>The extra traffic would cause danger and more congestion.</p>
Officer Response	<p>Comments noted: The proposed allocation is restricted through policy to approximately 70 dwellings. The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the Districts existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in Policy SS1 and as such is where a higher proportion of new housing will be located. Locations such as these have primary, secondary education, healthcare facilities and large town centres which coupled with the extensive choice of convenience and comparison good shopping, good public transport and being the focus for commercial end employment investment perform a strong role as service centres and employment providers. As such the identified Large Growth Towns remain the most sustainable settlements and locations where growth should be directed.</p> <p>The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation. The proposal also restricts development to the front section of the site and reduces the development impacts on the areas of existing</p>

	<p>Scrubland. Any application would be subject to policy compliance around open space/green infrastructure and biodiversity net gain.</p> <p>The assessment and proposed allocation policy has been informed in liaison with the Highways Authority.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC186
Response Date	09/12/2024 11:43:00
Full Name	Joshua Dyball
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I'd like to register my opposition of the proposals to build on Clifton Park, Cromer.</p> <ul style="list-style-type: none"> - The land has significant biodiversity/wildlife value, and is capable of being a County Wildlife Site now. It is a rare landscape in this locality. - There will inevitably be odour complaints in future related to the Water Treatment Works, which the development will be closely located near. - This will impact on the settlement character, by closing the landscape gap between East Runton and Cromer.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: The land has significant biodiversity/wildlife value, and is capable of being a County Wildlife Site now. Impact on the settlement character, by closing the landscape gap between East Runton and Cromer. There will inevitably be odour complaints in future related to the Water Treatment Works.
Officer Response	<p>Comments noted. The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast. It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation.</p> <p>The site is adjacent to the existing settlement boundary and build form of Cromer and is not part of any designated gap or buffer. Policy includes requirements to mitigate impacts from the WRC.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC191
Response Date	09/12/2024 14:04:19
Full Name	Robert Harbord-Hamond
Organisation	
Agent Full Name	Marie Laidler
Agent Organisation	Swords
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILES</p> <p>This is a reasonable location for development and close to the town centre at less than 1 mile. It provides an extension to Cromer being alongside the current settlement limit. It is</p>

therefore a sustainable choice. This site was reviewed as a preferred site but not carried forward to the submission plan. The Inspector suggested that this site be reconsidered. Therefore, the new allocation is in accordance with these suggestions and can contribute to the overall soundness of the Plan.

The inspector notes in the published Examination Findings that *'whilst the proposed allocations (that include the Former Golf Practice Ground) are major developments in relation to Cromer the requirement for growth to meet local housing need and the town's position in the settlement hierarchy constitutes exceptional circumstances to justify the developments in the public interest'*

The Inspector also refers to the draft allocation for 'Land at Cromer High Station' that has been allocated since 2011 without development coming forward. He suggests that no development should be assumed in this plan period.

For this reason, another alternative site should be considered. Within the 'Regulation 18 First Draft Local Plan (Part 1) Alternatives Considered' document (Examination Library Document Reference B6) site reference C15/1 - Land At Harbord House, Overstrand Road with 1.6ha was assessed for housing. Whilst the site was not considered suitable for development at that time, the submission draft allocation at the Golf Practice Area (C16) lies to the south of this site on Overstrand Road. The reasons this was considered suitable was that the site is well positioned for access to the town centre, school and services, public transport options are available and that although within the AONB, it was not considered to result in being intrusive in the wider landscape.

The site at Harbord House was reviewed as not being suitable for development due to its prominent location on the approach into Cromer, containing a number of trees which provide a wooded character and that the development would threaten these existing trees. However, the character of the immediate area would change significantly with development of the allocated site to the south, the site abuts the existing settlement boundary, therefore it too is in a sustainable location as per the Former Golf Practice Area (C16). Trees of importance within the site are largely restricted to the perimeter which would be retained and thus provide screening of any development. The site lies adjacent to the Cromer Country Club which demonstrates that development north of Overstrand Road can assimilate into the landscape without significant detrimental impacts. The Links Hotel once accommodated space at the top of the sloped landscape which sat highly prominent within its setting, this was replaced by the Cromer Country Club that follows the topography of the site.

The proposal would be to provide residential care use for adults with Autism and Learning Difficulties as part of a previous planning implementation at Harbord House. Draft plans were drawn up for such a scheme but not pursued (attached to these comments). The development followed the topography of the site in a similar manner to the Country Club. Ensuring perimeter trees are protected would ensure wider views of the site would be limited and discrete to not impact upon the AONB.

It can be noted that the site is already serviced with sufficient Gas, Water, Electric and BT lines for up to 130 dwellings and a combined sewer. Allocation of Harbord House site should therefore be reconsidered as an additional allocation for Cromer.

Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	If the inspector is keen to look at further opportunities for Cromer then the alternatives in relation to our clients site can be explained in more detail.
File (where submitted)	Planning Appraisal DOC-20230823-WA0000_.pdf Feilden Mawson Plans 60 x 2 & 3 beds NK249130 (2).pdf Oxygen Pre-app response.pdf
Officer Summary	<p>Support: A reasonable location for development and close to the town centre at less than 1 mile. It provides an extension to Cromer being alongside the current settlement limit. It is therefore a sustainable choice.</p> <p>It is therefore a sustainable choice. This site was reviewed as a preferred site but not carried forward to the submission plan. The Inspector suggested that this site be reconsidered. Therefore, the new allocation is in accordance with these suggestions and can contribute to the overall soundness of the Plan.</p> <p>The inspector notes in the published examination findings: whilst the proposed allocations (that include the Former Golf Practice Ground) are major developments in relation to Cromer the requirement for growth to meet local housing need and the town's position in the settlement</p>

	<p>hierarchy constitutes exceptional circumstances to justify the developments in the public interest'</p> <p>Alternative site: The 'Regulation 18 First Draft Local Plan (Part 1) Alternatives Considered' document (Examination Library Document Reference B6) site reference C15/1 - Land At Harbord House, Overstrand Road with 1.6ha was assessed for housing. Whilst the site was not considered suitable for development at that time, the submission draft allocation at the Golf Practice Area (C16) lies to the south of this site on Overstrand Road. The character of the immediate area would change significantly with development of the allocated site to the south, the site abuts the existing settlement boundary, therefore it too is in a sustainable location. The proposal would be to provide residential care use for adults with Autism and Learning Difficulties as part of a previous planning implementation at Harbord House. Draft plans were drawn up for such a scheme but not pursued (attached to these comments).</p>
Officer Response	<p>Comments noted: Supported welcomed</p> <p>The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing.</p> <p>Site selection follows a set methodology based around suitability, deliverability and availability. A number of alternative options have been considered in identifying additional sites as detailed in Appendix 1 [examination document FC002]. Background paper 6, examination reference C6 sets out the approach to site assessment and selection.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC195
Response Date	09/12/2024 19:51:27
Full Name	Mr Jack Wones
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>To build on any part of this land would be an insult to many people both in Cromer and East Runton and even to some regular holiday makers that I have spoken to. A piece of land that separates the two communities that is so important to the visual effects of the area along with the wildlife of plants, animals, birds, insect that live in this location. Early this year the skylarks that have been nesting every year for many years have returned. where they nest is the area the proposed new houses are to be situated. Once one could see in one square meter a variety of plant life so great, it would be most difficult to find anywhere that match this unique sight. The whole area was decimated in less than a day which was an enormous task, purposely done before anyone could intervene.</p> <p>I have walked my dogs over these fields almost every day for the last 25 years and enjoyed every minute of it so much so, I have thought many times God Bless Mrs Clifton for this bit of paradise. This land should be left wild as it is at the moment.</p> <p>That's all I have to say about that.</p> <p>The company that owns this land is very big, so I have been informed and I would suspect that the building of this number of houses, just may allow them to break even from the purchase of the land. This however is far too high a price for the people of the area to pay and they should not have to pay by losing this so very important, and beautiful open area of wild land.</p> <p>There is no way that the building of anything on this land should be allowed either now or in the future. Please do not let this happen</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: A piece of land that separates the two communities that is so important to the visual effects of the area along with the wildlife of plants, animals, birds, insect that live in this

	<p>location. The whole area was decimated in less than a day which was an enormous task, purposely done before anyone could intervene.</p> <p>I have walked my dogs over these fields almost every day for the last 25 years and enjoyed every minute of it so much. This land should be left wild as it is at the moment.</p> <p>The company that owns this land is very big, so I have been informed and I would suspect that the building of this number of houses, just may allow them to break even from the purchase of the land. This however is far to higher price for the people of the area to pay and they should not have to pay by losing this so very important, and beautiful open area of wild land.</p>
Officer Response	<p>Comments noted: The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation. The proposal also restricts development to the front section of the site and reduces the development impacts on the areas of existing Scrubland. Any application would be subject to policy compliance around open space/green infrastructure and biodiversity net gain.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC196
Response Date	10/12/2024 00:42:00
Full Name	Mr Carl Chapman
Organisation	Liaison Committee Chairman Norfolk & Norwich Naturalists' Society
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Once again, I find myself having to defend the area at Runton Road from construction. Others have submitted supporting documents regarding the use of the wildlife that occupy this land all year I wish to bring to your attention the importance of Runton Road as a feeding area for migrating birds. In today's biodiversity freefall we have a moral and legislative duty to protect areas for our wildlife.</p> <p>The land is without question essential for migrating birds. Without it they will have nowhere to feed and replenish before setting off on their northward journey across the North Sea in Spring and nowhere to replenish their reserves on their return journey in Autumn when they require this area to rest and feed before moving on further south.</p> <p>As someone who has watched this area for many years I am dismayed we are even considering taking away such an important area from wildlife.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: I wish to bring to your attention the importance of Runton Road as a feeding area for migrating birds. In today's biodiversity freefall we have a moral and legislative duty to protect areas for our wildlife. The land is without question essential for migrating birds. Without it they will have nowhere to feed and replenish before setting off on their northward journey across the North Sea in Spring and nowhere to replenish their reserves on their return journey in Autumn when they require this area to rest and feed before moving on further south.</p>
Officer Response	<p>Comments noted: The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast.</p>

	It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation. North Norfolk wider landscape remains one of intrinsic rural character with a mosaic of habitats remains one of the most rural districts in the country.
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC197
Response Date	09/12/2024 21:06:00
Full Name	Mr & Mrs Linford
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am emailing to object to houses being built on the land behind Clifton Park.</p> <p>The area of land is inhabited by a wide variety of animals and birds, I walk my dogs along the few footpaths across this piece of land and have seen foxes, rabbits, deer, owls, kestrel, bats. It also has a wide variety of plants despite the cutting down of vegetation last year.</p> <p>While walking this area the smell from the sewage plant is on some days a little unbearable along the bottom end of the land, you would not want to buy a house there.</p> <p>Finally the increase in traffic off Clifton park onto the coast road would cause even more congestion than we already have, this piece of road is at times already overwhelmed with traffic. We have already had two accidents between the Clifton park junction and Wyndham park road in the last few years.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: The area of land is inhabited by a wide variety of animals and birds, I walk my dogs along the few footpaths across this piece of land and have seen foxes, rabbits, deer, owls, kestrel, bats. It also has a wide variety of plants despite the cutting down of vegetation last year.</p> <p>The smell from the sewage plant is on some days a little unbearable along the bottom end of the land,</p> <p>The increase in traffic off Clifton park onto the coast road would cause even more congestion than we already have, this piece of road is at times already overwhelmed with traffic.</p>
Officer Response	<p>Comments noted: The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast. It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation.</p> <p>The Policy includes requirements to mitigate impacts from the WRC.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC218
Response Date	10/12/2024 20:20:00
Full Name	Steven & Jill Salisbury
Organisation	
Agent Full Name	
Agent Organisation	

Does the Proposed Change contribute to the overall soundness of the Plan?	<p>We object to any plan to build homes on the land to the west of Clifton Park...</p> <ul style="list-style-type: none"> - The land has significant biodiversity/wildlife value, and is capable of being a County Wildlife Site. It is a rare landscape in this locality. - Already, at times, there are strong odours in the vicinity of the adjacent water treatment works. If more homes are built there will be an increase of odour complaints in future related to the water treatment works. - If built on, the settlement character will be severely impacted by closing the landscape gap between East Runton and Cromer.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: the land has significant biodiversity/wildlife value, and is capable of being a County Wildlife Site. At times, there are strong odours in the vicinity of the adjacent water treatment works. The settlement character will be severely impacted by closing the landscape gap between East Runton and Cromer.
Officer Response	<p>Comments noted: The site is adjacent to the existing settlement boundary and build form of Cromer and is not part of any designated gap or buffer. Large parts of the land between Cromer and East Runton referred to is already developed and adjacent to the site lies the Seacroft Caravan and Motorhome camp site, various outbuildings. Other residential development lies adjacent to the site to the east and as noted there are various other large-scale caravans in the immediate vicinity that remain prominent in the wider Landscape. The wider and adjacent landscape also accommodates residential housing, most of which is appropriately screened. The site is not designated as a CWS and further open land remains adjacent to the proposed site including wider local access to the coast.</p> <p>The Policy includes requirements to mitigate impacts from the WRC.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC220
Response Date	11/12/2024 15:01:00
Full Name	Mr John Daniels
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<ol style="list-style-type: none"> 1. The land separation between East Runton and Cromer will be eradicated which I believe along with many others, mainly local people do not want to see a housing development in place of the landscape that is already there. 2. There are, I am sure alternative better placed sites which are more suitable for approx. 90 dwellings. 3. The development will generate an accident black spot with the volume of traffic using Howards Hill (where traffic already travels to fast) or Runton Road itself. 4. What will happen to the wildlife that is already there (it will probably be eradicated as before when they had this bright idear to fence the land in). 5. Infrastructure is non existant as it stands with no dentists, doctors, schools etc etc (it can take local people 4-5 weeks to see a doctor). 6. Public right of ways on the existing land, what will happen to them if this development happens, how will they keep them open with complete safety for the public to use. 7. The local people of Cromer and East Runton will probably be priced out of buying, and once again a majority will be 2nd homes to the wealthy and left empty for months on end.
Do you consider it necessary to participate in a public hearing session, should these be required?	No

If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Separation between East Runton and Cromer will be eradicated which I believe along with many others, mainly local people do not want to see a housing development in place of the landscape that is already there.</p> <p>There are, I am sure alternative better placed sites which are more suitable for approx. 90 dwellings. The development will generate an accident black spot.</p> <p>What will happen to the wildlife that is already there (it will probably be eradicated as before when they had this bright idea to fence the land in. public right of ways on the existing land, what will happen to them if this development happens.</p> <p>Infrastructure is non-existent as it stands with no dentists, doctors, schools. Local people of Cromer and East Runton will probably be priced out of buying and once again a majority will be 2nd homes.</p>
Officer Response	<p>Comments noted: The site is adjacent to the existing settlement boundary and build form of Cromer and is not part of any designated gap or buffer. Large parts of the land between Cromer and East Runton referred to is already developed and adjacent to the site lies the Seacroft Caravan and Motorhome camp site, various outbuildings. Other residential development lies adjacent to the site to the east and as noted there are various other large-scale caravans in the immediate vicinity that remain prominent in the wider Landscape. The wider and adjacent landscape also accommodates residential housing, most of which is appropriately screened. Further open land remains adjacent to the proposed site including wider local access to the coast.</p> <p>The proposed allocation is restricted through policy to approximately 70 dwellings. The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the Districts existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in Policy SS1 and as such is where a higher proportion of new housing will be located. Locations such as these have primary, secondary education, healthcare facilities and large town centres which coupled with the extensive choice of convenience and comparison good shopping, good public transport and being the focus for commercial end employment investment perform a strong role as service centres and employment providers. As such the identified Large Growth Towns remain the most sustainable settlements and locations where growth should be directed. The delivery of health infrastructure falls under the responsibilities of the relevant statutory bodies. The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning In Health Protocol which promotes a collaborative way of working between the ICB estates team and health partners, Public Health, Local Planning Authorities (LPAs), and helps ensure the impacts on health and care services from local plans and a growing population are measured, understood, mitigated, and managed appropriately by the delivery bodies which are informed through local Plans.</p> <p>The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast.</p> <p>It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation. Local Plan policy and national policy now require a net gain in biodiversity by at least 10%.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC221
Response Date	11/12/2024 15:11:00
Full Name	Mrs Angeline Parsons
Organisation	
Agent Full Name	
Agent Organisation	

Does the Proposed Change contribute to the overall soundness of the Plan?	<p>The green space between Cromer & East Runton will be gone for good and it will become more of what both community's do not want and that is to see another large development rather than open space.</p> <p>The infrastructure to serve another large development is non existant with no service such as doctors, dentists, schools etc.</p> <p>The only thing this development is going to help is the 2nd home owners that will leave properties empty for long periods of time, it will not help the local community.</p> <p>There has got to be land better suited inland to build this amount of properties not right on the seafront which will become an eyesore.</p> <p>The wildlife is only just started to return to what it was prior to the obliteration some time ago. This not the place for this development.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>The green space between Cromer & East Runton will be gone for good and it will become more of what both community's do not want. The wildlife is only just started to return to what it was prior to the obliteration some time ago. This not the place for this development.</p> <p>No service such as doctors, dentists, schools etc. The only thing this development is going to help is the 2nd home owners. There has got to be land better suited inland to build this amount of properties.</p>
Officer Response	<p>Comments noted: The site does not form part of any designated gap or buffer. Large parts of the land between Cromer and East Runton. The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast.</p> <p>It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation. Local Plan policy and national policy now require a net gain in biodiversity by at least 10%.</p> <p>The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the Districts existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in Policy SS1 and as such is where a higher proportion of new housing will be located. Locations such as these have primary, secondary education, healthcare facilities and large town centres which coupled with the extensive choice of convenience and comparison good shopping, good public transport and being the focus for commercial end employment investment perform a strong role as service centres and employment providers. As such the identified Large Growth Towns remain the most sustainable settlements and locations where growth should be directed. The delivery of health infrastructure fall under the responsibilities of the relevant statutory bodies. The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning In Health Protocol which promotes a collaborative way of working between the ICB estates team and health partners, Public Health, Local Planning Authorities (LPAs), and helps ensure the impacts on health and care services from local plans and a growing population are measured, understood, mitigated, and managed appropriately by the delivery bodies which are informed through local Plans.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC222
Response Date	11/12/2024 18:01:10
Full Name	Mr Alan Sansom
Organisation	
Agent Full Name	
Agent Organisation	

Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILES</p> <p>I object to the proposed inclusion of this land for development.</p> <p>The land is currently undeveloped and is an open green space.</p> <p>It has several footpaths (Runton FP27, FP28 and FP29 and bridleway (Runton BR22) and a new restricted byway across it. It is accessed via Cromer FP16, Cromer BR2, Mill Lane in East Runton and Sandy Lane in Cromer as well as via Runton Road.</p> <p>It is easily accessible by a large number of residents from the densely-populated Western edge of Cromer, as the nearest piece of countryside.</p> <p>It serves as a natural area on the edge of Cromer as well as a separation between the town and neighbouring village. It has the benefits of green urban space, such as health and wellbeing, climate change, air quality and wildlife.</p> <p>LEAF benefits of urban green spaces, University of Leeds.</p> <p>Space to thrive, University of Sheffield.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	LEAF_benefits_of_urban_green_space_2015_upd.pdf space-to-thrive-2019-evidence-review.pdf
Officer Summary	<p>Object: The land is currently undeveloped and is an open green space. It has several footpaths, it is easily accessible by a large number of residents from the densely-populated Western edge of Cromer, as the nearest piece of countryside.</p> <p>It serves as a natural area on the edge of Cromer as well as a separation between the town and neighbouring village. It has the benefits of green urban space, such as health and wellbeing, climate change, air quality and wildlife.</p> <p>Attachments include LEAF benefits of urban green spaces, - University of Leeds. Space to thrive, - University of Sheffield.</p>
Officer Response	<p>Comments noted: The site is not identified as open land area or amenity green space. More information on this and the sites designated as such in Cromer / the Local Plan can be obtained for the Councils Amenity Green Space review [Examination library reference G3].</p> <p>The North Norfolk Open Space Assessment 2019 [Examination reference G11] identified that Cromer has a surplus of 3.10 ha amenity space when compared against the Local Plan standards as set out as part of policy HC2.</p> <p>The site does not form part of any designated gap or buffer. Large parts of the land between Cromer and East Runton referred to is already developed and adjacent to the site lies the Seacroft Caravan and Motorhome camp site, various outbuildings. Other residential development lies adjacent to the site to the east and as noted there are various other large-scale caravans in the immediate vicinity that remain prominent in the wider Landscape. The wider and adjacent landscape also accommodates residential housing, most of which is appropriately screened.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC227
Response Date	11/12/2024 19:50:00
Full Name	Steven & Jill Salsbury
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	
Do you consider it necessary to participate in a public hearing	

session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: The amount of houses that Labour are proposing on building is frankly frightening. We must ask ourselves the question 'Why'?</p> <p>Immigration into the country is unsustainable, and there are many properties, already built, that would be suitable for housing. What is happening to our 'green and pleasant land'?</p> <p>I am very much against more housing in and around Cromer, especially. The area near Clifton Park for 90+ houses is very unsuitable.</p> <p>It's a lovely green area, separating Cromer from East Runton. It would obviously add to traffic congestion in East Runton, be a further burden on our stretched resources, like doctors and dentists, and create problems for the nearby treatment works that do create a smell.</p> <p>Building houses in Cromer would also have a detrimental effect on our tourist industry. It is an attractive seaside resort drawing many visitors that appreciate the nice community feeling.</p>
Officer Response	<p>Comments noted: The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the Districts existing and future identified needs for all types of development. The Inspector's response to the Local Plan (July 2024 EH006(f)) states the submitted Plan has a shortfall of housing provision and the Council are seeking to provide additional allocations to help mitigate this shortfall and meet the revised objectively assessed needs.</p> <p>The proposed allocation is restricted through policy to approximately 70 dwellings in a defined area and the policy requires the delivery at least 5.3 ha of multi-functional open space to be managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology.</p> <p>The delivery of health and education infrastructure fall under the responsibilities of the relevant statutory bodies.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC229
Response Date	12/12/2024 14:20:00
Full Name	Steve & Debbie Banner
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: As locals living on Sandy Lane for over thirty years.</p> <p>We understand the need for more housing nationally. Especially for first time buyers in this area. However we feel that this particular area of land would be unsuitable, not just because we live nearby, but because we have seen housing built over the years that hasn't suited the needs of the local population. Property development companies just want to maximise profits, by normally cramming in as much on to the land as possible, without much thought for the needs of local communities.</p>

	<p>Concerns include: Loss of wildlife, impact on infrastructure, odour complaints, Joining up of Cromer and East Runton. Pathways, joining the Coastal Path used by walkers. Noise and light pollution. Impact on local holiday caravan and campsites in the very near vicinity. possibly drainage problems.</p> <p>The other possible proposed sites in the Cromer area don't currently get use by the public, as they are on the outskirts of town. This would then have less impact on locals well-being and local economy.</p>
Officer Response	<p>The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the Districts existing and future identified needs for all types of development. Any development proposals will also have to accord with Policy HOU2 which sets out the required market and affordable housing mix and is aligned with the level of needs to ensure that the type, size and tenure of homes provided closely matches the existing and predicted future needs of the local population.</p> <p>The proposed allocation is restricted through policy to approximately 70 dwellings in a defined area and the policy requires the delivery at least 5.3 ha of multi-functional open space to be managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology.</p> <p>Any proposal will need to accord with the proposed allocation policy requirements including the general requirements for the submission, approval and implementation of surface water management plan ensuring no adverse effects and increase in greenfield run off rates is required as part of the policy and application process Support for alternative site proposals noted.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC231
Response Date	12/12/2024 18:36:00
Full Name	Mrs Bernice Stowe
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am horrified to find out that there are plans to add the piece of land to the West of Clifton Park in Cromer to the local plan, I thought that it had been agreed that this important piece of land should not be built on.</p> <p>There are so many different types of plant & wildlife that would be wiped out if this land were to be developed, there are many other places available that wouldn't have such an impact on nature. Our British birds, bees, bats and bugs are on the decline, we need to keep our flora and fauna as breeding sites for so many species. If we do not the impact on our environment is going to be catastrophic as our planet is warming up at such a fast pace, so we need to help nature.</p> <p>I thought our government were serious about their concerns about the environment, why else would they have sent so many people to the recent COP29, committing an act of environmental vandalism like this would be a dreadful thing to do and they should be ashamed for even thinking about it.</p> <p>There are other concerns, adding to the already overloaded water supply, we barely get a trickle now, there would be extra water run off which would add to cliff erosion & the obvious breaching of the border between Cromer & East Runton.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	

Officer Summary	<p>Object: I thought that it had been agreed that this important piece of land should not be built on.</p> <p>There are so many different types of plant & wildlife that would be wiped out if this land were to be developed, there are many other places available that wouldn't have such an impact on nature. I thought our government were serious about their concerns about the environment, why else would they have sent so many people to the recent COP29, committing an act of environmental vandalism like this would be a dreadful thing to do and they should be ashamed for even thinking about it.</p>
Officer Response	<p>Comments noted: The site has not been subject to a previous planning application but was considered as part of the regulation 18 Plan making stage but was not taken forward at the time as it was in part not needed to meet the then identified needs at the time and there were more preferable sites at that time.</p> <p>The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC232
Response Date	12/12/2024 17:19:00
Full Name	Mr Paul Stowe
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am objecting to the land to the West of Clifton Park Cromer being added to the plan.</p> <p>This land has important use as a natural habitat for wildlife, there is a huge diversity of different species that inhabit this piece of land despite the efforts of the developers to try to wipe it all out. The land is used & enjoyed by lots of people for exercise and for getting in touch with nature, it is also a very important barrier to keep the developments of Cromer & East Runton separate.</p> <p>In my view it would be a catastrophe to build on this bio diverse environment when there are plenty of other suitable sites in the area.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: This land has important use as a natural habitat for wildlife, there is a huge diversity of different species that inhabit this piece of land despite the efforts of the developers to try to wipe it all out. The land is used & enjoyed by lots of people for exercise and for getting in touch with nature, it is also a very important barrier to keep the developments of Cromer & East Runton separate.</p> <p>There are plenty of other suitable sites in the area.</p>
Officer Response	<p>Comments noted: The site is adjacent to the existing settlement boundary and build form of Cromer and is not part of any designated gap or buffer.</p> <p>The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast. It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation. Local Plan policy and national policy now require a net gain in biodiversity by at least 10%.</p> <p>The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the Districts existing and future identified needs for all types of development. The</p>

	Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing. Support for alternative site proposals noted
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC233
Response Date	12/12/2024 17:23:00
Full Name	Mrs Adrienne Walsh
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am extremely concerned having I learnt that the Runton Gap Clifton Park site is once more being considered by North Norfolk District Council for housing development in it's Local Plan. It is proposed that 70 new houses should be built on the site. I am aware that central government are requiring local authorities to approve such schemes but I would question if development on this site is appropriate.</p> <p>Regardless of whether or not we do need large a scale of housing development in this region (where there has already been substantial development over the last decade) I would suggest that the Clifton Park site should not be considered for development for the following reasons:</p> <ul style="list-style-type: none"> • It has not been used for any agricultural or commercial use in many decades. • The site is an important asset to local people and visitors who regularly walk there and enjoy the open space it provides – there are limited alternatives in the Cromer area. • This site acts as an important green belt separating Cromer from East Runton. • The loss of this space would promote the coalescence of Cromer and East Runton and I fear it would only be a matter of time before the parcel of land adjacent and to the west would also become available for building. • Development of the site would further suburbanise our coastal environment and degrade it's seaside aspect which may deter summer visitors. • The site has become an important resource to resident and migratory birds many of which nest, shelter and feed there. Also a diverse array of wildlife depend on the site which includes lizards. Note also Britain is one of the most nature depleted countries in the world. • The site has developed a diverse plant community some of which are becoming rare in North Norfolk. • Building here will increase road traffic onto the already very busy A149 and into Cromer Town Centre which in turn will add to pollution. • There may also be an issue with the nearby Cromer sewage works regarding odour and whether it will be able to cope with the additional load from the proposed dwellings. I believe there has been multiple sewage spills into the sea in the past. <p>I would suspect the above objections are not exhaustive and others would add to it including professional bodies. This site has been under threat at least twice in the past and has been saved by local objection.</p> <p>Therefore I would ask NNDC to oppose development of the site and ask seek alternatives if indeed this level of building is to be imposed on our community.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: am aware that central government are requiring local authorities to approve such schemes. Regardless of whether or not we do need large a scale of housing development in this region (where there has already been substantial development over the last decade) I would suggest that the Clifton Park site should not be considered for development for the following reasons:</p> <ul style="list-style-type: none"> • It has not been used for any agricultural or commercial use in many decades.

	<ul style="list-style-type: none"> • The site is an important asset to local people and visitors who regularly walk there and enjoy the open space / important green belt separating Cromer from East Runton/coalescence of Cromer and East Runton /suburbanise our coastal environment. • The site has become an important resource to resident and migratory birds many of which nest, shelter and feed there/ he site has developed a diverse plant community • Building here will increase road traffic onto the already very busy A149 and into Cromer Town Centre • There may also be an issue with the nearby Cromer sewage works regarding odour and whether it will be able to cope with the additional load from the proposed dwellings seek alternatives if indeed this level of building is to be imposed on our community.
Officer Response	<p>Comments noted: The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the Districts existing and future identified needs for all types of development.</p> <p>The site allocation includes the identification of a large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the existing biodiversity, ecology and open space as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast.</p> <p>The North Norfolk Open Space Assessment 2019 [Examination reference G11] identified that Cromer has a surplus of 3.10 ha amenity space when compared against the Local Plan standards as set out as part of policy HC2. The site is not identified as open land area or amenity green space. It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation. Any application would be subject to policy compliance around open space/green infrastructure and biodiversity net gain.</p> <p>Support for alternative sites is noted: The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC235
Response Date	12/12/2024 21:37:00
Full Name	Fleur & Colin Stewart
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am writing to you to oppose your plans for 90 homes on the above site . It is beyond belief that this would even be considered as currently Cromer struggles with our current infrastructure , let alone you are prepared to destroy a green area of natural beauty to nature!</p> <p>Firstly infrastructure : just in case you are not aware, there are no dentists or doctors that can take on new patients and I'm assuming this new housing estate will not be providing any? Also schools, I imagine not!</p> <p>Also affordable housing for local people ? Perhaps you will offer 6 but then will retract?!</p> <p>I'm also not prepared to listen to Government demands, we do not need any more second homes or airb&b 's . You only need to drive On the coast road to Hunstanton to see how this has destroyed our coastline out of season.</p> <p>In short this planning application is complete greed and madness .</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	

Officer Summary	<p>Object: (90 homes) There are no dentists or doctors that can take on new patients and I'm assuming this new housing estate will not be providing any? Also schools, I imagine not! Also affordable housing for local people ? Perhaps you will offer 6 but then will retract?! I'm also not prepared to listen to Government demands, we do not need any more second homes or Airbnb 's . You only need to drive On the coast road to Hunstanton to see how this has destroyed our coastline out of season.</p> <p>In short this planning application is complete greed and madness.</p>
Officer Response	<p>Comments noted: The proposed allocation is restricted through policy to approximately 70 dwellings.</p> <p>The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the Districts existing and future identified needs for all types of development. Any development proposals will also have to accord with Policy HOU2 which sets out the required market and affordable housing mix and is aligned with the level of needs to ensure that the type, size and tenure of homes provided closely matches the existing and predicted future needs of the local population.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC250
Response Date	14/12/2024 10:51:02
Full Name	Mr Trevor Williams
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am the Chair of the local bird club which covers Cromer and Chair of a local wildlife conservation group.</p> <p>Development of this site (Runton Gap) would significantly impact on breeding birds but more importantly on migrating birds which use the area as a stop-over when moving between breeding and wintering grounds.</p> <p>There has been a dramatic decline in many passerine species, which breed in Scandinavia and winter in the Sahel, over the past twenty years. A significant factor has been the loss of suitable habitat for migrating birds to rest and recover.</p> <p>Areas of undisturbed rank grassland and scrub close to the coast are rare habitat and should be protected.</p> <p>Finding suitable sites to off-set (provide biodiversity plus) will be near impossible within the town.</p> <p>Developing this site will effectively join Cromer to East Runton which, together with the numerous caravan sites, will create one continuous ribbon development along the coast.</p> <p>If development is to go ahead on the current proposed scale the least disruptive site for biodiversity would be Pine Tree Farm.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: Development of this site (Runton Gap) would significantly impact on breeding birds but more importantly on migrating birds which use the area as a stop-over when moving between breeding and wintering grounds.</p> <p>Areas of undisturbed rank grassland and scrub close to the coast are rare habitat and should be protected.</p> <p>Developing this site will effectively join Cromer to East Runton which, together with the numerous caravan sites, will create one continuous ribbon development along the coast.</p> <p>If development is to go ahead on the current proposed scale the least disruptive site for biodiversity would be Pine Tree Farm.</p>

Officer Response	<p>Comments noted: The site does not form part of any designated gap or buffer. Large parts of the land between Cromer and East Runton referred to is already developed and adjacent to the site lies the Seacroft Caravan and Motorhome camp site, various outbuildings. Other residential development lies adjacent to the site to the east and as noted there are various other large-scale caravans in the immediate vicinity that remain prominent in the wider Landscape. The wider and adjacent landscape also accommodates residential housing, most of which is appropriately screened. The site is not designated as a CWS and further open land remains adjacent to the proposed site including wider local access to the coast. It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation. The proposed allocation policy also restricts development to the front section of the site and reduces the development impacts on the areas of existing Scrubland. Support for alternative site is noted: The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC251
Response Date	13/12/2024 16:26:59
Full Name	Julie Sansom
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I object to this site being used for housing for the following reasons.</p> <ol style="list-style-type: none"> 1. This is an area with numerous footpaths within it. It is a well used public amenity and the only piece of green space between Cromer and East Runton. 2. If used for housing it would be very interesting for second home owners or for those wanting to let out holiday homes due to it's position. Unless homes were reserved for permanent residents the homes would have no impact on the perceived need for more housing. 3. Apparently there's a need to ensure village growth and prosperity. This should not mean that villages become a suburb of the neighbouring town. This is what would happen to East Runton. 4. If housing is on this site it is on the wrong side of Cromer for schools. Children would not walk to school and the extra traffic would only add to the chaos already in Cromer's one way system. 5. There are more viable options for building land such as extending the site identified on Norwich Road. 6. Building on this land would lead to complaints about the smell from the water treatment plant and noise complaints about the funfair at carnival time. There would also be complaints about low flying helicopters landing in Jonas field. 7. Consider building on the land where Sal's car boot takes place. This would meet the need to reinvigorate villages and wouldn't mean that Cromer and East Runton merge.
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: It is a well used public amenity and the only piece of green space between Cromer and East Runton.</p> <p>If used for housing it would be very interesting for second homeowners.</p> <p>site it is on the wrong side of Cromer for schools.</p> <p>Development would lead to smell complaints and noise complaints about the funfair at carnival time and the low flying helicopter landing in Jonas field.</p> <p>There are more viable options for building land such as extending the site identified on Norwich Road. Consider (also) building on the land where Sal's car boot takes place.</p>

Officer Response	<p>Comments noted: The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the Districts existing and future identified needs for all types of development. Any development proposals will also have to accord with Policy HOU2 which sets out the required market and affordable housing mix and is aligned with the level of needs to ensure that the type, size and tenure of homes provided closely matches the existing and predicted future needs of the local population.</p> <p>Support for alternative site is noted: The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC252
Response Date	13/12/2024 16:55:38
Full Name	Mrs Brenda Stibbons
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILES</p> <p>I have walked in this area for many years observing the wildlife and flora. It is of significant value for wildlife and biodiversity which is rare in this area. Instead of using it for housing it could be developed as a Wildlife site.</p> <p>The area between Cromer and East Runton has gradually been taken up with permanent caravan parks. These used to be seasonal and the caravans removed during the winter but now they are permanent. The land adjacent to Clifton Park is important in providing a gap between the two settlements.</p> <p>To the south of the site is the Anglian Water sewage treatment works. Currently this is away from housing but if this land is developed the houses would be open to air pollution from this works.</p> <p>The land next to Pine Tree Farm on the Norwich Road at Northrepps would be a much better site to be developed for housing. There is room for more houses on that site, there are good transport links and pedestrian routes into Cromer</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	<p>Cromer to East Runton (2).jpg Cromer to East Runton (63).jpg</p>
Officer Summary	<p>Object: It is of significant value for wildlife and biodiversity which is rare in this area. Instead of using it for housing it could be developed as a Wildlife site.</p> <p>The area between Cromer and East Runton has gradually been taken up with permanent caravan parks. These used to be seasonal and the caravans removed during the winter but now they are permanent. The land adjacent to Clifton Park is important in providing a gap between the two settlements.</p> <p>Currently the WRC is away from housing but if this land is developed the houses would be open to air pollution from this works.</p> <p>The land next to Pine Tree Farm on the Norwich Road at Northrepps would be a much better site to be developed for housing. There is room for more houses on that site, there are good transport links and pedestrian routes into Cromer.</p>
Officer Response	<p>Comment noted: The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast. It is considered that the site is</p>

	<p>typical of derelict and unmanaged land with scrub and other vegetation. Local Plan policy and national policy now require a net gain in biodiversity by at least 10%. The site is adjacent to the existing settlement boundary and build form of Cromer and is not part of any designated gap or buffer.</p> <p>It should be noted that the policy already in clause 7 requires any application to have careful attention to form and site layout so as to mitigate the amenity impacts from the WRC. An odour assessment will be required as part of any application however the site policy already provides an indicative development area which approximately reflects the AW requirements. It should be noted that the adjacent Caravan site and a further two residential sites are already closer than the indicative residential area set out in the policy. The exacted amount of development and its location will be determined as part of any detailed planning application</p> <p>Support for alternative sites is noted: The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC258
Response Date	15/12/2024 06:37:10
Full Name	Mr Jeff Bowyer
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>This relates to Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)</p> <p>It is our submission that this proposal should not be allowed. This land development has been proposed before.</p> <p>Dealing with the draft policy points raised:</p> <p>The vehicular access from Clifton Park would enhance the risk to vehicle and pedestrian safety to what is already a dangerous corner with vehicles regularly approach that corner at speed from the south, cutting across the middle of the highway.</p> <p>The visual impact of the development (no matter the site layout/design and building heights) on the long ranging views from the west, would be adversely affected if any building of any type, were built on that site. The green space would be replaced by bricks and concrete, so it would be an obvious impact on current views.</p> <p>Reference the consideration of 5.3 ha for designated open space for retaining and enhancing ecology and wildlife habits. This space had a thriving ecological system prior to the current landowner having the landscape razed to the ground and killing off the habitat for wildlife and fauna. This impact will have a long term effect as the wildlife will not return whilst building is taking place and it is naive to think that will then be a natural place for wildlife to form and thrive.</p> <p>The impacts from the Wastewater Recycling Centre already effect households on Clifton Park with odours and any proposed buildings will be closer to the centre. This will generate complaints and would not make it an attractive proposition to purchase.</p> <p>Any development on that land would link Cromer to East Runton and both communities would lose their identities.</p> <p>To try and squeeze a development on the most northern point available would be nonsensical and destroy the green space that has served wildlife, fauna and the public for decades. There are already sufficient pedestrian/cycle links between the roads listed in the plan.</p> <p>The GIRAMS aims to reduce the negative effects on development sites. To allow this proposal will undoubtedly have a negative impact on the site, and no new cycle path or landscaping will counter any impact that any dwelling being built (let alone 70) would have.</p> <p>This area is not practical for development and because of the size and the finite expansion parameters, this site should not serve the purpose of trying to solve housing issues. There are other sites which offer more practical options with limiting impact on wildlife, fauna, traffic (one of the busiest roads in Cromer) and room for future expansion.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes

If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	To facilitate , if necessary, any potential new evidence/opinions
File (where submitted)	
Officer Summary	<p>Object: The vehicular access from Clifton Park would enhance the risk to vehicle and pedestrian safety to what is already a dangerous corner with vehicles regularly approach that corner at speed from the south, cutting across the middle of the highway.</p> <p>The visual impact of the development (no matter the site layout/design and building heights) on the long ranging views from the west, would be adversely affected if any building of any type, were built on that site. The green space would be replaced by bricks and concrete, so it would be an obvious impact on current views.</p> <p>Re 5.3 ha of open space for retaining and enhancing ecology and wildlife habits. This space had a thriving ecological system prior to the current landowner having the landscape razed to the ground and killing off the habitat for wildlife and fauna. This impact will have a long-term effect as the wildlife will not return whilst building is taking place and it is naïve to think that will then be a natural place for wildlife to form and thrive.</p> <p>The impacts from the Wastewater Recycling Centre already effect households on Clifton Park with odours and any proposed buildings will be closer to the centre. This will generate complaints and would not make it an attractive proposition to purchase.</p> <p>Any development on that land would link Cromer to East Runton and both communities would lose their identities.</p> <p>To try and squeeze a development on the most northern point available would be nonsensical and destroy the green space that has served wildlife, fauna and the public for decades. There are already sufficient pedestrian/cycle links between the roads listed in the plan.</p> <p>The GIRAMS aims to reduce the negative effects on development sites. To allow this proposal will undoubtedly have a negative impact on the site, and no new cycle path or landscaping will counter any impact that any dwelling being built (let alone 70) would have.</p> <p>This area is not practical for development and because of the size and the finite expansion parameters, this site should not serve the purpose of trying to solve housing issues. There are other sites which offer more practical options with limiting impact on wildlife, fauna, traffic (one of the busiest roads in Cromer) and room for future expansion.</p>
Officer Response	<p>Comments noted: The assessment and proposed allocation policy has been informed in liaison with the Highways Authority and appropriate and safe access can be achieved.</p> <p>It is considered that the development offers the opportunity to enhance the western edge of Cromer. The site is largely contained by existing development and permanent physical features, including the railway to the south and the current western edge of Cromer to the east.</p> <p>It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation. It's known that the site was cleared by the present owners in the recent past. The Council is keen to ensure enhancement, and the site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access.</p> <p>It should be noted that the policy already in clause 7 requires any application to have careful attention to form and site layout so as to mitigate the amenity impacts from the WRC. An odour assessment will be required as part of any application however the site policy already provides an indicative development area which approximately reflects Anglian Water requirements. It should be noted that the adjacent Caravan site and a further two residential sites are already closer than the indicative residential area set out in the policy. The exacted amount of development and its location will be determined as part of any detailed planning application.</p> <p>The site relates to the build form and settlement boundary of Cromer while the GIRAMS is a strategy to mitigate recreational impacts on designated European sites.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC264
Response Date	15/12/2024 19:58:12
Full Name	Mrs S Cameron
Organisation	

Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am adding my voice to the objections in relation to the proposed development of the land that we have always known as Muckle Hill. Having been a visitor to this land for many years I am dismayed that yet another attempt is being made to develop it into another faceless and poorly considered housing development.</p> <p>The land there has faced many threats and was recently recklessly desecrated by the scalping and installation of fenced off areas with barbed wire, posing risk to the wildlife and public that regularly used it. It is now against the odds starting to regain its footing and wildlife is again regularly seen including deers, rabbits, bats and many kinds of birds with the plant life gaining strength and diversity each day.</p> <p>Along the front at Cromer there is now no other open spaces since the crazy golf expansion was approved and in my opinion the local council is not capitalising on owning this land to develop into an area of environmental interest. There are already pedestrian right of ways and footpaths that go through the area which is used by many people including myself to walk my dog and to take my grandchildren on nature walks.</p> <p>This is the main route for many people using the nearby caravan sites to access the events in Cromer (like the carnival) and to access the beach at Cromer and East Runton. The natural state of the land is a factor that people coming to the area enjoy and like as a safe route through that part of the town.</p> <p>I am very concerned about the impact on the road into East Runton which is already a bottle neck where buses and lorries have extreme difficulty for most of the year, but especially in the summer. With additional building work and then the increased traffic from 70 dwellings (each of which are likely to have 2 cars like most households) this is going to be dangerous and will impact on tourism in Cromer which is its lifeblood currently.</p> <p>People who will be interested in buying these homes are unlikely to come from the local area, or indeed from Norfolk. It would therefore be more beneficial to approve the alternative expansion proposal for Cromer capitalising on the works that will already be taking place to minimise the impact on the town as a whole in terms of its individual nature and so that the homes are less desirable to holiday makers due to their non sea front location.</p> <p>I really hope that consideration is given to all the people that have fought for this land to remain a wildlife haven and a key part of Cromer identity over many years and many consultations - how many times do local residents have to say no, before a no actually counts for more than a couple of years? Local democracy is at risk of being shown to be a mockery. Once this asset is gone it is gone and with the lowering birth rates nationally, thinking in the real long term as government/councils should be, we are going to be left with more homes in Cromer than is actually needed.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: The land there has faced many threats and was recently recklessly desecrated by the scalping and installation of fenced off areas with barbed wire, posing risk to the wildlife and public that regularly used it. It is now against the odds starting to regain its footing and wildlife is again regularly seen.</p> <p>Along the front at Cromer there is now no other open spaces since the crazy golf expansion was approved and in my opinion the local council is not capitalising on owning this land to develop into an area of environmental interest. There are already pedestrian right of ways and footpaths that go through the area which is used by many people including myself to walk my dog and to take my grandchildren on nature walks.</p> <p>This is the main route for many people using the nearby caravan sites to access the events in Cromer (like the carnival) and to access the beach at Cromer and East Runton. The natural state of the land is a factor that people coming to the area enjoy and like as a safe route through that part of the town</p> <p>I am very concerned about the impact on the road into East Runton which is already a bottle neck where buses and lorries have extreme difficulty for most of the year, but especially in the summer. With additional building work and then the increased traffic from 70 dwellings</p>

	<p>(each of which are likely to have 2 cars like most households) this is going to be dangerous and will impact on tourism in Cromer which is its lifeblood currently.</p> <p>People who will be interested in buying these homes are unlikely to come from the local area, or indeed from Norfolk. It would therefore be more beneficial to approve the alternative expansion proposal for Cromer capitalising on the works that will already be taking place to minimize the impact on the town as a whole in terms of its individual nature and so that the homes are less desirable to holiday makers due to their non sea front location.</p>
Officer Response	<p>It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation. It's known that the site was cleared by the present owners in the recent past and the site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access.</p> <p>The Council do not own this land but are keen to ensure enhancement, and the site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access.</p> <p>The assessment and proposed allocation policy has been informed in liaison with the Highways Authority and appropriate and safe access can be achieved.</p> <p>The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the districts existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in Policy SS1 and as such is where a higher proportion of new housing will be located. Locations such as these have primary, secondary education, healthcare facilities and large town centres which coupled with the extensive choice of convenience and comparison good shopping, good public transport and being the focus for commercial end employment investment perform a strong role as service centres and employment providers. As such the identified Large Growth Towns remain the most sustainable settlements and locations where growth should be directed. Cromer is identified as a Large Growth Town in Policy SS1 and as such is where a high proportion of new housing will be located. Locations such as these have primary, secondary education, healthcare facilities and large town centres which coupled with the extensive choice of convenience and comparison good shopping, good public transport and being the focus for commercial end employment investment perform a strong role as service centres and employment providers. As such the identified Large Growth Towns remain the most sustainable settlements and locations where growth should be directed. The support for alternatives sites is noted.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC266
Response Date	12/12/2024 23:54:00
Full Name	Alice Digby
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am a resident of the beautiful village of East Runton. One of our village's many charms is that its a small village, separate from Cromer.</p> <p>I am very concerned that the proposed building of up to 90 houses will effectively close the gap between Cromer and my village.</p> <p>We don't have the infrastructure or amenities such as schools, doctors, suitable road networks, sewage systems, to accommodate potentially 200 or more people. It's already almost impossible to get a doctors appointment within a reasonable amount of time. The influx of more people will only exacerbate this already critically under resourced service.</p> <p>Such an increase in inhabitants could raise the population of our village by one third! This swift and huge rise is totally unacceptable.</p> <p>I am not opposed to a moderate and sustainable increase in sympathetically-styled housing in and around our village, of possibly up to 10 more houses. But the proposed up to 90 houses is not viable and we will not accept this.</p>

	<p>There is also the consideration of the green space that will be paved over in the building of the houses. This is a rare and important site for wildlife and enjoying nature, that we must not lose.</p> <p>Thank you for taking into consideration my views.</p> <p>I have read a lot of posts on social media, such as Facebook's 'East Runton Village' group and absolutely everyone is opposed to the proposed building plans. Therefore, I know that I speak for many in our village.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: (90 homes). Development will effectively close the gap between Cromer and my village.</p> <p>We don't have the infrastructure or amenities such as schools, doctors, suitable road networks, sewage systems, to accommodate potentially 200 or more people.</p> <p>I am not opposed to a moderate and sustainable increase in sympathetically-styled housing in and around our village, of possibly up to 10 more houses. But the proposed up to 90 houses is not viable and we will not accept this.</p> <p>I have read a lot of posts on social media, There is also the consideration of the green space that will be paved over in the building of the houses.</p>
Officer Response	<p>Comments noted: The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the Districts existing and future identified needs for all types of development. The proposed allocation is restricted through policy to approximately 70 dwellings in a defined area and the policy requires the delivery at least 5.3 ha of multi-functional open space to be managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology.</p> <p>The delivery of health / education infrastructure fall under the responsibilities of the relevant statutory bodies and starts with the proposals in a Local Plan.</p> <p>Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC267
Response Date	16/12/2024 09:41:03
Full Name	Mr Christopher Yardley
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	The site is not appropriate to include in the allocation. The site is in a key location separating the settlements of East Runton and Cromer. The site has a high ecological value to County Wildlife (C) site level. Visual impacts on the AONB and impacts on ecological value and connectivity will be severe and traffic impacts on the Town Centre and other minor roadways within the settlements to the east and west of the site will be significant and adverse. The site is not in a sustainable development location and its inappropriate to try to develop it
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please	

outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: The site is not appropriate to include in the allocation. The site is in a key location separating the settlements of East Runton and Cromer. The site has a high ecological value to County Wildlife (C) site level. Visual impacts on the AONB and impacts on ecological value and connectivity will be severe and traffic impacts on the Town Centre and other minor roadways within the settlements to the east and west of the site will be significant and adverse. The site is not in a sustainable development location and its inappropriate to try to develop it.
Officer Response	Comments noted. The site does not form part of any designated gap or buffer. The site is not designated as a CWS and further open land remains adjacent to the proposed site including wider local access to the coast. It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation.
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC269
Response Date	16/12/2024 09:43:00
Full Name	Mr & Mrs Darren & Lesley Osborne
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: firstly green space being built on which has biodiversity strengths and is deemed a County Wildlife Site, also the fact that it will join Cromer with East Runton. not enough infrastructure to support all these housing applications it's hard enough getting in to see Drs as it is without having another God knows how many houses built on this green space.
Officer Response	Comments noted: The site does not form part of any designated gap or buffer. Large parts of the land between Cromer and East Runton referred to is already developed and adjacent to the site lies the Seacroft Caravan and Motorhome camp site, various outbuildings. Other residential development lies adjacent to the site to the east and as noted there are various other large-scale caravans in the immediate vicinity that remain prominent in the wider Landscape. The wider and adjacent landscape also accommodates residential housing, most of which is appropriately screened. The site is not designated as a CWS and further open land remains adjacent to the proposed site including wider local access to the coast. The delivery of health / education infrastructure fall under the responsibilities of the relevant statutory bodies and starts with the proposals in a Local Plan. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC270
Response Date	13/12/2024 18:49:00

Full Name	Michael Horsley
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am writing to protest about the proposal to build houses on the Runton gap wild life area. This site is not suitable!</p> <p>I would like to propose that this piece of land should be a protected wildlife area since it forms a vital passage for wildlife which should not be destroyed.</p> <p>The additional disturbance which would be caused by building on this site is that the increase in traffic would cause danger and more pressure on residents since there is no road bypass and the town centre is often gridlocked as things stand.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: The additional disturbance which would be caused by building on this site is that the increase in traffic would cause danger and more pressure on residents since there is no road bypass. The land should be a protected wildlife area since it forms a vital passage for wildlife which should not be destroyed.
Officer Response	Comments noted: . The site is not protected, and further open land remains adjacent to the proposed site including wider local access to the coast. The proposal also restricts development to the front section of the site and reduces the development impacts on the areas of existing Scrubland. The proposed allocation is restricted through policy to approximately 70 dwellings in a defined area and the policy requires the delivery at least 5.3 ha of multi-functional open space to be managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology. The local plan requires on site biodiversity net gain of at least 10%.
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC271
Response Date	14/12/2024 21:33:00
Full Name	Andrew McCandlish
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p><u>Objection</u></p> <p>Having lived in Cromer for over 30 years I am well aware of the need to build housing. My children and most of their school contemporaries have all moved away, not simply because there were no employment opportunities, but there is a lack of suitable housing. This is partly caused by the excessive and uncontrolled number of second homes driving up prices.</p> <p>However, it is not acceptable to simply infill as seems to be the proposal between the north west of Cromer and East Runton.</p> <p>Reasons for this objection include:</p> <ol style="list-style-type: none"> 1 Sprawling development along the coast is going to create a detrimental feature. Tourists come for the unspoiled scenery of coastal North Norfolk and Cromer's attraction depends on retaining its share of such scenery. If the tourist economy is damaged there will be an impact on employment, so building houses will not benefit locals, but may simply fuel the second home issue. 2 There is pressure on Anglia Water's sewerage system already. We have Blue Flag status for our beaches, but with the present heavily loaded network along the coast

	<p>road sewage dumping through "emergency" only outfalls seems an immediate and convenient consequence.</p> <p>3 The existence of an existing sewage facility in the immediate area in question is problematic. Without its extensive redevelopment properties in the immediate area will suffer negatively if it is disturbed. Current key reservations that mortgage lenders have about negative factors affecting resale values are not to be ignored both for existing properties and any new-builds. Environmental considerations for residents and tourists should not be overlooked if a cheap, fly-by-night proposal leaves them facing significantly unpleasant smells, and potential pollution.</p> <p>4 There is an environmental need for breaks between settlements to sustain biodiversity and ecosystems. The green corridor between Holt Road and the sea is important. Further restricting that corridor may to the casual observer seem unimportant given the existence of corridors between the Runtons to the west and between Cromer and Overstrand to the east. However, the latter will be significantly diminished by the proposed development opposite the golf club house/RC church. For smaller creatures, including hedgehogs which are under threat, this will be problematic. So this local plan proposal is perverse.</p> <p>5 Serious questions arise as to why any developer would prefer to develop this location rather than in other areas to the south of Cromer. The obvious selling point would be sea views - that suggests a disingenuous market motive: second homes rather than homes for locals. The recent and ongoing developments towards and into Northrepps along the Norwich Road have used a brownfield site [ex Cromer High Station] and agricultural land. Land in Hall Lane near to the Zoo and towards the Council Offices on Holt Road would mirror the developments of Roughton Road. Is there good reason for not considering those locations instead? Given the location of my home I cannot be accused of NIMBYism.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>Object: Having lived in Cromer for over 30 years I am well aware of the need to build housing. My children and most of their school contemporaries have all moved away, not simply because there were no employment opportunities, but there is a lack of suitable housing. However reasons for objection include: sprawling development along the coast is going to create a detrimental feature. If the tourist economy is damaged there will be an impact on employment, so building houses will not benefit locals, but may simply fuel the second home issue.</p> <p>We have Blue Flag status for our beaches, but with the present heavily loaded network along the coast road sewage dumping through "emergency" only outfalls seems an immediate and convenient consequence.</p> <p>Current key reservations that mortgage lenders have about negative factors affecting resale values are not to be ignored both for existing properties and any new-builds. Environmental considerations (Anglian Water WRC) for residents and tourists should not be overlooked if a cheap, fly-by-night proposal leaves them facing significantly unpleasant smells, and potential pollution.</p> <p>The green corridor between Holt Road and the sea is important. Further restricting that corridor may to the casual observer seem unimportant given the existence of corridors between the Runtons to the west and between Cromer and Overstrand to the east. However, the latter will be significantly diminished by the proposed development opposite the golf club house/RC church.</p> <p>Serious questions arise as to why any developer would prefer to develop this location rather than in other areas to the south of Cromer. The obvious selling point would be sea views</p> <p>The recent and ongoing developments towards and into Northrepps along the Norwich Road have used a brownfield site [ex Cromer High Station] and agricultural land. Land in Hall Lane near to the Zoo and towards the Council Offices on Holt Road would mirror the developments of Roughton Road. Is there good reason for not considering those locations instead? Given the location of my home I cannot be accused of NIMBYism.</p>
<p>Officer Response</p>	<p>Support for additional housing noted: The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the districts existing and future identified needs</p>

for all types of development. The Inspector's response to the Local Plan (July 2024 EH006(f)) states the submitted Plan has a shortfall of housing provision and the Council are seeking to provide additional allocations to help mitigate this shortfall and meet the revised objectively assessed needs.

Any detailed planning proposals would be subject to compliance with all the policies including design as set out in the Local Plan

The site does not form part of any designated gap, or corridor. The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast. The proposal also restricts development to the front section of the site and reduces the development impacts on the areas of existing Scrubland. Any application would be subject to policy compliance around open space/green infrastructure, biodiversity net gain.

The comment re golf course seems unrelated to this proposed site allocation

Support for alternative sites is noted: The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing. More detail can be obtained through the site assessments booklets along with further information from the site selection methodology Background paper published in the examination library.

Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC272
Response Date	14/12/2024 11:50:00
Full Name	Chris Roach
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	I would like to object to the proposed land at Clifton park being put forward for housing it would impact on the natural beauty and the wild life also doctors and schools and road compacity.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: Development would impact on the natural beauty and the wild life also doctors and schools and road compacity.
Officer Response	Comments noted: Large parts of the land between Cromer and East Runton is already developed and adjacent to the site lies the Seacroft Caravan and Motorhome camp site, various outbuildings. Other residential development lies adjacent to the site to the east and as noted there are various other large-scale caravans in the immediate vicinity that remain prominent in the wider Landscape. The wider and adjacent landscape also accommodates residential housing. The delivery of health / education infrastructure fall under the responsibilities of the relevant statutory bodies and starts with the proposals in a Local Plan. Developer contributions, including those towards any required off site infrastructure, would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)

ID	FC273
Response Date	14/12/2024 12:59:00
Full Name	Denise Woodhouse
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	I have used this area for walks and other leisure activities for over 20 years. I find getting out of the house on Sandy Lane to a nearby natural area is calming for my mental health, as well as providing essential exercise. To have it developed for housing, when there are more suitable sites, would be tragic for me personally. It is an area of outstanding natural beauty as well as one of ecological diversity. It is situated between two blocks of built environment and forms a natural buffer zone. So, I hope that enough people will object for it to be abandoned for development, as it was once before in the recent past.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: I have used this area for walks and other leisure activities for over 20 years. I find getting out of the house on Sandy Lane to a nearby natural area is calming for my mental health, as well as providing essential exercise. To have it developed for housing, when there are more suitable sites, would be tragic for me personally. It is an area of outstanding natural beauty as well as one of ecological diversity. It is situated between two blocks of built environment and forms a natural buffer zone. So, I hope that enough people will object for it to be abandoned for development, as it was once before in the recent past.
Officer Response	Comments noted: The site allocation includes the identification of a large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the existing biodiversity, ecology and open space as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast.
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC274
Response Date	14/12/2024 09:49:00
Full Name	Marion & Chris Hewitt
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	I am writing to raise our concern and objections to the proposed building of houses on the land West of Clifton Park in Cromer. This is an area known for it's biodiversity and could become a county wildlife site. We have been visiting this North Norfolk region for over 40 years and have family who settled here. We have seen so many important green areas eroded and developed along this beautiful coastline in that time. Please don't allow this environmentally important green space to be lost too.
Do you consider it necessary to participate in a public hearing session, should these be required?	

If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: We have been visiting this North Norfolk region for over 40 years and have family who settled here. We have seen so many important green areas eroded and developed along this beautiful coastline in that time.
Officer Response	Comments noted: The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the districts existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in Policy SS1 and as such is where a higher proportion of new housing will be located.
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC285
Response Date	15/12/2024 11:17:00
Full Name	Val Stubbs
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I wish to object to the inclusion of the Land west of Clifton Park, Runton Road, Cromer, in the Local Plan for the construction of 90 houses.</p> <p>This piece of land has significant biodiversity and wildlife value, and is already capable of being a County Wildlife Site due to the existing flora and fauna. It is a rare landscape in the area.</p> <p>Constructing houses on this site would close the landscape gap between East Runton and Cromer, which would have a detrimental effect on the character of both settlements.</p> <p>Furthermore, this would have a negative impact on the availability of wild green spaces for the populations of both East Runton, and in particular, Cromer. It is widely recognised that access to nature has a positive effect on mental health. The inclusion of "green spaces" within a housing development would inevitably be of poorer quality as well as being smaller than the existing wild area.</p> <p>I recognise that there is both a need and government pressure for additional house building. However, there are alternative sites within which do not have the issues outlined above. Moreover, the government also has climate change and biodiversity commitments that it needs to meet, and the destruction of this piece of scarce and biodiverse habitat would be a move in the opposite direction.</p> <p>I am aware that Cromer Town Council is also opposed to this particular development. Please listen to local people and remove this piece of land from the Local Plan.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object (90 dwellings) this piece of land has significant biodiversity and wildlife value. This would have a negative impact on the availability of wild green spaces for the populations of both East Runton, and in particular, Cromer. It is widely recognised that access to nature has a positive effect on mental health. The inclusion of "green spaces" within a housing development would inevitably be of poorer quality as well as being smaller than the existing wild area.</p> <p>Houses on this site would close the landscape gap between East Runton and Cromer.</p> <p>I recognise that there is both a need and government pressure for additional house building. However, there are alternative sites within which do not have the issues outlined above.</p>

	Moreover, the government also has climate change and biodiversity commitments that it needs to meet.
Officer Response	<p>Comments noted: The proposed allocation is restricted through policy to approximately 70 dwellings in a defined area and the policy requires the delivery at least 5.3 ha of multi-functional open space to be managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology. The local plan requires on site biodiversity net gain of at least 10% .</p> <p>The site is not identified as open land area or amenity green space. More information on this and the sites designated as such in Cromer / the Local Plan can be obtained for the Councils Amenity Green Space review [Examination library reference G3].</p> <p>The North Norfolk Open Space Assessment 2019 [Examination reference G11] identified that Cromer has a surplus of 3.10 ha amenity space when compared against the Local Plan standards as set out as part of policy HC2.</p> <p>The site does not form part of any designated gap or buffer. Large parts of the land between Cromer and East Runton referred to is already developed.</p> <p>Support for alternative housing sites is welcomed. Site selection follows a set methodology based around suitability, deliverability and availability. A number of alternative options have been considered in identifying additional sites as detailed in Appendix 1 [examination document FC002]. Background paper 6, examination reference C6 sets out the approach to site assessment and selection.</p> <p>Development would be subject to other policies in the Local Plan including those around sustainable construction.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC286
Response Date	14/12/2024 12:16:00
Full Name	Mr Jonathan Anderson
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I received a flyer through my letterbox. Being a Cromer Resident, and also a local birdwatcher. I strongly oppose to the proposed housing development west of Clifton Park.</p> <p>Having a wildlife area like the land that has been mentioned above is essential (not just for the environment) but a lot of people like to watch the wildlife. And we are all being encouraged to enjoy nature healthily.</p> <p>Please keep the designated area as a wildlife area. (I am not a member of Greenpeace or a follower of Chris Packham and other environmentalists.</p> <p>Hope the campaign is successful.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: I received a flyer through my letterbox. Please keep the designated area as a wildlife area. Having a wildlife area like the land that has been mentioned above is essential (not just for the environment) but a lot of people like to watch the wildlife. And we are all being encouraged to enjoy nature healthily. (I am not a member of Greenpeace or a follower of Chris Packham and other environmentalists.
Officer Response	Comments noted: Full details of the proposed allocation and policy requirements are available in the consultation documents. The proposed allocation is restricted through policy to approximately 70 dwellings in a defined area and the policy requires the delivery at least 5.3 ha of multi-functional open space to be managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology.

Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC287
Response Date	16/12/2024 12:29:28
Full Name	Ms Anna Spall
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Primarily, the proposed site is NOT in Cromer but in E. Runton.</p> <p>This is one of the last natural unspoilt areas in our vicinity, where dogs can be walked and wildlife appreciated. It's a quiet area away from the busy town & beach during crowded summer months. It supports a plethora of wild flowers, including orchids, along with deer, monkjack and insect life including bees, butterflies and dragonflies. I've seen the rare swallowtail butterfly in the area.</p> <p>Furthermore, this development is unjustified and unsupportable given local facilities and demographic, ie. Where will these people work? How will they manage to negotiate already vastly overcrowded medical and dental services? How will our packed roads cope, especially in summer? Where are the school places? Where's the additional parking in town? Do we have adequate police to cover such a population increase? These questions are massively important.</p> <p>Lastly, I wonder who precisely will buy these homes? Will they in fact be 'affordable' by the time they're completed? We do NOT have a problem locally with homelessness. We're a rural holiday-based community: an historic town made up mainly of small businesses within an area of unspoilt countryside, woods and farmland that is of importance not only to the local populace, but to the larger ecology. This land is not expendable.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	Because these issues need debating locally. To 'steam roller' such issues, whether via councils or from 'above' via government, is completely undemocratic.
File (where submitted)	
Officer Summary	<p>Object: Primarily, the proposed site is NOT in Cromer but in E. Runton. This is one of the last natural unspoilt areas in our vicinity, where dogs can be walked and wildlife appreciated. It's a quiet area away from the busy town & beach during crowded summer. It supports a plethora of wild flowers, insect life including bees, butterflies and dragonflies.</p> <p>Furthermore, this development is unjustified and unsupportable given local facilities and demographic, i.e. Where will these people work? How will they manage to negotiate already vastly overcrowded medical and dental services? How will our packed roads cope, especially in summer? Where are the school places? Where's the additional parking in town? Do we have adequate police to cover such a population increase? These questions are massively important.</p> <p>Lastly, I wonder who precisely will buy these homes? Will they in fact be 'affordable' by the time they're completed? We do NOT have a problem locally with homelessness. We're a rural holiday-based community.</p>
Officer Response	<p>Comments noted: Whilst located within East Runton Parish, the site is immediately adjacent to Cromer's settlement boundary and therefore relates more to Cromer than to East Runton. The operation of Policy SS1 Spatial Strategy does not relate to parish boundaries but relies upon the defined settlement boundaries for the Selected Settlements.</p> <p>The proposed allocation is restricted through policy to approximately 70 dwellings in a defined area and the policy requires the delivery at least 5.3 ha of multi-functional open space to be managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology. The local plan requires on site biodiversity net gain of at least 10% . It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation and that other residential and commercial development lies adjacent to the site to the east.</p> <p>Its recognised that the demographic of North Norfolk is aging and as such it remains important to ensure that the Local Plan sets out an appropriate framework to deliver the growth that is</p>

	<p>necessary to meet the Districts existing and future identified needs for all types of development and supports the local economy. Cromer is identified as a Large Growth Town in Policy SS1 and as such is where a high proportion of new housing will be located. Locations such as these have primary, secondary education, healthcare facilities and large town centres which coupled with the extensive choice of convenience and comparison good shopping, good public transport and being the focus for commercial end employment investment perform a strong role as service centres and employment providers. As such the identified Large Growth Towns remain the most sustainable settlements and locations where growth should be directed. The site is one of the few that is in walking distance of the town centre</p> <p>The delivery of health / education infrastructure fall under the responsibilities of the relevant statutory bodies and starts with the proposals in a Local Plan.</p> <p>Developer contributions, including those towards any required off site infrastructure, would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability Police service is partly funded through the local precept included in council tax.</p> <p>The council's housing waiting list has at least 2,336 people registered on it requiring suitable housing and has a growing homeless "problem" and its key priorities for new housing include the delivery of new homes, that are the right size, type and tenure to meet the existing and future needs and also ensure the homes support the economic needs of the district. Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. The Inspector's response to the Local Plan (July 2024 EH006(f)) states the submitted Plan has a shortfall of housing provision and the Council are seeking to provide additional allocations to help mitigate this shortfall and meet the revised objectively assessed needs. The site will be expected to deliver affordable housing in line with the Policy HOU2.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC299
Response Date	16/12/2024 15:01:00
Full Name	Robert Lowe
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I would like you to take note of my email objecting to the proposed development on the land west of Clifton Park.</p> <p>This land should be kept as a walking and wildlife area.</p> <p>Other sites are available that will not cause harm to the local environment and wildlife.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: This land should be kept as a walking and wildlife area. Other sites are available that will not cause harm to the local environment and wildlife.
Officer Response	<p>Comments noted. The proposed allocation is restricted through policy to approximately 70 dwellings in a defined area and the policy requires the delivery at least 5.3 ha of multi-functional open space to be managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology. The local plan requires on site biodiversity net gain of at least 10%.</p> <p>The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing. Support is welcomed.</p>

Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC305
Response Date	16/12/2024 18:30:39
Full Name	Mrs Sarah King
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>The land at Runton Road / Clifton Park is a unique and special wildlife corridor and houses a great many species of flora and fauna, it would be a grave mistake to loose this vital area! It is also important to note that as a very nearby resident the smell from the sewage treatment plant would a huge issue for anyone who resided on this proposed site as it is an everpresent 'aroma' most days and would be unbearable to live with.</p> <p>Both of these reasons make this site unsuitable for the proposed development and should be given serious consideration with regard to not adding it to the plan.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	To underline the strength of feeling about why this proposal is wrong on many levels.
File (where submitted)	
Officer Summary	<p>Object: land at Runton Road / Clifton Park is a unique and special wildlife corridor and houses a great many species of flora and fauna, it would be a grave mistake to lose this vital area! It is also important to note that as a very nearby resident the smell from the sewage treatment plant would a huge issue for anyone who resided on this proposed site as it is an ever-present 'aroma' most days and would be unbearable to live with. Both of these reasons make this site unsuitable for the proposed development.</p>
Officer Response	<p>Comments noted: The policy includes requirements to mitigate impacts from the WRC and includes the requirement to provide details of any enhancements and set out how additional foul flows will be accommodated within the foul sewerage network.</p> <p>The site allocation includes the identification of a large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the existing biodiversity, ecology and open space as well as retaining public access. It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation. The local plan requires on site biodiversity net gain of at least 10% . The proposal also restricts development to the front section of the site and reduces the development impacts on the areas of existing Scrubland.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC306
Response Date	16/12/2024 21:01:27
Full Name	Mr John Symonds
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Have the following considerations been noted in the Plan.</p> <p>Our Tourism Industry relies on the peace and natural diversity of the area, the building of 70 dwellings will affect the area, there are several large caravan parks in the area which attracts visitors from around the UK.</p> <p>During the Holiday season there can be a strain on the present infastructure, by adding 70 more homes will not help.</p>

	<p>Removing effluent can be another serious issue if more houses are built. The present water companies are struggling now polluting the local beaches.</p> <p>The site is known locally for the diverse wildlife, birds, flowers and insects, it would be a shame to destroy this which will loose one of the main attraction for our local tourism in Cromer.</p> <p>One question which has not been mentioned in the plan...How many of the houses built will become Holiday Homes yet again not supporting our local community.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>General comments Our Tourism Industry relies on the peace and natural diversity of the area, the building of 70 dwellings will affect the area, there are several large caravan parks in the area which attracts visitors from around the UK.</p> <p>During the Holiday season there can be a strain on the present infrastructure, by adding 70 more homes will not help. Removing effluent can be another serious issue if more houses are built. The site is known locally for the diverse wildlife, birds, flowers and insects.</p> <p>One question which has not been mentioned in the plan. How many of the houses built will become Holiday Homes yet again not supporting our local community.</p>
Officer Response	<p>Comments noted. The Council's key priorities for new housing include the delivery of new homes that are the right size, type and tenure to meet the existing and future needs and also ensure the homes support the economic needs of the district. The policy includes requirements to mitigate impacts from the WRC including the submission, approval and implementation of a Foul Drainage Strategy providing details of any enhancements and set out how additional foul flows will be accommodated within the foul sewerage network.</p> <p>The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the districts existing and future identified needs for all types of development, including ensuring homes support the economic needs of the district, including that of tourism</p> <p>It is recognised that some residents may be concerned that provision of second homes and holiday homes that are potentially occupied only part of the week or part of the year, or let out seasonally, can be perceived as contributing to making housing unaffordable or less accessible for local people, due to a perceived adverse impact on the local housing market and the reduction in supply. It is often overlooked that such homes also contribute significantly to the available tourist accommodation and contribute to the local economy through tourist spend and employment opportunities and as such the issues are broader than just access to the housing market.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC312
Response Date	16/12/2024 22:51:59
Full Name	Mrs Sue Dyke
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am registering my opinion regarding this proposed development. This is an area of interest for nature, animals and plants, and is a natural break between Cromer and East Runton. Building on this land will merge the 2 in together, meaning the identity of East Runton will be lost. This is a village, and not part of Cromer. Any building on this plot will totally spoil the natural area, and create more strain on services. There are other places mentioned in the plan, that would be far more suitable if housing is to be built, but this area needs to be kept as a natural break.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	

If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>General comment: This is an area of interest for nature, animals and plants, and is a natural break between Cromer and East Runton. Building on this land will merge the 2 in together, meaning the identity of East Runton will be lost.</p> <p>Any building on this plot will totally spoil the natural area, and create more strain on services. There are other places mentioned in the plan, that would be far more suitable if housing is to be built, but this area needs to be kept as a natural break.</p>
Officer Response	<p>Comments noted: The site does not form part of any designated gap or buffer and is adjacent to the previous development at Clifton Park. The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the existing biodiversity, ecology and open space as well as retaining public access. The proposal also restricts development to the front section of the site and reduces the development impacts on the areas of existing Scrubland. Further open land remains adjacent to the proposed site including wider local access to the coast. Large parts of the land between Cromer and East Runton referred to is already developed and adjacent to the site lies the Seacroft Caravan and Motorhome camp site, various outbuildings. and as noted there are various other large-scale caravans in the immediate vicinity that remain prominent in the wider Landscape. The wider and adjacent landscape also accommodates residential housing, most of which is appropriately screened</p> <p>The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing. Support is welcomed.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC316
Response Date	15/12/2024 16:27:00
Full Name	Mrs L Harris
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>With reference to the planning application which has been lodged for proposed housing on land west of Clifton Park, Cromer. Being very local to the area I am writing to object to this development for the following reasons.</p> <ul style="list-style-type: none"> • Although I appreciate we need more housing, this site, over the years, has attracted an amazing amount of wildlife, both in animal, insect and plant form, and is well known for its biodiversity strengths. The damage this development would cause would, in my view, be permanent, in that this wildlife would all be lost. We should be protecting this area, and ideally enhancing the environment for all the wildlife. • I believe the local roads would struggle with the added traffic entering and exiting the site, especially during the summer season. • At present there is often a smell from the sewerage works. Any residents living closer to the sewerage works would find this unacceptable, and an issue I am sure Anglia Water could do without. <p>I am sure there are more local sites, which would be more suitable for housing, and would cause less damage to the wildlife.</p> <p>I would be grateful if these objections could be taken into consideration when considering this application.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please	

outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: Although I appreciate we need more housing, this site, over the years, has attracted an amazing amount of wildlife, both in animal, insect and plant form, and is well known for its biodiversity strengths. damage this development would cause would, in my view, be permanent, in that this wildlife would all be lost.</p> <p>I believe the local roads would struggle with the added traffic entering and exiting the site. I am sure there are more local sites, which would be more suitable for housing, and would cause less damage to the wildlife.</p>
Officer Response	<p>Comments noted: The site does not form part of any designated gap or buffer and is adjacent to the previous development at Clifton Park. The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the existing biodiversity, ecology and open space as well as retaining public access. The proposal also restricts development to the front section of the site and reduces the development impacts on the areas of existing Scrubland.</p> <p>The site is within walking distance of the town centre.</p> <p>The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing. Support is welcomed.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC328
Response Date	17/12/2024 13:56:00
Full Name	Mr Fergus Harold
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I object to the proposed change 1 (New site allocation: Land at Runton Road/Clifton Park, Cromer, C10/1), ie. The proposed application to build 70 houses at this location.</p> <p>My objection is that the site is unsuitable for redevelopment for house building and that other sites would be better suited. My objection is based on the following grounds:</p> <ol style="list-style-type: none"> 1 The environmental impact. This site is an area of outstanding natural beauty and is home to many species of wildlife including small deer, foxes and rabbits, and birdlife such as kestrels. Indeed, on a number of occasions it has attracted the attention of ornithologists because of sightings of particularly rare bird species. The area is well known for its biodiversity strengths and has been assessed as being capable of being a Country Wildlife site. Building houses on this site would cause irreparable damage to the local environment and wildlife. 2 Recreational impact. This area is well known and much utilised by local dog walkers who love this area and respect it's environment. The area contains registered Public Rights of Way (footpaths and bridleways). There are no other comparable areas for local dog walkers to use: Runton Road car park is much smaller in size and in the summer is unsuitable for dogs due to its utilisation as a car park. 3 Critical gap. This site marks the boundary between Cromer and the village of East Runton. There has always been a critical gap between Cromer and East Runton so that both can retain their distinctive identities. Should housing be built on that critical gap then effectively East Runton will be subsumed by Cromer and become a virtual suburb of Cromer thus losing its unique identity. 4 Health and safety. There are important health and safety issues to be considered under two headings, namely the adjacent sewage treatment works, and traffic issues. On the first issue, I would consider that building 70 houses in close proximity to a sewage treatment plant to be inadvisable on health grounds, especially for families with young children. Not infrequently there is a strong odour emanating from the sewage plant which is unpleasant to encounter even for occupants of Clifton Park which is some distance away. This odour would be almost unbearable for housing directly adjacent to the sewage plant, and could raise health concerns. On the second issue, namely traffic, there is a limited road infrastructure and so the inevitable increase in road usage (on the likely assumption that each house would have an average of two cars) would

	cause congestion and increased risk to road users and pedestrians alike. In the summer tourist season it would be even worse.
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: The site is unsuitable for redevelopment for house building and that other sites would be better suited.
Officer Response	Comment noted. The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing.
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC329
Response Date	17/12/2024 14:07:00
Full Name	Mrs Helen Mortimer
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	I wanted to voice my concern at the destruction of wildlife that is so important to our existence. How sad it would be to have a sprawl of bricks and concrete spreading Cromer into East Runton. Is a law was passed that people could only have one property, it would save this destruction of homes for wildlife, and the pleasure locals get from walking in it.
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	I just find it important to let ones voice be heard.
File (where submitted)	
Officer Summary	Object: This site is an area of outstanding natural beauty and is home to many species of wildlife. The area is well known for its biodiversity strengths and has been assessed as being capable of being a Country Wildlife site. Building houses on this site would cause irreparable damage to the local environment and wildlife. This area is well known and much utilised by local dog walkers who love this area and respect it's environment. The area contains registered Public Rights of Way (footpaths and bridleways). There are no other comparable areas for local dog walkers to use This site marks the boundary between Cromer and the village of East Runton. There has always been a critical gap between Cromer and East Runton so that both can retain their distinctive identities. here are important health and safety issues to be considered under two headings, namely the adjacent sewage treatment works, and traffic issues. I would consider that building 70 houses in close proximity to a sewage treatment plant to be inadvisable on health grounds. There is a limited road infrastructure and so the inevitable increase in road usage (on the likely assumption that each house would have an average of two cars) would cause congestion and increased risk to road users and pedestrians alike.
Officer Response	Comments noted. The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The

	<p>approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast.</p> <p>It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation.</p> <p>There is no policy context in relation to retention of gaps between settlements in the adopted or emerging Local Plan. Whilst located within East Runton Parish, the site is immediately adjacent to Cromer's settlement boundary and therefore relates more to Cromer than to East Runton and development would not close the "gap" between settlements. The site is largely contained by existing development and permanent physical features, including the railway to the south and the current western edge of Cromer to the east. It is considered that the development offers the opportunity to enhance the western edge of Cromer.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC330
Response Date	17/12/2024 14:12:00
Full Name	Mrs Pauline Moulton
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Whilst we are concentrating on building all these houses, lets not forget about peoples mental and physical health along with the wildlife which goes hand in hand.</p> <p>I have lived in this area for 25 years and this land has never been any different, I am 84 years of age, no longer drive a car and I like to walk and sit on this area and be at one with nature.</p> <p>I am able to walk to this site be it with my dog or alone and feel safe, don't take this pleasure away from me.</p> <p>There are many local residents like me that don't have a car, therefore if this land is taken away from us by the powers that be, I hope they can sleep at night.</p> <p>This site isn't suitable for housing it is adjacent to the sewerage treatment works and there are more suitable sites to build houses which would not cause harm to the local environment and wildlife.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	Every voice is important and these decisions affect our community.
File (where submitted)	
Officer Summary	<p>Object: Whilst we are concentrating on building all these houses, let's not forget about peoples mental and physical health along with the wildlife which goes hand in hand</p> <p>I am 84 years of age, no longer drive a car and I like to walk and sit on this area and be at one with nature.</p> <p>This site isn't suitable for housing it is adjacent to the sewerage treatment works and there are more suitable sites to build houses which would not cause harm to the local environment and wildlife.</p>
Officer Response	<p>Comments noted: The Council is a signatory of the Planning in Health Protocol and its use is required by policy HC1. As such major development should have regard to the healthy Planning checklist. The checklist is designed to highlight issues and facilitate discussion and can be used flexibly, reflecting the size and significance of the development. Used prospectively it can help assess plans and proposals and inform the design and layout of a development and influence those factors that can impact on the health and wellbeing of residents and the wider communities of Norfolk.</p> <p>The policy includes requirements to mitigate impacts from the WRC including the submission, approval and implementation of a Foul Drainage Strategy providing details of any</p>

	<p>enhancements and set out how additional foul flows will be accommodated within the foul sewerage network</p> <p>The site given its location also will allow residents the choice and convenience to access the town centre and nearer out of centre food stores on foot.</p> <p>The site is within walking distance of the town centre. The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing. Support is welcomed.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC331
Response Date	17/12/2024 14:19:00
Full Name	Mrs Julia Pennock
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am against the use of this land for housing and my reasons are:</p> <ul style="list-style-type: none"> • This land has been used for decades as a local area for wildlife to thrive and the amount of biodiversity is a credit to the area. • The community have walked the many pathways, enjoying the surroundings and serenity of the flora and fauna. • This land is the only green space within walking distance to the residents who live on the western fringe of Cromer. If this land is used for housing, residents who are elderly or have restricted mobility will have to drive to other green spaces and the extra use of cars is detrimental to the environment. • Nature is once again thriving here, even after the deliberate decimation of the land by the owners/developers. • Having more concrete laid will also have a negative impact on the coastline, which through erosion is extremely vulnerable to cliff slippage. • If house are built on this land, where is the buffer between Cromer and East Runton. • There are other more suitable sites, which are available to ensure the governments increased house building targets are met and these other sites wouldn't cause harm to the local environment and wildlife! Not to mention the community who live on the west side of Cromer.
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	It is essential that all voices of the local residents are heard and taken into consideration.
File (where submitted)	
Officer Summary	<p>Object: This land has been used for decades as a local area for wildlife to thrive and the amount of biodiversity is a credit to the area. This land is the only green space within walking distance to the residents who live on the western fringe of Cromer. The community have walked the many pathways, enjoying the surroundings and serenity of the flora and fauna. Nature is once again thriving here, even after the deliberate decimation of the land by the owners/developers</p> <p>If house are built on this land, where is the buffer between Cromer and East Runton. There are other more suitable sites, which are available to ensure the governments increased house building targets are met and these other sites wouldn't cause harm to the local environment and wildlife! Not to mention the community who live on the west side of Cromer.</p>
Officer Response	Comments noted. Disagree. It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation. The site does not form part of any designated gap or buffer and is adjacent to the previous development at Clifton Park. Further open land remains adjacent to the proposed site including wider local access to the coast. Large parts of the land between Cromer and East Runton referred to is already developed and adjacent to the site lies the Seacroft Caravan and Motorhome camp site, various outbuildings. and as noted there are various other large-scale caravans in the immediate vicinity that remain prominent

	<p>in the wider Landscape. The wider and adjacent landscape also accommodates residential housing, most of which is appropriately screened.</p> <p>The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing. Support is welcomed.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC333
Response Date	17/12/2024 14:25:00
Full Name	Mr & Mrs Mervyn & Rose Ely
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>This land is not suitable for the use of buildings due to the negative impact on the residents and area.</p> <p>To use this land for housing will have a detrimental effect on the environment and wildlife. It would be more useful to use a part of the area, to create a football pitch.</p> <p>It would also have an impact on the Cliff erosion due to the increase in paving/concrete. There would also be no buffer between Cromer and East Runton.</p> <p>This land should never even be considered for housing, as it's always been for wildlife. For many years it's been used as a walking area for locals, as apart from this area and the beach, there is no other places to walk on the West side of Cromer.</p> <p>More houses would require more services (Doctors, schools).</p> <p>There are more sites more suitable for housing which wouldn't harm the local environment and wildlife.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: not suitable for the use of buildings due to the negative impact on the residents and area. Housing will have a detrimental effect on the environment and wildlife. It would be more useful to use a part of the area, to create a football pitch.</p> <p>It would also have an impact on the Cliff erosion due to the increase in paving/concrete. There would also be no buffer between Cromer and East Runton.</p> <p>For many years it's been used as a walking area for locals, as apart from this area and the beach, there is no other places to walk on the West side of Cromer</p> <p>More houses would require more services (Doctors, schools).</p> <p>There are more sites more suitable for housing which wouldn't harm the local environment and wildlife.</p>
Officer Response	<p>Comments noted. Disagree. The policy requires the delivery at least 5.3 ha of open space to be managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the existing biodiversity, ecology and open space as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast. The local plan requires on site biodiversity net gain of at least 10%. A football pitch would potentially not enhance biodiversity.</p> <p>The site does not form part of any designated gap or buffer.</p> <p>The delivery of health infrastructure fall under the responsibilities of the relevant statutory bodies and starts with the proposals in a Local Plan. The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning In Health Protocol which promotes a collaborative way of working between the ICB estates team and health partners, Public Health, Local Planning Authorities (LPAs), and helps ensure the impacts on health and care services from local plans and a growing population are measured, understood,</p>

	<p>mitigated, and managed appropriately by the delivery bodies which are informed through local Plans.</p> <p>The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing. Support is welcomed.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC340
Response Date	17/12/2024 16:35:08
Full Name	Mr Paul Warner
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>My family and I have walked these paths and fields for over 5 decades enjoying the rich biodiversity of this site.</p> <p>I appreciate that there is a need for realistically priced affordable homes for our young people to be able to continue to live and work in the area but this is not the right site especially when there are other more suitable sites available.</p> <p>My concerns are as follows:</p> <ul style="list-style-type: none"> - Loss of the rich biodiversity of the land. - Impact of increased traffic on Clifton Park, Howard's Hill and Central Road. Central Road and Howard's Hill already suffer with parking issues all year round including people who park to go shopping in town or to catch the train. The additional houses would add to this pressure. - The foul odour from the sewage works which can be regularly smelt across the site. - Retreating cliffs. - Loss of the gap between Cromer and East Runton.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	I appreciate that there is a need for realistically priced affordable homes for our young people to be able to continue to live and work in the area but this is not the right site especially when there are other more suitable sites available. My family and I have walked these paths and fields for over 5 decades concerns are: loss of biodiversity, impacted of increased traffic, odour , retreating cliffs, and loss of gap.
Officer Response	Comments noted: The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing. The site does not form part of any designated gap or buffer and is adjacent to the previous development at Clifton Park. The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the existing biodiversity, ecology and open space as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast. The local plan requires on site biodiversity net gain of at least 10%.
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC343
Response Date	17/12/2024 19:10:11

Full Name	Miss Claire Pettit
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I most strongly object to the said proposal, and feel that due to the high concentration of biodiversity at this site, such a development would be extremely and irreversibly damaging to its species and habitats. Indeed, many of the species present at the site are Red Data Book cited and of conservation concern - both on a local, regional, and national scale. The site being important for breeding, migratory, and roosting species of birds throughout the year.</p> <p>As a birdwatcher, wildlife artist, and former officer with Natural England i cannot overstate the wildlife value of this site enough. I believe that this site should be permanently removed from the local plan, and, furthermore, be recommended and afforded the relevant legislative protection and status as either a Local Nature Reserve; County Wildlife Site; or potentially a SSSI designation.</p> <p>Such protection is long overdue i feel, especially as the current Landowners and their contractors pose a significant, and to a certain extent unchallenged threat to the sites habitats and wildlife as a result of their recent damaging activities, along with the enclosure of the land. Some of these activities breached sections of the Wildlife and Countryside Act, along with Right to Rome Act too. Surprisingly, to my knowledge, no enforcement action was taken against them !</p> <p>As well as its high biodiversity value, this site is also of great importance to the local community, both residents and visitors for the pursuit of quiet recreational activities such as walking; birdwatching; dog exercising, and socialising.</p> <p>Rights of way in the form of footpaths exist at the site, but, sadly due to recent erection of fencing, the former pathways are now somewhat limited.</p> <p>Whilst i recognise, up to a point, that housing (especially locally affordable) needs to be constructed, i do not feel that, in any way, this site lends itself to such a wholly inappropriate development. Not least, when you consider that more suitable land (brownfield) is available within the surrounding area. This would pose much less of a threat to local and valuable wildlife and habitats/species.</p> <p>I do so hope that considerations will be now be made to safeguard this important site. The removal of the site from the Local Plan and potential developmental threats, can i hope, provide the site, its valuable wildlife, and its use as a much loved community asset to be protected and enjoyed for now and future generations.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: such a development would be extremely and irreversibly damaging to its species and habitats. As a birdwatcher, wildlife artist, and former officer with Natural England i cannot overstate the wildlife value of this site enough. Site should be permanently removed from the local plan, and, furthermore, be recommended and afforded the relevant legislative protection and status as either a Local Nature Reserve; County Wildlife Site; or potentially a SSSI designation.</p> <p>i feel, especially as the current Landowners and their contractors pose a significant, and to a certain extent unchallenged threat to the sites habitats and wildlife as a result of their recent damaging activities, along with the enclosure of the land. Surprisingly, to my knowledge, no enforcement action was taken against them!</p> <p>The site is also of great importance to the local community, both residents and visitors for the pursuit of quiet recreational activities such as walking; birdwatching; dog exercising, and socialising. Rights of way in the form of footpaths exist at the site, but, sadly due to recent erection of fencing, the former pathways are now somewhat limited.</p> <p>Whilst i recognise, up to a point, that housing (especially locally affordable) needs to be constructed, I do not feel that, in any way, this site lends itself to such a wholly inappropriate development. Not least, when you consider that more suitable land (brownfield) is available</p>

	within the surrounding area. This would pose much less of a threat to local and valuable wildlife and habitats/species.
Officer Response	<p>Comments noted: The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation. The proposal also restricts development to the front section of the site and reduces the development impacts on the areas of existing Scrubland. Any application would be subject to policy compliance around open space/green infrastructure and biodiversity net gain. The site does not form part of any designated gap or buffer. The site is not designated as a CWS and further open land remains adjacent to the proposed site including wider local access to the coast.</p> <p>The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing. It should be noted that brownfield land often has its own environmental, wildlife and other considerations along with its own challenges and that the supply is limited in Cromer and North Norfolk.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC348
Response Date	17/12/2024 22:40:15
Full Name	Mr Mark Lyden
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	I wish to be present to offer my objections in person.
File (where submitted)	
Officer Summary	No comments left other than request to present objections in person at any future hearing.
Officer Response	No comments submitted.
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC363
Response Date	18/12/2024 12:34:19
Full Name	Mrs Victoria Hawkes
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	I do not agree that the proposed change contributes to the overall soundness of the Local Plan as providing houses should not be at the cost of spoiling natural wildlife habitats, a priority established by the Environment Act 2021 (which set legally binding targets to improve biodiversity in England and halt nature's decline) and which runs counter to aims of the Environment Improvement Plan 2023. See

<https://naturalengland.blog.gov.uk/2023/12/11/30-by-30-a-boost-for-nature-recovery/>.
<https://www.gov.uk/government/publications/environmental-improvement-plan>

Turning to the National Planning Policy Framework December 2024, the following points form the basis of my objections and explains where I consider that the proposed site does not fit with the aims of the framework.

Point 8(c) an environmental objective - – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Point 142 The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Point 147 makes as much use as possible of suitable brownfield sites and underutilised land;

Point 187 Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefit

Point 192 To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity⁶⁸; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation⁶⁹; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

My view is that it would be an irreversible tragedy to lose yet another piece of grass and scrubland which is enjoyed by the very many people who walk their dogs or use the footpaths – both locals and visitors. The topography of the parcel of the land is natural vegetation that flourishes unchecked providing a wonderful habitat for an abundant range of wildlife. The intrusion of houses would spoil the feeling of leaving the town behind and being in the countryside by effectively joining Cromer with East Runton. I believe that the creep of houses on this richly diverse piece of land would be totally detrimental to the amenities that this land provides and would blur the boundary between two separate communities, with residents neither belonging to Cromer or East Runton. If planning permission is granted on this piece of land, it would give encouragement and set a precedent for the adjoining piece of land to be included, thereby losing the whole of this green site to housing.

According to the Mental Health Foundation, The Wildlife Trusts, RSPB and Mind we critically need to preserve quality green belt land rich in biodiversity as never before. Importantly, research suggests that spending time in nature significantly boosts health and wellbeing. In times when mental health levels are declining, maintaining access to long-established sites that provide a nature boost is vitally important. (Barton J, Rogerson M. The importance of greenspace for mental health. *BJPsych Int.* 2017 Nov 1;14(4):79-81. doi: 10.1192/s2056474000002051. PMID: 29093955; PMCID: PMC5663018). This was well-evidenced during the Covid pandemic and is why I believe that areas of land such as this need to be preserved not only to enable communities to boost all chances of encouraging nature recovery but also to make a contribution towards mitigating the effects of climate change. A housing development would result in nature depletion.

Finally, any development on this site would encourage car dependency with residents using cars to access Cromer town amenities due to the distance of the site from the town centre, thereby increasing traffic on an already overburdened road.

Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: I do not agree that the proposed change contributes to the overall soundness of the Local Plan as providing houses should not be at the cost of spoiling natural wildlife habitats,

a priority established by the Environment Act 2021 which set legally binding targets to improve biodiversity.

Turning to the National Planning Policy Framework December 2024, Point 8(c) an environmental objective -- to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Point 142 The Government attaches great importance to Green Belts.

Point 147 makes as much use as possible of suitable brownfield sites and underutilised land;

Point 187 Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefit.

Point 192 To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity 68; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation 69; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

My view is that it would be an irreversible tragedy to lose yet another piece of grass and scrubland which is enjoyed by the very many people who walk their dogs or use the footpaths – both locals and visitors. The intrusion of houses would spoil the feeling of leaving the town behind and being in the countryside by effectively joining Cromer with East Runton.

According to the Mental Health Foundation, The Wildlife Trusts, RSPB and Mind we critically need to preserve quality green belt land rich in biodiversity as never before. Importantly, research suggests that spending time in nature significantly boosts health and wellbeing. Finally, any development on this site would encourage car dependency with residents using cars to access Cromer town amenities due to the distance of the site from the town centre, thereby increasing traffic on an already overburdened road.

Officer Response

Comments noted: The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the districts existing and future identified needs for all types of development. In line with legislative requirements Local Plan policy and national policy now require a net gain in biodiversity by at least 10% from all qualifying developments.

The local plan including the site allocations have been informed by a sustainability appraisal that considered many of the points raised. Each site assessment has also undergone a detailed review against the qualifying criteria as set out in the methodology background papers and assessment tables. When determining applications the development plan as a whole needs to be applied.

Mapping showing the range of sites that are identified as international, national and locally designated sites is available on the Council's web site as well of Natural England's and others.

The Council is keen to ensure enhancement and the site allocation The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast. It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation.

Cromer is identified as a Large Growth Town and remains one of the most sustainable settlements and locations where growth should be directed. The assessment and proposed allocation policy has been informed in liaison with the Highways Authority and appropriate access can be achieved. Nevertheless, the site is one of the few that is in walking distance of the town centre.

Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC365
Response Date	17/12/2024 18:06:00
Full Name	Siri Taylor
Organisation	Walk Cromer

Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>On behalf of "Walk Cromer" I should like to state our objections to this revised land allocation. For many decades walkers and families have used this area and delighted in its wonderful wild nature. Noting the many unusual wild flowers, collecting blackberries, admiring the views, watching the deer, rabbits, hares and spotting the many spectacular birds which hunt, nest and shelter in the undergrowth. It is a totally unique area to Cromer and offers a haven to visitors and residents who seek quiet contemplation away from the busy hustle of town and traffic, a fine place for restorative wellbieng. It also leads on to a wide range of interesting footpaths which create circular walks for visitors staying in the area, a great contrast to town and beach.</p> <p>The visual impact of building houses here should not be underestimated as the land borders an area of AONB and creates far-reaching views to the sea. We would hope someday it could be adopted as a wildlife conservation area, the rare grassland and scrub habitat creating a natural wildlife corridor between Cromer and Runton. Recognising the climate change emergency we also note that this is an important site for carbon capture, which could be improved by more tree planting.</p> <p>We know that thousands of people over the years have walked this land which offers a safe route between Cromer and Runton, avoiding the busy Runton Road pavements and polluting traffic, particularly in Summer. Traffic access to Runton Road will be difficult, it is already hazardous for the caravan sites, there will be a further influx of at least 200 cars from a new estate all battling their way through a town already gridlocked. Surely road safety must rule out this development.</p> <p>The land forms a natural "spacer" between Cromer and Runton, making a distinct division between the two settlements, surely this should be treasured and maintained. People visit this part of Norfolk to enjoy the peace and tranquility on offer, and this site creates a wonderful visual buffer for walkers and for those arriving by train, cycle, coach or car. A new housing estate here would totally ruin this visual and characterful approach and change the nature of both Cromer Town and Runton Village, the impact on tourism should not be underestimated.</p> <p>We also have concerns about local infrastructure being inadequate to service a housing estate here. In particular water supply, sewage smells from the water works, doctors, dentists, schools, jobs etc.</p> <p>We feel sure that more suitable sites could be found which can be less damaging to the area. Doubtless the builders will want to maximise their investment by producing mainly high cost homes for the wealthy, but we really need more low cost and social housing which aims to accommodate our local population and which will help to create a sustainable year-round economy for the area.</p> <p>We hope you may reconsider this land allocation and try to save this wild site for the long term future benefit of Cromer and Runton.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: For many decades walkers and families have used this area and delighted in its wonderful wild nature. Noting the many unusual wild flowers, collecting blackberries, admiring the views, watching the deer, rabbits, hares and spotting the many spectacular birds which hunt, nest and shelter in the undergrowth. It is a totally unique area to Cromer and offers a haven to visitors and residents who seek quiet contemplation away from the busy hustle of town and traffic, a fine place for restorative wellbeing. It also leads on to a wide range of interesting footpaths which create circular walks for visitors staying in the area, a great contrast to town and beach.</p> <p>The land forms a natural "spacer" between Cromer and Runton, making a distinct division between the two settlements.</p> <p>This site creates a wonderful visual buffer for walkers and for those arriving by train, cycle, coach or car. A new housing estate here would totally ruin this visual and characterful approach and change the nature of both Cromer Town and Runton Village, the impact on tourism should not be underestimated.</p> <p>The land borders an area of AONB and creates far-reaching views to the sea.</p>

	<p>Recognising the climate change emergency we also note that this is an important site for carbon capture, which could be improved by more tree planting.</p> <p>Land offers a safe route between Cromer and Runton, avoiding the busy Runton Road pavements and polluting traffic. It is already hazardous for the caravan sites, there will be a further influx of at least 200 cars from a new estate all battling their way through a town already gridlocked.</p> <p>Concerns about local infrastructure being inadequate to service a housing estate here. In particular water supply, sewage smells from the water works, doctors, dentists, schools, jobs etc.</p> <p>We feel sure that more suitable sites could be found which can be less damaging to the area. Doubtless the builders will want to maximise their investment by producing mainly high cost homes for the wealthy, but we really need more low cost and social housing which aims to accommodate our local population and which will help to create a sustainable year-round economy for the area.</p>
Officer Response	<p>Comments noted: The site does not form part of any designated gap or buffer and is adjacent to the previous development at Clifton Park. The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the existing biodiversity, ecology and open space as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast along with many other pathways and circular walks. The local plan requires on site biodiversity net gain of at least 10%.</p> <p>The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing. It should be noted that the site is one of the few that is outside the designated former AONB, now designated as National Landscape.</p> <p>The assessment and proposed allocation policy has been informed in liaison with the Highways Authority.</p> <p>Your concerns around infrastructure, investment in services and affordable housing deliver are noted. The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. The Inspector's response to the Local Plan (July 2024 EH006(f)) states the submitted Plan has a shortfall of housing provision and the Council are seeking to provide additional allocations to help mitigate this shortfall and meet the revised objectively assessed needs. The site will be expected to deliver affordable housing in line with the Policy HOU2. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability. Cromer as an identified Large Growth Town remains one of the most sustainable settlements in the district and where growth should be directed.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC371
Response Date	18/12/2024 12:00:45
Full Name	Mr & Mrs Malcolm and Anthoulla Menezes
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>We are writing to express our concerns and objections to the proposed building of houses on the land West of Clifton Park in Cromer.</p> <ul style="list-style-type: none"> The proposed plan will adversely impact the local wildlife habitat and biodiversity in this area. Moreover, it's a place local visitors and tourists cherish as it's an untouched and beautiful stretch of land. Local wildlife will disappear and this will no longer be an area where migratory birds and rare wildlife frequent. New housing means there will be an unmanageable strain on the infrastructure (roads, schools, sewers, water, drainage, electricity, gas and telephony (mobile signal, internet and phone lines). We also have limited doctor's surgeries in Cromer and this will increase the pressure on doctors, pharmacies and the emergency services.

	<ul style="list-style-type: none"> • The building of 70+ dwellings will impact the roads and will increase the danger to the public as the traffic will increase. The road between Cromer and East Runton is already busy during the holiday season and there are few or no crossings in this area. With the onset of new houses means more cars per property and this will impact local and nearby parking in areas like Clifton Park. • New housing means people will need employment and this will also put a strain on the local population as there will be more people for less jobs that are available. • Housing in this area will also put a strain on all the access roads and there will be more congestion in the town and a higher demand for parking. This will also impact tourism which is important for the town. • There will also be an increase in noise, pollution and potentially crime in the area as well. Building work will mean more heavy goods vehicles, potholes and congestion on the stretch between Cromer and East Runton. • Building here would also mean a loss of the gap between Cromer and East Runton. • We strongly object and suggest this plan is moved to alternative area which would be better in terms of aligning with infrastructure and services available and which doesn't impact biodiversity, wildlife and the wellbeing of the local population. • We also propose that this land is designated as a Local Nature Reserve as it is important for breeding, migratory, and roosting species of birds throughout the year. This will also add as a unique selling point for Cromer along with our 'Blue Flag' status of our beaches.
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: adversely impact the local wildlife habitat and biodiversity in this area. New housing means there will be an unmanageable strain on the infrastructure (roads, schools, sewers, water, drainage, electricity, gas and telephony (mobile signal, internet and phone lines). We also have limited doctor's surgeries in Cromer and this will increase the pressure on doctors, pharmacies and the emergency services.</p> <p>impact the roads and will increase the danger to the public as the traffic will increase, leading to more congestion and higher demand for parking. Increase in noise, pollution and potentially crime in the area as well.</p> <p>New Housing means people will need employment and this will also put a strain on the local population as there will be more people for less jobs that are available.</p> <p>Building here would also mean a loss of the gap between Cromer and East Runton.</p> <p>suggest this plan is moved to alternative area which would be better in terms of aligning with infrastructure and services available and which doesn't impact biodiversity, wildlife and the wellbeing of the local population. We also propose that this land is designated as a Local Nature Reserve.</p>
Officer Response	<p>Comments noted: The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast. Local Plan policy and national policy now require a net gain in biodiversity by at least 10% from all qualifying development and the Council are</p> <p>keen to ensure enhancement. The site is currently considered to be of derelict and unmanaged land with scrub and other vegetation, is of low grade grassland and is not designated.</p> <p>The delivery of health and wider infrastructure fall under the responsibilities of the relevant statutory bodies and starts with the proposals in a Local Plan. The Council is keen to see investment in and the delivery of increased services and the plan has been informed by continual engagement with the relevant statutory bodies. With regard Health the Council is a signatory of the Planning In Health Protocol which promotes a collaborative way of working between the ICB estates team and health partners, Public Health, Local Planning Authorities (LPAs), and helps ensure the impacts on health and care services from local plans and a growing population are measured, understood, mitigated, and managed appropriately by the delivery bodies which are informed through local Plans. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and</p>

	<p>compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p> <p>Cromer is identified as a Large Growth Town and remains one of the most sustainable settlements and locations where growth should be directed.</p> <p>There is no policy context in relation to retention of gaps between settlements in the adopted or emerging Local Plan. Whilst located within East Runton Parish, the site is immediately adjacent to Cromer's settlement boundary and therefore relates more to Cromer than to East Runton and development would not close the "gap" between settlements. The site is largely contained by existing development and permanent physical features, including the railway to the south and the current western edge of Cromer to the east. It is considered that the development offers the opportunity to enhance the western edge of Cromer.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC375
Response Date	18/12/2024 11:17:00
Full Name	Margaret & Iain Yockney
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am writing to object to the proposed housing development West of Clifton Park. This is a precious piece of land for Cromer and should be valued.</p> <p>Yes we do need housing and I am sure there are more suitable sites in and around Cromer. The land is not only a green breathing space between settlements, but is extremely important for its biodiversity which we are told is disappearing at an alarming rate.</p> <p>Please preserve this area for the many generations to come.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: Yes we do need housing and I am sure there are more suitable sites in and around Cromer. The land is not only a green breathing space between settlements but is extremely important for its biodiversity which we are told is disappearing at an alarming rate.
Officer Response	<p>Comments noted: support and recognition that housing sites are required is welcomed.</p> <p>The site does not form part of any designated gap or buffer and is adjacent to the previous development at Clifton Park. The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the existing biodiversity, ecology and open space as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast. The local plan requires on site biodiversity net gain of at least 10%.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC380
Response Date	18/12/2024 12:30:00
Full Name	Mr Dave King
Organisation	
Agent Full Name	
Agent Organisation	

Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I actually can't believe that we are being asked to comment on this proposed development yet again. It seems like only yesterday that we all had to make our position very clear in that this development in this particular location is not suitable. Whilst I am all in favour of the development of new (and especially affordable) housing, I am against it in this instance because:-</p> <p>This site is known for its diverse biodiversity, much of which had been terrorised in the last few years, but thankfully nature is a wonderful thing and things are finally taking shape again. Please leave this section of land to develop naturally and build upon the existing biodiversity to increase the wildlife, insects, pollinators etc.</p> <p>This site is also capable of being a County Wildlife site. There are many other more suitable pieces of land available that would be much more suitable for development and do not qualify for the County Wildlife status.</p> <p>As a resident that literally lives very close to the water treatment plant (adjacent to this proposed development), I can share first hand the very unpleasant smells that come from the treatment plant on a far too regular basis. What I can also say, as a frequent user of this site (dog walking; access to Cromer; access to East Runton etc) is that where this site is located, the smell is considerably worse. I for one, would not want to be domiciled in a location so readily prone to such unpleasant smells.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	Everyone taking the time to comment on this proposed development feels very passionately about the long term future of this land. If it requires participation in a hearing session, count me in.
File (where submitted)	
Officer Summary	<p>Object: Whilst I am all in favour of the development of new (and especially affordable) housing, I am against it in this instance because:-</p> <p>This site is known for its diverse biodiversity, much of which had been terrorised in the last few years.</p> <p>his site is also capable of being a County Wildlife site. There are many other more suitable pieces of land available that would be much more suitable for development and do not qualify for the County Wildlife status.</p> <p>As a resident that literally lives very close to the water treatment plant (adjacent to this proposed development), I can share first-hand the very unpleasant smells that come from the treatment plant on a far too regular basis.</p>
Officer Response	<p>Support for new housing noted. Any development proposals will also have to accord with Policy HOU2 which sets out the required market and affordable housing mix and is aligned with the level of needs to ensure that the type, size and tenure of homes provided closely matches the existing and predicted future needs of the local population.</p> <p>The approach also requires a focus on retaining and enhancing much of the existing biodiversity, ecology and open space as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast. The local plan requires on site biodiversity net gain of at least 10%. The Policy includes requirements to mitigate impacts from the WRC.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC397
Response Date	18/12/2024 15:34:48
Full Name	Mrs Jill Boyle
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	I am responding to the proposal for 60 houses on the land west of Clifton Park. I object to this land being used for building. The properties would be subject to odours emitting from the Anglian Water sewage treatment works in front of the site. This can be extremely unpleasant at times when just walking past, let alone living right by it.

	<p>This land has a great deal of biodiversity and is quite unique in this area. It is well established and would be really difficult to replicate. There is extensive wildlife, birds and some interesting vegetation. Studies have been carried out on this rich area over many years.</p> <p>The other main reason for our objection is that it would close the settlement gap between Cromer and East Runton. With no distinct gap there becomes an undefined urban sprawl which means towns and villages lose their identity.</p> <p>There must be other land available in the area that would fit these houses on that would not have such a disruptive effect. Trying to carry out a nearby 10% biodiversity net gain would be a near impossibility on this plot of land.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: land being used for building (60 homes). The properties would be subject to odours emitting from the Anglian Water sewage treatment works in front of the site.</p> <p>This land has a great deal of biodiversity and is quite unique in this area. It is well established and would be really difficult to replicate.</p> <p>It would close the settlement gap between Cromer and East Runton which means towns and villages lose their identity.</p> <p>There must be other land available in the area that would fit these houses on that would not have such a disruptive effect. Trying to carry out a nearby 10% biodiversity net gain would be a near impossibility on this plot of land.</p>
Officer Response	<p>Comments noted: The proposed allocation is restricted through policy to approximately 70 dwellings. The Policy includes requirements to mitigate impacts from the WRC. The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast.</p> <p>It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation and the policy requirements of a minimum 10 BNG could be achieved. The open space elements of the site would benefit from management to improve attractiveness, access and species richness. The site is adjacent to the existing settlement boundary and build form of Cromer and is not part of any designated gap or buffer.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC401
Response Date	18/12/2024 17:19:17
Full Name	Miss Claire Pettit
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am objecting once again to this proposal to develop this land west of Clifton Park . I cannot believe this site which is such an asset to Cromer and its visitors is even being considered again after the weight of objections last time it was put forward . There are other places which are much more suitable . There is a big empty site the other side of Clifton Park which never gets a mention but could be used for development maybe . If we lose this beautiful green space to housing and it is not preserved for the future then Cromer will be poorer for it . Development should end at the Clifton Park boundary and not creep any further towards East Runton. This site has been used and enjoyed by many people for years and is a haven for wildlife and plants if left alone to continue .</p>
Do you consider it necessary to participate in a public hearing	Yes

session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: There are other places which are much more suitable. Development should end at the Clifton Park boundary and not creep any further towards East Runton. This site has been used and enjoyed by many people for years and is a haven for wildlife and plants if left alone to continue.
Officer Response	<p>Comments noted: The site is adjacent to the existing settlement boundary and build form of Cromer and is not part of any designated gap or buffer. The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the existing biodiversity, ecology and open space as well as retaining public access.</p> <p>Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing. Site selection follows a set methodology based around suitability, deliverability and availability. A number of alternative options have been considered in identifying additional sites as detailed in Appendix 1 to this consultation [examination document FC002]. Background paper 6, examination reference C6 sets out the approach to site assessment and selection.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC402
Response Date	06/12/2024 16:30:00
Full Name	Sheilagh McGowan
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	I wish to lodge an objection to the proposed development west of Clifton park. I would like to see it preserved as a green open space for wildlife, walkers, runners and dog walkers like myself.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: would like to see it preserved as a green open space for wildlife, walkers, runners and dog walkers like myself.
Officer Response	Comments noted: The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the existing biodiversity, ecology and open space as well as retaining public access.
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC403
Response Date	18/12/2024 17:37:00

Full Name	Mrs Michelle Uddin
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>This is a site of natural beauty with very diverse flora and fauna. There is always bird song on this site, the birds are diverse and include wren. The area has many rabbits which are a source of food for the beloved falcon from the church and well as useful to keep the grass down. There are deer which can be seen and heard. There are many different butterflies and insects. The area is truly diverse and should be protected for the future biodiversity of our area. If it was built on in any way it would upset the balance of the nature and ruin a natural unspoilt area.</p> <p>The site should be kept as it is to provide an area for walking. It is in near constant use by dog walkers, the area is good for people to socialise with their dogs (or without). It provides a superb wellbeing area, where people can enjoy nature - listening to the birds and other animals and observing nature at its most untouched state, this is invaluable to the many who suffer with their mental health.</p> <p>The area provides a natural boundary between Cromer and East Runton, a boundary that should be observed. Cromer and Runtons should not merge.</p> <p>There are issues with access - Runton Road is currently quite a smooth running road, if access was to be granted near Clifton Park it would cause problems for their residents and also with the established caravan sites opposite and adjacent.</p> <p>There is a sewage treatment plant to the north of the site which can be very smelly, the smell travels across the land adjacent to Clifton Park. This would be very unpleasant for the proposed housing, the smell is directed by the wind so not controlable.</p> <p>The proximity to a railway line with no natural barrier at the field would cause excessive noise for the new development. The current houses are protected from the noise by the banks surrounding the railway line.</p> <p>The land which is green (open space) on the proposed plan currently has excellent natural drainage, after the recent heavy rains it drained quickly and was useable, I fear that putting a housing development so close could impact this and potentially cause future flooding to the open space the development and the railway line.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: This is a site of natural beauty with very diverse flora and fauna.- birds, rabbits, butterflies. If it was built on in any way it would upset the balance of the nature and ruin a natural unspoilt area. The site should be kept as it is to provide an area for walking and people to socialise with their dogs. This is invaluable to the many who suffer with their mental health. he area provides a natural boundary between Cromer and East Runton, a boundary that should be observed. Cromer and Runtons should not merge.</p>
Officer Response	<p>The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast.</p> <p>It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation and the policy requirements of a minimum 10 BNG could be achieved. The open space elements of the site would benefit from management to improve attractiveness, access and species richness. The site is adjacent to the existing settlement boundary and build form of Cromer and is not part of any designated gap or buffer.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC407

Response Date	18/12/2024 18:02:00
Full Name	Mike & Helen Clarke
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>My wife and I moved to Clifton Park early 2019. Part of the reason for our move was that the estate was surrounded by the common area which is a well known biodiverse site.</p> <p>We would object quite strenuously to any proposed building as that biodiversity would be lost. If there were no other building sites available I would understand but there are and they wouldn't impact in the same way.</p> <p>I would also suggest that the amount of traffic that would be exiting either onto Runton Rd or onto the Clifton Park estate would be problematic unless a roundabout were installed onto the Runton Road.</p> <p>The common is used constantly by dog walkers (ourselves included) and ramblers, as well as during March to October holiday makers walking from the Manor Farm Camp site to the coast. It would be such a shame if holidaymakers find the appeal of the North Norfolk countryside tainted by the amount of housing getting closer to the crumbling coastline.</p> <p>I also assume someone has taken into account the fact that the coastline in front of the proposed development has no defences protecting it from the ravages of the sea and as we are seeing the effects of global warming greatly increasing weather events the erosion is likely to speed up rapidly. This is almost as bad as building on a flood plain, how long before we become like Hemsby?</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: Part of the reason for our move (2019) was that the estate was surrounded by the common area which is a well-known biodiverse site. If there were no other building sites available, I would understand but there are and they wouldn't impact in the same way.</p> <p>The common is used constantly by dog walkers (ourselves included) and ramblers, as well as during March to October holiday makers walking from the Manor Farm Camp site to the coast.</p> <p>would also suggest that the amount of traffic that would be exiting either onto Runton Rd or onto the Clifton Park estate would be problematic unless a roundabout were installed onto the Runton Road.</p> <p>Assume the fact that the coastline in front of the proposed development has no defences protecting it from the ravages of the sea has been taken into account.</p>
Officer Response	<p>Comments noted: English law has established that in most cases the potential impacts of a proposed development on private views is not a planning consideration. Private individuals do not have a right to a view and even if a new development significantly changes a view from a private property, this is not normally a legal ground on which planning approval can be refused. The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast.</p> <p>The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast. The assessment and proposed allocation policy has been informed in liaison with the Highways Authority and appropriate access can be achieved.</p> <p>The site is outside of the CCMA and south of the A149.</p>

Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC411
Response Date	18/12/2024 20:20:53
Full Name	David Shipstone
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I wish to add my objection to the proposed new site allocation on Runton Road. The reasons have been adequately covered by others on this consultation and the previous consultations concerning this piece of land, and I agree totally with all the reasons given. My main reason being the lack of infrastructure to cope with the population growth.</p> <p>I don't feel confident our objections will carry any weight this time because this clearly has been forced upon local government from National government, and they in turn are being steered by Globalist governance. This doesn't bode well for local democracy, consideration of the views of local residents and concern for wildlife and nature are becoming things of the past.</p> <p>I fear this "consultation" serves only to give the illusion of democracy.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: My main reason being the lack of infrastructure to cope with the population growth. I don't feel confident our objections will carry any weight this time because this clearly has been forced upon local government from National government, and they in turn are being steered by Globalist governance. This doesn't bode well for local democracy.
Officer Response	<p>Cromer is identified as a Large Growth Town in Policy SS1 and as such is where a higher proportion of new housing will be located. Locations such as these have primary, secondary education, healthcare facilities and large town centres which coupled with the extensive choice of convenience and comparison good shopping, good public transport and being the focus for commercial end employment investment perform a strong role as service centres and employment providers. As such the identified Large Growth Towns remain the most sustainable settlements and locations where growth should be directed.</p> <p>The delivery of health / education and wider infrastructure fall under the responsibilities of the relevant statutory bodies and starts with the proposals in a Local Plan.</p> <p>Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC419
Response Date	18/12/2024 21:49:47
Full Name	Paul Champion
Organisation	
Agent Full Name	
Agent Organisation	

<p>Does the Proposed Change contribute to the overall soundness of the Plan?</p>	<p>SEE ATTACHED FILES</p> <ul style="list-style-type: none"> Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1) I would like to object to the development of this piece of land on the following grounds This piece of land has been part of the natural landscape, for generations the people of Cromer have enjoyed its unique beauty. It forms a Natural break or gap between the town of Cromer and the Village of East Runton. The Village of East Runton sits firmly within the boundry of the Parish of Runton, although this Village is not identified as a small growth Village it already has plans in place for a substantial amount of new houses (33 houses on land opposite to the Dormy House Hotel) If this development goes ahead this in my opinion would be a massive overdevelopment of this lovely Parish. This piece of Land is unique, it has been left to rewild unlike the surrounding landscapes consisting of plain fields and farm land. This is why it must be protected. This piece of land is home to smal animals, birds and pollinators. The land has an abundanance of wild flowers that attract numerouse types of protected species. Many protected species use this land as a food source. Birds of prey, butterflys and Bats have been observed hunting for food on and around this piece of land. The development of this land in my opinion would contravene The Wildlife and Country side Act. The local community has accessed this land for decades it has been a source of enjoyment and a sanctuary for people that have suffered with emotional problems or just enjoy there right to roam (The Country Side and Rights of Way Act 2000). This piece of land has been identified by the land owner as a greenfield site (reference communication between the Land owners agents and NNDC January/February 2023) In January 2023 the Landowners/Agents instructed a land clearance company to completly clear the entire landscape, this devistated habitats of small animals, invertibrats and pollinators. There was little or no warning and no sinage or notice was given. Heavey machinery was driven across the land including bridleway and footpath with little respect for walkers safety. Local residents observed small animals trying to escape but sadly not all managed to get away and some were squashed under the large industrial machines wheels. Allegedly this was an attempt by the Landowners/Agents to remove the biodiversity and wildlife from the land. This Land falls within the National and Local Natural Landscape National Landscapes are designated Areas of Outstanding Natural Beauty (AONB) - they are protected under the 1949 National Parks and Access to Countryside Act. Its protection is further enhanced by the Countryside and Rights of Way Act, 2000. To my knowledge There are several other alternative brown field sites that should be developed before any greyfield or greenfield site is considered. I have attached some pictures of sites that have been left abandoned for as long as i can remember. These sites can be purchased using the power of CPO (Compulsory Purchase Act 2004) the land owner can be compenstated through the (Leveling up and Regeneration Act 2023) Compulsory purchase is a legal mechanism by which certain bodies can acquire land without the consent of the owner. The ability to purchase land using CPO powers is essential for large scale projects to improve local infrastructure. The Plan states that more houses are needed in Cromer in order to improve the local economy, the plan states that there are sufficient job oppertunities to support this development. A search of Find a job on the DWP website reveals 17 Jobs, mostly minimum wage in the care, retail or hospitality industry. The plan states that the development will be of mixed housing consisting of affordable and social housing. Considering the dynamic of the Cromer area lends itself to Job's mainly in the care, retail and hospitaity industry, these industries are low pay minimum wage industries. This would mean that people purchasing these properties will need to travel further afield to gain employment in industries the pay higher wages, this proposed development would increase the amount of vehicles using already overcrowded roads this would be in conflict with the (Environment Act 2021) . In summary this land is so important to the people of Cromer but also for visitors to this beautiful landscape, it is a unique piece of local landscape and must be preserved for current and future generations.
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	<p>Yes</p>
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	<p>We live in country that believes in freedom of speach, its part of our british values. We as residents need to have our say on how our local community is shaped, we need to express our feelings and put our veivs.</p>

File (where submitted)	IMG_0356.jpg IMG_0355.jpg
Officer Summary	<p>Object: It forms a Natural break or gap between the town of Cromer and the Village of East Runton.</p> <p>The Village of East Runton sits firmly within the boundary of the Parish of Runton, although this Village is not identified as a small growth Village it already has plans in place for a substantial amount of new houses (33 houses on land opposite to the Dormy House Hotel) If this development goes ahead this in my opinion would be a massive overdevelopment of this lovely Parish.</p> <p>It has been left to rewild unlike the surrounding landscapes consisting of plain fields and farm land. This is why it must be protected. Has an abundance of wild flowers, birds butterflies etc and is a sanctuary to those with emotional problems.</p> <p>In January 2023 the Landowners/Agents instructed a land clearance company to completely clear the entire landscape, this devastated habitats of small animals, invertebrates and pollinators. There was little or no warning and no signage or notice was given. This Land falls within the National and Local Natural Landscape National Landscapes are designated Areas of Outstanding Natural Beauty (AONB).</p> <p>To my knowledge There are several other alternative brown field sites that should be developed before any greyfield or greenfield site is considered. Pictures attached - These sites can be purchased using the power of CPO.</p> <p>The plan states that the development will be of mixed housing consisting of affordable and social housing. DWP website reveals 17 Jobs . Considering the dynamic of the Cromer area lends itself to Job's mainly in the care, retail and hospitality industry, these industries are low pay minimum wage industries. People purchasing these properties will need to travel further afield to gain employment in industries the pay higher wages, this proposed development would increase the amount of vehicles using already overcrowded roads this would be in conflict with the (Environment Act 2021).</p>
Officer Response	<p>Comments noted: Whilst located within East Runton Parish, the site is immediately adjacent to Cromer's settlement boundary and therefore relates more to Cromer than to East Runton. The operation of Policy SS1 Spatial Strategy does not relate to parish boundaries but relies upon the defined settlement boundaries for the Selected Settlements. The defined settlement boundaries, including for Cromer and East Runton can be found on the Policies Map [Examination ref. A2]. In addition, settlement boundary reviews for the Small Growth Villages are evidenced in Background Paper 11 [Examination ref.C11]. Given the settlement boundaries for Cromer and East Runton, the proposed site allocation at Clifton Park, adjacent to the settlement boundary of Cromer, would be in accordance with Policy SS1 and would not conflict with the operation of the Small Growth Village approach set out in criterion 3 of the policy. It understood that an outline application currently under consideration in relation to the area mentioned.</p> <p>It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation.</p> <p>It's known that the site was cleared in the recent past, however the site does not fall under any landscape designation.</p> <p>The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the districts existing and future identified needs for all types of development. Any development proposals will also have to accord with Policy HOU2 which sets out the required market and affordable housing mix and is aligned with the level of needs to ensure that the type, size and tenure of homes provided closely matches the existing and predicted future needs of the local population.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC430
Response Date	19/12/2024 08:20:00
Full Name	David Harper
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	I do not support the inclusion of this small site for development. The entire area (both development allocated and open space) is of high biodiversity value and creates an important gap between settlements.

Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	I am willing to speak on the biodiversity value
File (where submitted)	
Officer Summary	Object: I do not support the inclusion of this small site for development. The entire area (both development allocated and open space) is of high biodiversity value and creates an important gap between settlements.
Officer Response	Comments noted: The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation. The proposal also restricts development to the front section of the site and reduces the development impacts on the areas of existing Scrubland. Any application would be subject to policy compliance around open space/green infrastructure and biodiversity net gain.
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC439
Response Date	19/12/2024 09:58:11
Full Name	Mrs Julie Bell
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>My concern for the development of houses on this site is the effect this will have on the biodiversity of the landscape. I frequently walk on this area and very often see munt jacks roaming about along with other animals and birds. It is a very picturesque site and very relaxing with the plants and flowers that have regrown after the traumatic clearance of the site. It would be ideal if this site could be protected for a wildlife site.</p> <p>Another concern I have is that there will be no demarcation between Cromer and East Runton.</p> <p>Another consideration surely has to be the sewage treatment works closeby. Can it cope with the extra drainage needs but most importantly is the smell that comes from it.</p> <p>As I am a resident on Clifton Park I am very concerned about the amount of vehicles that will add to the already busy road. If the development is for 70 houses at 2 cars per house that is an additional 140 vehicles going in and out of Clifton Park. I live on a quiet cul de sac (which is the reason I purchased the property along with being able to use the land for walking my dog) and do not want to see this opened up with additional vehicles going past my property.</p> <p>Another thing to consider is the land could be contaminated by vehicles that were broken down in World War II this would surely have an effect on any properties that were built on there.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	

Officer Summary	Object: concern for how this will affect biodiversity of the landscape. It is a very picturesque site and very relaxing with the plants and flowers that have regrown after the traumatic clearance of the site. there will be no demarcation between Cromer and East Runton. Impact on CWS and the additional cars (up to 140) on Clifton Park. I live on a quiet cul de sac (which is the reason I purchased the property along with being able to use the land for walking my dog) and do not want to see this opened up with additional vehicles going past my property.
Officer Response	The site does not form part of any designated gap or buffer. The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the existing biodiversity, ecology and open space as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast.
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC441
Response Date	19/12/2024 10:15:01
Full Name	Mr William Page
Organisation	Planner Pigeon Investment Management Ltd
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILE Pigeon and the landowners fully support the inclusion of the Land at Runton Road/Clifton Park ('C10/1 – Proposed Change 1') as an additional allocation site. The Site will provide a high-quality landscape and design-led sustainable scheme on the western edge of Cromer. It will deliver an extensive package of town-wide benefits including: <ul style="list-style-type: none"> • Provision of a visually attractive western gateway to the vibrant coastal town of Cromer. • Conservation of the green gap between East Runton and Cromer, through landscape-led proposals. • Provision of extensive areas of enhanced publicly accessible green space to the south of the Site, comprising a variety of natural features. • Improvements to the Site's ecology delivering biodiversity net gain of at least 10%. • Protection and enhancement of ecology through ongoing management of open space/habitats on-site. • Enhanced connectivity with the surrounding area via a network of footpaths and cycleways, including connections to existing PRoWs. • Delivery of around 70 new homes that will range in type, tenure and size, and reflect the local housing need. Please find attached a Vision and Delivery Statement. This demonstrates that the land is immediately available for development, is free from any overriding constraints and is viable taking into account all emerging policy requirements. There are no legal, ownership or other known impediments to prevent the early delivery of new homes on the Site, and the scheme has been informed by a comprehensive assessment of the Site's context and appropriate surveys.
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	Participation in the hearing sessions will provide an opportunity for Pigeon to answer any queries on the proposed allocation of the site at Land at Runton/Road Clifton Park. Therefore, we would welcome an opportunity to take part in these sessions.
File (where submitted)	Pigeon - Cromer Vision & Delivery Statement 19122024.pdf

<p>Officer Summary</p>	<p>Support: The Site will provide a high-quality landscape and design-led sustainable scheme on the western edge of Cromer. It will deliver an extensive package of town-wide benefits including:</p> <ul style="list-style-type: none"> • Provision of a visually attractive western gateway to the vibrant coastal town of Cromer. • Conservation of the green gap between East Runton and Cromer, through landscape-led proposals. • Provision of extensive areas of enhanced publicly accessible green space to the south of the Site, comprising a variety of natural features. • Improvements to the Site's ecology delivering biodiversity net gain of at least 10%. • Protection and enhancement of ecology through ongoing management of open space/habitats on-site. • Enhanced connectivity with the surrounding area via a network of footpaths and cycleways, including connections to existing PRoWs. • Delivery of around 70 new homes that will range in type, tenure and size, and reflect the local housing need. <p>Please find attached a Vision and Delivery Statement. This demonstrates that the land is immediately available for development, is free from any overriding constraints and is viable taking into account all emerging policy requirements. There are no legal, ownership or other known impediments to prevent the early delivery of new homes on the Site, and the scheme has been informed by a comprehensive assessment of the Site's context and appropriate surveys.</p>
<p>Officer Response</p>	<p>Support noted. The commitment to addressing the policy requirements are welcome. The Council will continue to engage with site promoters to ensure the sites delivery and adoption into the Local Plan and that subsequent proposals address the planning requirements along with those of public concern.</p> <p>The attached Vision Statement details the intention to provide high quality landscape and design led sustainable scheme and re confirms the immediate availability and that the site is free from any overriding constraints and advises that the document has been informed by a comprehensive assessment of the site's context and appropriate surveys.</p> <p>The Vision Statement advises that:</p> <p>The site is in a highly sustainable location on the western edge of Cromer. Whilst the site administratively falls within the parish of Runton, it is physically separate from East Runton to the west and forms a natural extension to Cromer, with existing built form lying adjacent to the eastern boundary of the site.</p> <p>The Town Centre, which provides a wide range of services and facilities, is located approximately 1.2km/ approximately 16 minutes' walk to the east of the site and is accessible by foot/cycle via an existing footpath along the A149/ Runton Road. Local services and facilities include a post office, significant retail provision, schools and nurseries, doctors' surgeries and dental practices, as well as several sports clubs/ facilities. Furthermore, new connections onto Mill Lane, Fulcher Avenue and Sandy Lane, to the southeast, will provide high levels of connectivity with the wider town.</p> <p>The site is located in a highly sustainable location to the east of Cromer. A convenient and safe vehicular access will be achieved off Clifton Park, which in turn is accessed of the A149 Cromer/ Runton Road. The form of the access will be via an extension to the turning head off Clifton Park, approximately 55m south of the junction of Clifton Park and the A149. Norfolk County Council Highways compliant visibility splays exist to Clifton Park and Crashmap data indicates no incidents have taken place within close proximity to the site, within the most recent 5-year period. The access point is therefore achievable and safe.</p> <p>The Vision Statement also confirms that "PROWs will be retained and advises that the site is accessible from a number of Public Rights of Way (PRoW), with some of these passing through the site. The presence of these PRoWs provides an alternative, attractive and traffic free route to both Cromer and Runton as well as walking routes and connectivity with the surrounding countryside. The PRoWs that pass through the site will be retained and enhanced, providing landscaped corridors to create an attractive environment and promote healthy and active lifestyles", the illustrative Framework Masterplan on page 25 provides more detail on open space and walking routes including the intention to provide on-site enhancements which will also go some way to meeting the diversionary aims of the Enhanced Green infrastructure required for recreational avoidance in line with the Councils Recreational Impact Strategy on European sites.</p> <p>In terms of Landscape impact, the professional assessment by Landscape and Visual Assessment (LVA) prepared by Liz Lake Associates (LLA) supports the Council's position that the site is largely contained by existing development and permanent physical features, including the railway to the south and the current western edge of Cromer to the east, which forms a somewhat abrupt and stark entrance to the town. The site, therefore, represents an opportunity to enhance that position and create an attractive gateway into the town. It also reconfirms that the intention is for "Development to avoid the southernmost parts of the site,</p>

which will instead comprise areas of publicly accessible open space. The report confirms that there is capacity within the landscape to absorb the change that development of the site would bring, and that there are few constraints in landscape and visual terms that would prevent the site being developed”.

In terms of Ecology the document summarises an Ecological Appraisal by Hopkins Ecology undertaken in 2024 concluding that there are no ecological constraints that would prevent delivery of the site. The document concludes that “The site is typical of derelict and unmanaged land, with an abundance of scrub, vegetation and habitats of lower importance and the majority of the site falls within the category of neutral grassland”.

The statement advises that the “Species scoped in as potentially present are foraging bats, common nesting birds, reptiles and a small assemblage of invertebrates, however the potential presence of these species does not present a constraint to delivery. The substantial areas of open space proposed will largely comprise open grassland and scrub, as a continuation of the existing habitats for species potentially present on-site. Due to proposed ongoing management of this open space, long-term security for these species would be provided as a key long-term benefit of the scheme.”

In line with policy requirements the document also advises that “Extensive landscape enhancements, SuDS, enhanced hedgerows and new native tree and shrub planting will be provided. All of these features will ensure delivery of a biodiversity net gain (BNG) in excess of 10%.”

The review also advises that “The site is classified as very low risk of flooding from all sources and that the site can be delivered with a sustainable approach to the management of surface water run off”.

The document advises that a 100m cordon exists to the Cromer site around the WRC as advised by Anglian Water and that the scheme is approx. 200m away from the boundary of the site. It’s confirmed that that as part of any application an odour assessment will be undertaken and the scheme informed by this (as required by the site allocation policy).

Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC444
Response Date	17/12/2024 13:38:00
Full Name	Richard Hewitt
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Local Plan Consultation response on aspects of the following ‘areas of concern’:</p> <ul style="list-style-type: none"> • Housing need and supply - considering options to provide additional dwellings over an adjusted Plan period of 2024 to 2040 to address an identified housing shortfall and to allow for flexibility and contingency across the Local Plan period. • Spatial strategy - considering a range of options to broaden the ‘Small Growth Villages’ element of the settlement hierarchy to allow for additional growth and opportunity for villages to grow and thrive. <p>INTRODUCTION</p> <p>The Inspector has:</p> <ul style="list-style-type: none"> - challenged the Council to change its draft to enable more development in a dozen small growth villages identified in the district, and - asked that the Clifton Park land be revisited yet again. <p>This response considers these issues.</p> <p>SUMMARY</p> <p>The apparent housing level under consideration is 90. The land has been assessed through the plan process to date and firmly rejected at local level. The decisions made have not been negative in nature, but have stressed that the irreplaceable positive attributes of the land involved are of far greater long-term importance. The rationale has been restated again and again:</p> <p>THE ‘LAND VALUE’ – not in £’s!!</p> <ul style="list-style-type: none"> • The intrinsic value of the natural landscape, emphasised by the consistent landscape character assessments, through previous local plan cycles and up to this point of the plan process – a period of several decades. <i>This informal ‘common’, lies, sympathetically, between the developed area, the AONB and the neighbouring Runtons.</i> • The - policy led – importance of separation of settlements, East Runton from Cromer.

- The importance of the settlement development boundary, with this land beyond a boundary which has been in place for 50 years.
- To the extent that the land is within East Runton parish, a development of 90 properties in a village with a population of 750 (2021 census) borders on obscene overdevelopment.
- The proximity of the often foul smelling AWA sewage works.
- The wildlife haven. (The indiscriminate razing of the land, whilst hideous to see, did at least give a glimpse into the bleak future if the land is developed.
- The glorious, well used, amenity and recreational value for the local community, comprising residents, day visitors, holiday makers, mobile home owners and users. It is worthy to note that, but for the landowner's hostile 'declaration' made in 2015, this land would be a designated 'village green', based on the level of public use over generations, evidence of which underpinned the recent successful (contested) Public Right of Way applications across the land.

PLANNING ASSESSMENT

There is unanimity locally that this land should continue to be recognised and appreciated long into the future. Save for the landowner, there is no desire locally for this land to be developed. Indeed, from residents, visitors, Members, wildlife and ecology interested parties, the desire is to see the land formally designated as a wildlife and amenity space.

In summary, development of this land would not be even under consideration but for the Inspector's request, in response to Promoter submissions, that the land be revisited for wholesale development as a major housing site.

This local plan process, if it is to have integrity as a local plan, must recognise the importance of the land, and Members of the Council are charged with continuing to assert this position in any way possible, with overwhelming local support.

'REQUIRED' PROVISION

Having stressed the quality of the – literally irreplaceable – land, the task is to meet the housing requirement head on and place that additional housing number (<90) elsewhere.

Developing the Clifton park land would be a lazy approach to what should be a long term sophisticated process.

Thankfully, the solution – which leaves the land untouched – is twofold - and simple.

- Firstly, the numerical allocations given to other sites can be reviewed and increased to accommodate some of that number, the other Cromer sites being far better placed in relation to local schools, hospitals, vets, sports facilities, etc. etc., than the Clifton Park land!
- Secondly, by embracing the Inspector's request for further definition and potential development in 12 villages in the District, Members can create housing delivery in those villages of a modest sustainable scale linked to the preservation and enhancement of the pus shops schools and other facilities found in such communities – exactly as the Inspector clearly wishes to see.

It is easy to envisage 90 additional dwellings by these methods - the key being for Officers to develop the 'villages policy' by including development boundaries for the 12 villages in the consultation response, and setting out clear criteria for highlighting sites within those new boundaries for say 6 to 10 unit developments that enhance those communities.

Such smaller sites are the mainstay of local developers, who employ local staff, source materials locally and are often able to take the sites forward quickly without recourse to bank funding. Such businesses are flexible and adaptable investing in the local economy in a way that large scale developers have no interest in doing. Supporting local business in this way is clearly supported by policy.

Such an approach deals - in a positive way - with the 'growth villages' policy requirements set out by the Inspector.

To complete the response to the Inspector, the requested review of the Clifton park land as a development site needs to conclude – which is obvious – that there is too much at stake to allow this to go any further, and that such a wholly negative, hostile, proposal is unnecessary, when positive, balanced, alternatives exist as set out.

CONCLUSION

By taking this bold, fully supported, approach to the Inspector's letter:

- the Council is - reflecting universal opinion – ensuring that the Clifton park land can be safeguarded – including by adopting a formal wildlife/ecology designation - for all the 'material planning considerations' set out repeatedly.
- the 'growth villages' policy is fully embraced which the Inspector will welcome;
- the 90 units will be delivered in positive locations, fully in keeping with the broader settlement and sustainability themes of the local plan.
- The local plan can be delivered as just that – a plan for our district with full community support.

Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: The apparent housing level under consideration is 90. The land has been assessed through the plan process to date and firmly rejected at local level due to The intrinsic value of the natural landscape, The - policy led – importance of separation of settlements, East Runton from Cromer, the importance of the settlement boundary which has been in place for 50 yrs, and the informal 'common', lies, sympathetically, between the developed area, the AONB and the neighbouring Runtons.</p> <p>To the extent that the land is within East Runton parish, The proximity to the WRC. The wildlife haven. (The indiscriminate razing of the land, whilst hideous to see, did at least give a glimpse into the bleak future if the land is developed. well used, amenity and recreational value.</p> <p>There is unanimity locally that this land should continue to be recognised and appreciated long into the future. Save for the landowner, there is no desire locally for this land to be developed. Indeed, from residents, visitors, Members, wildlife and ecology interested parties, the desire is to see the land formally designated as a wildlife and amenity space.</p> <p>Development of this land would not be even under consideration but for the Inspector's request, in response to Promoter submissions, that the land be revisited for wholesale development as a major housing site</p> <p>Having stressed the quality of the – literally irreplaceable – land, the task is to meet the housing requirement head on and place that additional housing number (<90) elsewhere. Developing the Clifton Park land would be a lazy approach to what should be a long term sophisticated process.</p> <p>Solution: The numerical allocations given to other sites can be reviewed and increased to accommodate some of that number. By embracing the Inspector's request for further definition and potential development in 12 villages in the District, Members can create housing delivery in those villages of a modest sustainable scale linked to the preservation and enhancement of the pus shops schools and other facilities found in such communities – exactly as the Inspector clearly wishes to see. It is easy to envisage 90 additional dwellings by these methods. The key being for Officers to develop the 'villages policy' by including development boundaries for the 12 villages in the consultation response and setting out clear criteria for highlighting sites within those new boundaries for say 6 to 10 unit developments that enhance those communities.</p>
Officer Response	<p>Comments noted: The proposed allocation is restricted through policy to approximately 70 dwellings. The site does not form part of any policy led or designated gap / open land area or buffer. The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the existing biodiversity, ecology and open space as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast.</p> <p>Site selection follows a set methodology based around suitability, deliverability and availability. A number of alternative options have been considered in identifying additional sites as detailed in Appendix 1 [examination document FC002]. Background paper 6, examination reference C6 sets out the approach to site assessment and selection. The consultation includes further additional proposals to address growth in SGVs and increase housing delivery to meet the Councils housing requirements.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC448
Response Date	18/12/2024 19:28:00
Full Name	Selda & David Norgate & Colbourne
Organisation	
Agent Full Name	
Agent Organisation	

Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am writing to raise my concerns against the proposed planning for the following areas:</p> <p>The land west of Clifton Park</p> <p>The land south of Cromer</p> <p>My main concerns with the planning proposal for these areas are the following:</p> <p>Loss of biodiversity - yet more land for nature that will be lost and nature is already in crisis. This is an area of national beauty - this should be protected not built upon simply because it is there. Can alternative brown sites be considered?</p> <p>What Infrastructure is in place for this with regards to support this new housing? It is already extremely challenging to get a GP appointment already, there is a shortage of dentists, the hospital services are stretched as well as many other local services and the nearest hospital for A and E is the NNUH where wait times are increasing all the time.</p> <p>Cromer will lose its rural charm - this will greatly impact the tourist industry, especially as the public footpaths and green spaces will be lost</p> <p>Addressing the second home issue would also be beneficial</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: main concerns are: loss of biodiversity - yet more land for nature that will be lost and nature is already in crisis. This is an area of national beauty - this should be protected not built upon simply because it is there. Can alternative brown sites be considered?</p> <p>What Infrastructure is in place for this with regards to support this new housing? It is already extremely challenging to get a GP appointment already, there is a shortage of dentists, the hospital services are stretched as well as many other local services and the nearest hospital for A and E is the NNUH where wait times are increasing all the time. Cromer will lose its rural charm - this will greatly impact the tourist industry, especially as the public footpaths and green spaces will be lost. Addressing the second home issue would also be beneficial.</p>
Officer Response	<p>Comments noted: Site selection follows a set methodology based around suitability, deliverability and availability. A number of alternative options have been considered in identifying additional sites as detailed in Appendix 1 [examination document FC002]. Background paper 6, examination reference C6 sets out the approach to site assessment and selection.</p> <p>The delivery of health infrastructure falls under the responsibilities of the relevant statutory bodies and starts with the proposals in a Local Plan. The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning In Health Protocol which promotes a collaborative way of working between the ICB estates team and health partners, Public Health, Local Planning Authorities (LPAs), and helps ensure the impacts on health and care services from local plans and a growing population are measured, understood, mitigated, and managed appropriately by the delivery bodies which are informed through local Plans.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC467
Response Date	19/12/2024 09:30:00
Full Name	Mrs Jane Wisson
Organisation	Town Clerk Cromer Town Council
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p><u>CLIFTON PARK</u></p> <p>The inclusion of Clifton Park raised concerns for us as Councillors, but we have also been contacted by several residents who have also raised significant concerns about this site.</p>

The area which you have identified provides a very clear demarcation between two distinct settlements along the North Norfolk Coastline. This development would impact these two settlements by decreasing the unique characteristics and would lose the clear definition and perception of the two, one being a Town the other is a Parish.

The allocation of this land under the Local Plan for development would impact the environmental aspect that this area provides and should allow for the area to be complimentary to the Norfolk Coast National Landscape (former AONB) and build on the very distinctive biodiversity of this particular site. This would mean that this particular stretch of landscape would be lost for our future generations and would impact on the Landscape significantly. The current concerns for this area of coast which has seen coastal erosion and the impact from climate change will have a significant and long-lasting impact.

The Fauna and flora along with invertebrates are unique and the site has seen some extinct species return to enjoy the habitat and local and national ecologists are extremely concerned about its loss, and we feel that this site should be considered for a Norfolk Wildlife site to ensure that the site is protected for now and in the future.

The site is also adjacent to treatment works and we are concerned for any residents as the odour during treatments is very strong and may cause health issues for the residents who may purchase properties. Whilst this process may be sustainable at this site in the shorter term further up the coast the other sites would definitely struggle and the impact for the area and the pollution this may bring is substantial.

The site is also known to have been used in the 2nd world war for the breakdown of 'vehicle' military equipment and the contamination this may have caused could be significant – this would need further investment in the investigation and testing to ensure that the issues are addressed before the site may be considered for use.

Whilst we realise that the following issues are discussed separately, we feel that they should be mentioned with our submission as to why this site is not a viable option. The additional impact these and the next site will have on local infrastructure around the following areas

NHS – the impact on the current Doctors surgery as well as the lack of NHS dentists available for residents in Cromer and the local area. This in turn will also have an impact on the local hospital appointments. The current infrastructure is at its limit and whilst we realise it doesn't form part of the Planning Inspectors decision making it does have a huge impact on the town.

Economy – whilst both sites will increase some spend in the towns/parishes the lack of sustainable jobs in an area that has a significant number of seasonal positions rather than longer term. The area is also renown for the vast volume of second homes which whilst does support the economy it doesn't significantly enhance the investment that would be otherwise needed.

Highways – The Clifton Park site will either need to access via the main coast road A149 which in the Summer is extremely busy and would be dangerous or on a side road which can experience high volume of traffic congestion.

The Norwich Road site will have a significant impact on the Health and Safety of local residents especially children walking to local schools as the road network currently does not provide a safe crossing space in this area. Mini roundabouts will be needed to ensure safety for cars entering and exiting from various locations along that stretch of road and reduction in speed limits will be needed.

Flooding has also been recorded as an issue on this particular area and would need further investigation if these additional houses and the impact they may have.

Affordable Housing – ours and our residents concerns are about affordable housing for the current community that whilst developers and developments are asked to provide historically this doesn't seem to come to fruition. The lack of powers to ensure that the agreed amount of these houses is set aside for local people to obtain access to is minimal if any at all. So, residents are unable to stay near family support but have to move elsewhere. If these developments are to go ahead additional and increased enforcement powers are needed to ensure that this issue is further addressed. North Norfolk has a severe issue with homelessness this will just add to the problem unless addressed.

So, in conclusion Cromer Town Council does not support the inclusion of the Clifton Park Site in the Local Plan at all and would request alternatives sites are relooked at. We also would ask that the planned increase on the Norwich Road/Roughton Road site is maintained at the previous housing levels rather than increasing the settlement numbers and further work is investigated around the current infrastructure to ensure that it is sustainable in the longer term.

Do you consider it necessary to participate in a public hearing session, should these be required?

<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>Object: The area which you have identified provides a very clear demarcation between two distinct settlements along the North Norfolk Coastline. This development would impact these two settlements by decreasing the unique characteristics and would lose the clear definition and perception of the two, one being a Town the other is a Parish.</p> <p>The allocation would impact the environmental aspect that this area provides and should allow for the area to be complimentary to the Norfolk Coast National Landscape (former AONB) and build on the very distinctive biodiversity of this particular site. This would mean that this particular stretch of landscape would be lost for our future generations and would impact on the Landscape significantly.</p> <p>The current concerns for this area of coast which has seen coastal erosion and the impact from climate change will have a significant and long-lasting impact.</p> <p>The Fauna and flora along with invertebrates are unique and the site has seen some extinct species return to enjoy the habitat and local and national ecologists are extremely concerned about its loss, and we feel that this site should be considered for a Norfolk Wildlife site to ensure that the site is protected for now and in the future.</p> <p>Concerned for any residents as the odour during treatments is very strong and may cause health issues for the residents who may purchase properties. Whilst this process may be sustainable at this site in the shorter term further up the coast the other sites would definitely struggle and the impact for the area and the pollution this may bring is substantial.</p> <p>The site is also known to have been used in the 2nd world war for the breakdown of 'vehicle' military equipment and the contamination this may have caused could be significant – this would need further investment in the investigation and testing to ensure that the issues are addressed before the site may be considered for use.</p> <p>The additional impact these and the next site will have on local infrastructure around the following areas including NHS: - the impact on the current Doctors surgery as well as the lack of NHS dentists available.</p> <p>Economy:– whilst both sites will increase some spend in the towns/parishes the lack of sustainable jobs in an area that has a significant number of seasonal positions rather than longer term. The area is also renowned for the vast volume of second homes which whilst does support the economy it doesn't significantly enhance the investment that would be otherwise needed.</p> <p>Highways: need to access via the main coast road A149 which in the Summer is extremely busy and would be dangerous or on a side road which can experience high volume of traffic congestion.</p> <p>Flooding: has also been recorded as an issue on this particular area.</p> <p>Affordable Housing : ours and our residents concerns are about affordable housing for the current community that whilst developers and developments are asked to provide historically this doesn't seem to come to fruition</p> <p>Request alternatives sites are relooked at.</p>
<p>Officer Response</p>	<p>Comments noted: The site does not form part of any designated gap, open land area or buffer. Large parts of the land between Cromer and East Runton referred to is already developed and adjacent to the site lies the Seacroft Caravan and Motorhome camp site, various outbuildings. Other residential development lies adjacent to the site to the east and there are various other large-scale caravans in the immediate vicinity that remain prominent in the wider Landscape. The wider and adjacent landscape also accommodates residential housing, most of which is appropriately screened.</p> <p>The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The approach also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access. Further open land remains adjacent to the proposed site including wider local access to the coast.</p> <p>It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation and that the open space elements of the site would benefit from management to improve attractiveness and species richness.</p> <p>The delivery of health infrastructure falls under the responsibilities of the relevant statutory bodies and starts with the proposals in a Local Plan. The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning In Health Protocol which promotes a collaborative way of working between the ICB estates team and health partners, Public Health, Local Planning Authorities (LPAs), and helps ensure the impacts on</p>

	<p>health and care services from local plans and a growing population are measured, understood, mitigated, and managed appropriately by the delivery bodies which are informed through local Plans. Its recognised that the demographic of North Norfolk is aging and as such it remains important to ensure that the Local Plan sets out an appropriate framework to deliver the growth that is necessary to meet the Districts existing and future identified needs for all types of development and supports the local economy.</p> <p>The provision of affordable housing is required by policy and the site is expected to be in compliance with the policies set out in the Local Plan. Developer contributions where appropriate would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC469
Response Date	19/12/2024 09:38:00
Full Name	Mrs Jennifer Barrett
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I very recently lost my husband and we both responded to this idea in the past, it is such a beautiful setting between Cromer and East Runton both for animals birds & people.</p> <p>Once urbanised it cannot be put back.</p> <p>I also feel that it would not be housing for young families only for financial reasons.</p> <p>Although the new government is pushing for housing surely even they care about the environment.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: It is such a beautiful setting between Cromer and East Runton both for animals birds & people.</p> <p>Once urbanised it cannot be put back.</p> <p>I also feel that it would not be housing for young families only for financial reasons.</p>
Officer Response	Comments noted: The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the districts existing and future identified needs for all types of development.
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC477
Response Date	19/12/2024 11:58:00
Full Name	Cllr Tim Adams
Organisation	Member for Cromer Ward (NNDC)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>My objections to the site allocation are as follows:</p> <ul style="list-style-type: none"> - The site has particular biodiversity strengths and potential, as assessed by a number of people with expertise in this area. It has certainly come to the attention of ornithologists, but it's potential as a Norfolk County Wildlife site has been understood for some time. The

	<p>landscape is particularly rare in this locality, with unimproved grassland having enabled many different plants to thrive, and the wildlife that has followed. I don't feel the constraints in terms of biodiversity have been fully understood during consideration of the local plan, and the biodiversity present is evidenced by other comment submissions. It would be possible to provide the quantum of dwellings envisaged at C10/1 at a different location which would not have the same resulting impacts on biodiversity.</p> <ul style="list-style-type: none"> - Given the use of the land during and following the second world war for storage and breaking up of military equipment and vehicles, the possibility of contamination at this site needs to be understood. - It is undesirable to close the settlement boundary between built up areas of East Runton and Cromer, resulting in amorphous form of development between Cromer and the Runtons, and impacting the settlement character of both settlements, but particularly East Runton. Again, this undesirable impact could be avoided if an alternative site was allocated. - Any allocation of the site must account for the need to appropriately deal with drainage, given the proximity to the cliff top. Soakaway systems, SUDS etc may be wholly inappropriate in this location, and increased infiltration could impact on the stability of cliffs to the North. Again, this could be less of a factor at alternative sites. - Finally, I am concerned about the possibility of odour nuisance impacting residents of the envisaged development. The site is near to Cromer Water Treatment works at Middlebrook Way, and is known locally to experience odour issues, particularly on damp days. I would be concerned about the potential for increased statutory nuisance complaints both to the local authority, and to Anglian Water in the longer term. Other sites are less likely to have this constraint.
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>Object: The site has particular biodiversity strengths and potential, as assessed by a number of people with expertise in this area. The landscape is particularly rare in this locality, with unimproved grassland having enabled many different plants to thrive, and the wildlife that has followed. I don't feel the constraints in terms of biodiversity have been fully understood during consideration of the local plan, and the biodiversity present is evidenced by other comment submissions.</p> <p>It would be possible to provide the quantum of dwellings envisaged at C10/1 at a different location which would not have the same resulting impacts on biodiversity.</p> <p>Given the use of the land during and following the second world war for storage and breaking up of military equipment and vehicles, the possibility of contamination at this site needs to be understood.</p> <p>It is undesirable to close the settlement boundary between built up areas of East Runton and Cromer, resulting in amorphous form of development between Cromer and the Runtons, and impacting the settlement character of both settlements, but particularly East Runton</p> <p>Any allocation of the site must account for the need to appropriately deal with drainage, given the proximity to the cliff top.</p> <p>Concerned about the potential for increased statutory nuisance complaints both to the local authority, and to Anglian Water in the longer term. Other sites are less likely to have this constraint.</p>
<p>Officer Response</p>	<p>Comments noted: The council has reviewed all appropriate options in the context of the legislative and examination timelines as set out by the Planning Inspectorate. Site selection follows a set methodology based around suitability, deliverability and availability and informed by a sustainability appraisal and Habitat Regulation Assessment. A number of alternative options have been considered in identifying additional sites as detailed in Appendix 1 [examination document FC002]. Background paper 6, examination reference C6 sets out the approach to site assessment and selection and agreed following the appropriate Member sign off process. The inspector in his initial letter EH006f specifically comments on the need to review this sites previous exclusion as well as the need to review a number of other areas, so that the Plan in its entirety can meet the revised and increased objectively assessed identified needs of the district. This includes increasing the number of small growth villages and the proportion of housing growth in each.</p>

	<p>The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing.</p> <p>The site allocation includes the identification of large areas of open space and requires that in any proposal measures are included so that the land is managed in perpetuity in order to ensure local existing pedestrian links and access are maintained. The local plan policy approach (and now national policy) also requires a focus on retaining and enhancing much of the onsite and existing biodiversity and ecology as well as retaining public access in line with biodiversity net gain policies.</p> <p>It is considered that the site is typical of derelict and unmanaged land with scrub and other vegetation</p> <p>There is no policy context in relation to retention of gaps between settlements in the adopted or emerging Local Plan. Whilst located within East Runton Parish, the site is immediately adjacent to Cromer's settlement boundary and therefore relates more to Cromer than to East Runton and development would not close the "gap" between settlements.</p> <p>The Policy includes requirements to mitigate impacts from the WRC and the proposed indicative residential area is identified in the policy so that residential development is stepped back beyond the existing and adjacent residential developments. Any investment by Anglian Water should also assist in improving any existing local issues. The policy also requires the submission, approval and implementation of surface water management plan ensuring no adverse effects and increase in greenfield run off rates is required as part of the policy and application process. These matters are generally considered as part of any future application.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC507
Response Date	18/12/2024 06:54:00
Full Name	Susan Wilcox
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I would like to logged my objection to the plan of building homes on the wild life area by Clifton park.</p> <p>This area is unsuitable to build on as it is seen as a wild life haven and thus should be protected. I do believe that rare flowers/insects etc have been found there. The other reason is the holiday park opposite which gives much needed accommodation to holidaymakers visiting our town and spending their money. BUT if this becomes a housing estate then why would holidaymakers book into this site which could see a well used site for decades close.</p> <p>There is a more suitable site which is on what was the old Pye factory. It is in desperate need of clearing and making it a more better sight for our town. Homes on this site would be far more suitable as it once was a built on area.</p> <p>I appreciate more homes are needed but please look at the site, infrastructure and surrounding properties first. I have lived in Cromer for nearly 15 years and holidayed here since I was 5 years old please don't ruin our town by expanding just to give holidaymakers housing.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: This area is unsuitable to build on as it is seen as a wild life haven and thus should be protected. I do believe that rare flowers/insects etc have been found there. The other reason is the holiday park opposite which gives much needed accommodation to holidaymakers visiting our town and spending their money. BUT if this becomes a housing estate then why would holidaymakers book into this site which could see a well-used site for decades close. There is a more suitable site which is on what was the old Pye factory. I appreciate more homes are needed but please look at the site, infrastructure and surrounding</p>

	properties first. I have lived in Cromer for nearly 15 years and holidayed here since I was 5 years old please don't ruin our town by expanding just to give holidaymakers housing.
Officer Response	Comments noted: The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the districts existing and future identified needs for all types of development. The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing. Site selection follows a set methodology based around suitability, deliverability and availability. A number of alternative options have been considered in identifying additional sites as detailed in Appendix 1 [examination document FC002]. Background paper 6, examination reference C6 sets out the approach to site assessment and selection. Background paper D1 (Cromer) details the sites submitted into the Local Plan and their full assessment. Sites within the settlement boundary can come forward under existing policy.
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC520
Response Date	19/12/2024 11:06:00
Full Name	Tessa Saunders
Organisation	Spatial & Strategic Planning Manager Anglian Water
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILES</p> <p>As noted by the draft policy, the site is located close to Cromer/ Runton Middlebrook Way WRC. The site is within the wastewater consultation area, which is a buffer of 400m around the Cromer WRC. The Norfolk Minerals and Waste Core Strategy states that: "The distance to the boundary of a Consultation Area around key wastewater and sludge treatment facilities may be relaxed, following consultation with Anglian Water, on a case-by-case basis, depending on the nature of the works and the sensitivity of its location."</p> <p>Anglian Water's asset encroachment guidance can be found here. It advises that building next to water recycling centres may not always be in the best interests of the people who will have to live there in the future with smell likely to be one of the biggest risks in building close to these types of assets. Anglian Water has developed a way to assess the risks associated with proposed development close to our works.</p> <p>We use a risk assessment process (https://www.anglianwater.co.uk/~/media/anglianwater/~/media/asset-development/asset-encroachment-risk-assessment-methodology.pdf) to consider development within 400m of our WRCs to help inform potential developers and provide planning officers and elected councillors with the evidence-based findings to help inform policy-making and decision-taking processes. Based on the current population equivalent served by the WRC at Cromer, an encroachment buffer of <u>at least</u> 250m is necessary, which includes part of the site area identified for development.</p> <p>We would require that this is addressed appropriately in the site allocation policy, which is likely to have a bearing on overall number of dwellings on the site as there should be no dwellings or private garden space within the buffer to avoid impacts on sensitive receptors. The policy should require the developer to undertake the appropriate odour assessments and mitigation required in consultation with Anglian Water, to accord with the 'agent of change' principle.</p> <p>There is currently existing dry weather flow headroom at Cromer WRC to accommodate additional growth within the catchment. We agree with Clause 10 but suggest that it is reworded for clarity to state:</p> <p><i>The submission, approval and implementation of a Foul Drainage Strategy providing details of any enhancements and setting out how additional foul flows will be accommodated within the foul sewerage network and delivered demonstrating that there is capacity available in the sewerage network and at the receiving water recycling centre to accommodate wastewater flows from the site prior to occupation of any dwellings;</i></p> <p>The supporting text should explain that developers must undertake pre-planning engagement with Anglian Water at the earliest opportunity to assess infrastructure capacity, and any specific requirements that may be needed to deliver the proposed development, which may include sustainable points of connection to our water supply and wastewater networks to minimise impacts on existing communities and the environment.</p>

	In addition, within the proposed open space there are underground assets comprising a final effluent pipe and three rising mains. Appropriate policy measures should be applied to ensure that developers undertake early engagement with Anglian Water to safeguard our assets and take account of associated easements so these assets can be repaired and maintained as necessary.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	Anglian Water Response - Front Page 19.12.24.pdf Appendix 1 WRC Capacity and Dry Weather Flow.pdf
Officer Summary	<p>Anglian Water has developed a way to assess the risks associated with proposed development close to our works.</p> <p>We use a risk assessment process (https://www.anglianwater.co.uk/~/media/aw-content/development/assessments/risk-assessment-methodology.pdf) to consider development within 400m of our WRCs to help inform potential developers and provide planning officers and elected councillors with the evidence-based findings to help inform policymaking and decision-taking processes. Based on the current population equivalent served by the WRC at Cromer, an encroachment buffer of <u>at least</u> 250m is necessary, which includes part of the site area identified for development.</p> <p>We would require that this is addressed appropriately in the site allocation policy, which is likely to have a bearing on overall number of dwellings on the site as there should be no dwellings or private garden space within the buffer to avoid impacts on sensitive receptors. The policy should require the developer to undertake the appropriate odour assessments and mitigation required in consultation with Anglian Water, to accord with the 'agent of change' principle.</p> <p>here is currently existing dry weather flow headroom at Cromer WRC to accommodate additional growth within the catchment. We agree with Clause 10 but suggest that it is reworded for clarity to state:</p> <p><i>The submission, approval and implementation of a Foul Drainage Strategy providing details of any enhancements and setting out how additional foul flows will be accommodated within the foul sewerage network and delivered demonstrating that there is capacity available in the sewerage network and at the receiving water recycling centre to accommodate wastewater flows from the site prior to occupation of any dwellings;</i></p> <p>The supporting text should explain that developers must undertake pre-planning engagement with Anglian Water at the earliest opportunity to assess infrastructure capacity, and any specific requirements that may be needed to deliver the proposed development, which may include sustainable points of connection to our water supply and wastewater networks to minimise impacts on existing communities and the environment.</p> <p>In addition, within the proposed open space there are underground assets comprising a final effluent pipe and three rising mains. Appropriate policy measures should be applied to ensure that developers undertake early engagement with Anglian Water to safeguard our assets and take account of associated easements so these assets can be repaired and maintained as necessary.</p>
Officer Response	<p>Comments noted: Agree to consider modification and amend as necessary. See modification schedule. The policy already provides an indicative development area which approximately reflects the AW requirements. OT should be noted that the adjacent Caravan site and a further two residential sites are already closer than the suggested 250m buffer. The exacted amount of development and its location will be determined as part of any detailed planning application</p> <p>The policy already in clause 7 requires any application to have careful attention to form and site layout so as to mitigate the amenity impacts from the WRC. AW's support for clause 10 is welcomed and a modification(s) could be considered for reasons of clarity as suggested. Anglian Water remain a statutory consultee at development management stage.</p>
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC540
Response Date	18/12/2024 15:03:00
Full Name	Sarah Luff

Organisation	Norfolk County Council (Lead Local Flood Authority)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>The LLFA note that the sites that have been put forward as part of this review (referred to as Group A sites) are those sites which have been previously assessed through the Local Plan's Site Assessment Process and considered suitable for development but were not identified for allocation for reasons such as there being more sites than needed at the time for that specific settlement or, a different site in the same location provided better opportunities for community benefit.</p> <p>Please note that of the potential sites put forward as part of this consultation, a GIS shapefile has not been provided to the LLFA for one site (F05, Land between Holt and Greenway Lane, Fakenham) and as such this site has not been reviewed as part of this consultation. It is however noted that NNDC have since deemed this site unsuitable for inclusion.</p> <p>A comprehensive review of the remaining sites has been produced is attached, document title Appendix 2 FW2024_0840 – LLFA Response – Sites Review (Excel).</p> <p>Please note the LLFA's response is specific to surface water flood risk. No other sources of flood risk (including but not limited to fluvial and coastal flooding; flooding from artificial sources; groundwater flooding and sewer flooding) have been reviewed as part of this consultation.</p> <p>The following criteria have been used in our review, see appendix 2:</p> <p>Surface Water Flood Risk</p> <ul style="list-style-type: none"> • These have been reviewed for the 3.33%, 1.0% and 0.1% Annual Exceedance Probability (AEP) events for surface water flooding. • Where deemed necessary, site-specific comments have been provided. • Assessment of onsite flood risk is proportionate to the site size and the flood risk significance. <p>Reports of Internal and Anecdotal (inclusive of external) Flooding</p> <ul style="list-style-type: none"> • Reviewed with the LLFAs current flood records (which date back to 2011). • Onsite and flood records within 500m of the site boundary have been reported. • Please note all external flood records are deemed to be anecdotal. <p>Watercourses</p> <ul style="list-style-type: none"> • These have been reviewed and identified when onsite or within 100m proximity to the site boundary. • If a watercourse does not fall within the provided site boundaries (even if it is on the edge of the site boundary) this has been classed as offsite. • Watercourses have been defined (ordinary watercourse, main river etc) • We have not defined the ownership of the watercourses in this assessment. • We have not reviewed offline watercourses, blind ditches or pond features as part of this review. Further investigation will be needed to assess these features, their type and whether they are connected to the wider drainage network. • We have not defined whether the features are obstructed by housing or roads etc. <p>Surface and Foul Water Sewer Systems</p> <ul style="list-style-type: none"> • Reviewed against Anglian Water Services sewer mapping. • Both onsite and offsite surface water sewers with 100m of the site boundary have been reported. • We have not defined whether the features are obstructed by housing or roads etc. <p>Additional Information</p> <ul style="list-style-type: none"> • Source Protection Zones (SPZs) (If applicable) • Internal Drainage Boards (IDBs) (If applicable) <p>We have then reported:</p> <ol style="list-style-type: none"> 1. Would local flood risk/surface water drainage constraints be severe enough to prevent development of the site? 2. Recommendations ranging from standard information required at planning through to requiring review and potential removal if deemed appropriate. <p>Where appropriate, we have provided additional site-specific comments. For ease of use, we have produced a traffic light system based on the recommendations column:</p> <ul style="list-style-type: none"> • Red - Recommend a review of the site and potential removal from the local plan. • Orange - Significant information required at the planning stage. • Green - Standard information required at the planning stage.
Do you consider it necessary to participate in a public hearing	

<p>session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	<p>Appendix 2 FW2024_0840 – LLFA Response – Sites Review (Excel).xlsx</p>
<p>Officer Summary</p>	<p>NCC LLFA advise: A comprehensive review of the remaining sites has been produced is attached to this representation, document title Appendix 2 FW2024_0840. LLFA's response is specific to surface water flood risk. No other sources of flood risk (including but not limited to fluvial and coastal flooding; flooding from artificial sources; groundwater flooding and sewer flooding) have been reviewed as part of this consultation.</p> <p>The following criteria have been used in our review, see appendix 2:</p> <p>Surface Water Flood Risk</p> <ul style="list-style-type: none"> • These have been reviewed for the 3.33%, 1.0% and 0.1% Annual Exceedance Probability (AEP) events for surface water flooding. • Where deemed necessary, site-specific comments have been provided. • Assessment of onsite flood risk is proportionate to the site size and the flood risk significance. <p>Reports of Internal and Anecdotal (inclusive of external) Flooding</p> <ul style="list-style-type: none"> • Reviewed with the LLFAs current flood records (which date back to 2011). • Onsite and flood records within 500m of the site boundary have been reported. • Please note all external flood records are deemed to be anecdotal. <p>Watercourses</p> <ul style="list-style-type: none"> • These have been reviewed and identified when onsite or within 100m proximity to the site boundary. • If a watercourse does not fall within the provided site boundaries (even if it is on the edge of the site boundary) this has been classed as offsite. • Watercourses have been defined (ordinary watercourse, main river etc) • We have not defined the ownership of the watercourses in this assessment. • We have not reviewed offline watercourses, blind ditches or pond features as part of this review. Further investigation will be needed to assess these features, their type and whether they are connected to the wider drainage network. • We have not defined whether the features are obstructed by housing or roads etc. <p>Surface and Foul Water Sewer Systems</p> <ul style="list-style-type: none"> • Reviewed against Anglian Water Services sewer mapping. • Both onsite and offsite surface water sewers with 100m of the site boundary have been reported. • We have not defined whether the features are obstructed by housing or roads etc. <p>Additional Information</p> <ul style="list-style-type: none"> • Source Protection Zones (SPZs) (If applicable) • Internal Drainage Boards (IDBs) (If applicable) <p>We have then reported:</p> <ol style="list-style-type: none"> 1. Would local flood risk/surface water drainage constraints be severe enough to prevent development of the site? 2. Recommendations ranging from standard information required at planning through to requiring review and potential removal if deemed appropriate. <p>Where appropriate, we have provided additional site-specific comments. For ease of use, we have produced a traffic light system based on the recommendations column:</p> <ul style="list-style-type: none"> • Red - Recommend a review of the site and potential removal from the local plan. • Orange - Significant information required at the planning stage. • Green - Standard information required at the planning stage. <p>Summary of findings within attached document, Appendix 2: The site was rated as Amber in the RAG rating system. Further consideration needed to assess potential impacts from surface water flow path within north part of site (adj Cromer Road) which impact upon access.</p>
<p>Officer Response</p>	<p>Comments noted. The site-specific policy includes the requirement for a Surface Water Management Plan to demonstrate that greenfield run off rates from the site are not increased. The policy also includes a requirement for a Foul Drainage Strategy that will provide details of any enhancements and set out how additional foul flows will be accommodated within the foul sewerage network, this will be delivered prior to the occupation of any dwellings. It's noted that the comments reflect the standard information required at a planning application stage and as a standard consultee the LLFA will also be consulted on the detailed submissions as part of any future application on site at the appropriate stage.</p>

Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC568
Response Date	18/12/2024 15:03:00
Full Name	Richard Doleman
Organisation	Principle Infrastructure Development Planner Norfolk County Council (Highways)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	No objection to the proposed allocation policy.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	NCC highways advise: No objection to the proposed allocation policy.
Officer Response	Comment noted.
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC570
Response Date	18/12/2024 15:03:00
Full Name	Paul Harker
Organisation	Place Planning Manager Norfolk County Council (Childrens Services)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	RAG Status = Amber Impact on School Estate/Transport Proximity/Capacity to develop schools: If this site came forward in isolation it would currently put pressure on Cromer Junior School, as the school is over admitting at present. Looking at the pattern of pupil numbers we anticipate a level of reduction, but this does not take into account pressure in KS2 which could mean some families not being able to get a place in their local school. The infant cohort is likely to be able to meet demand based on the capacity the school has. This would be the same for the secondary phase schools. The site is within 2 miles of the local schools so no school transport implications arise. We would look to expand the junior school to allow 3 forms of education and likely require developer contributions as a result. Any contributions required to mitigate this development, if the site comes forward, would be sought in response to the planning application.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	

Officer Summary	NCC Education advise: RAG Status = Amber Impact on School Estate/Transport Proximity/Capacity to develop schools: If this site came forward in isolation it would currently put pressure on Cromer Junior School, as the school is over admitting at present. Looking at the pattern of pupil numbers we anticipate a level of reduction, but this does not take into account pressure in KS2 which could mean some families not being able to get a place in their local school. The infant cohort is likely to be able to meet demand based on the capacity the school has. This would be the same for the secondary phase schools. The site is within 2 miles of the local schools, so no school transport implications arise. We would look to expand the junior school to allow 3 forms of education and likely require developer contributions as a result. Any contributions required to mitigate this development, if the site comes forward, would be sought in response to the planning application.
Officer Response	Comments noted. Development is expected to come forward on this site between 2027/28 and 2028/30. As part of the Local Plan a number of sites are allocated in Cromer and the council have liaised with the education authority throughout. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.
Section	Proposed Change 1 - New Site Allocation: Land at Runton Road / Clifton Park, Cromer (C10/1)
ID	FC582
Response Date	19/12/2024 12:03:00
Full Name	Gemma Clark
Organisation	Higher Officer, Sustainable Development, Norfolk Coast and Marine Team Natural England
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILES Impacts to National landscapes Near to the Norfolk Coast National Landscape. Further advice on landscapes is in Annex 3 Nutrient neutrality Outside of a Nutrient Neutrality catchment BMV Agricultural land Unspecified Recreational disturbance and other issues Contributions to GIRAMS included in the policy Provision of 5.3ha of designated open space. This is a relatively small amount for a site close to coastal designations. Further advice on green infrastructure in Annex 1
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	Natural England - Annex 1.pdf Natural England - Annex 3.pdf

<p>Officer Summary</p>	<p>Natural England advise that: Impacts to National Landscapes Near to the Norfolk Coast National Landscape. Further advice on landscapes is in Annex 3 Nutrient neutrality Outside of a Nutrient Neutrality catchment BMV Agricultural land Unspecified Recreational disturbance and other issues Contributions to GIRAMS included in the policy Provision of 5.3ha of designated open space. This is a relatively small amount for a site close to coastal designations. Further advice on green infrastructure in Annex 1 Annex 1 provides general advice around the provision of accessible green open space standards recommending at least 3ha/ 1000population. Annex 3 provides general extracts from the NPPF in relation to national parks and National Landscapes.</p>
<p>Officer Response</p>	<p>Comments noted. The provision of 5.3 ha of open space is in excess of the Councils open space standards which have already been examined and not part of this consultation. The requirements is also above the minimum standards included in advice note attached. The North Norfolk Open Space Assessment 2 Comments noted. The provision of 5.3 ha of open space is in excess of the Councils open space standards which have already been examined and not part of this consultation. The requirements is also above the minimum standards included in NE's advice note attached. The North Norfolk Open Space Assessment 2019 [Examination reference G11] identified that Cromer has a surplus of 3.10 ha amenity space when compared against the Local Plan standards as set out as part of policy HC2.</p> <p>Any proposal is required to contribute to the strategic mitigation in line with the policy approach as detailed in section 6.5 of the submitted Plan and as agreed with Natural England through the Norfolk Strategic Framework. This approach has already been examined and does not form part of the further consultation material. The approach however does include the requirement for larger scale development of 50 units or more to provide additional provision of onsite enhanced green infrastructure EGI or contributions towards off site strategic green infrastructure. The Council in conjunction with the adjacent authorities continues to work through the Norfolk Strategic Framework and duty to co-operate and have recently endorsed the updated GIRAMs Mitigation Action Plan and governance arrangements.</p> <p>019 [Examination reference G11] identified that Cromer has a surplus of 3.10 ha amenity space when compared against the Local Plan standards as set out as part of policy HC2.</p>

Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)

Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC64
Response Date	22/11/2024 13:29:12
Full Name	Mr Denis Connelly. Denis Connelly. D. & C. & B.Connelly & A Foster
Organisation	Family Family
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILES</p> <p>The whole of these proposed developments are ridiculous without an infrastructure that could support it. We do not have the Doctors, Dentists, Hospitals or schools that could take on the additional volume of residents, as they cannot cope now. We do not have the roads that could handle the additional traffic especially while a development was taking place. This would bring the whole area into gridlock. Please think of local residents and not just putting extra money into the rich land owners pockets. Local people need affordable housing but in the right location that has the infrastructure that can handle it without putting others or their lives at risk through being unable to get medical treatment as and when needed or having to use roads that are not able to cope safely with the extra traffic that would be created. This should be considered along with our original objections.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	This depends on the planners doing what is right.
File (where submitted)	Dear Sir or Madam.docx Local Plan Specific Comments.docx Revised notes for response to local plan.docx
Officer Summary	<p>Object: Insufficient infrastructure Attachment and requirements for affordable housing.</p> <p>Appendix 1 is a letter to the Planning Policy Team dated February 2022 and is in relation to Cromer and the Plan's proposals at that time. Attachment 2 is a review of the Local Plan Reg 19 Submission version. Attachment 3 appears to provide a summary of the main issues raised during the Reg 19 consultation made by multiple objectors and do not directly relate to Proposed Change 2, Land West of Pine Tree Farm, Cromer, and as such have already been considered through the examination.</p>
Officer Response	<p>Comments noted: Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability. Affordable housing requirements are set out in Policy HOU2. The attachments do not directly relate to the extension and the purposes of this consultation. The concerns raised have been addressed through hearing sessions previously undertaken in January-March 2024 and are not relevant to this current consultation.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC95
Response Date	25/11/2024 15:01:00
Full Name	Ms Eleanor Roberts
Organisation	Senior Sustainable Development Officer Water Management Alliance
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Thank you for consulting the Water Management Alliance on the North Norfolk Proposed Submission Version (Regulation 19 Publication) Local Plan. The Parishes included in the Housing Allocation Plan have some lands located within the boundary of the Internal Drainage</p>

District (IDD) of the Broads (2006) Internal Drainage Board (IDB) and Norfolk Rivers Internal Drainage Board (IDB). The Board's Byelaws therefore apply to those lands.

A copy of the Board's Byelaws for The Broads IDB can be accessed on our website (https://www.wlma.org.uk/uploads/BIDB_Byelaws.pdf), along with maps of the IDD (https://www.wlma.org.uk/uploads/84-BIDB_drainindex.pdf). A copy of the Board's Byelaws for Norfolk Rivers IDB can be accessed on our website (https://www.wlma.org.uk/uploads/NRIDB_Byelaws.pdf), along with maps of the IDD (https://www.wlma.org.uk/uploads/179-NRIDB_Index.pdf).

In keeping with other WMA member Boards, the principal function of the Broads (2006) IDB and Norfolk Rivers IDB is to provide flood protection within the Board's area. Certain watercourses within the IDD have been designated as 'Adopted Watercourses' by the Board. The adoption of a watercourse is an acknowledgement by the Board that the watercourse is of arterial importance to the IDD and as such, will normally receive maintenance from the IDD.

For clarity, Main Rivers within each IDB are regulated by the Environment Agency.

The Board's rationale and approach towards managing flood risk and water levels within the IDD is set out in the WMA Group's Planning and Byelaw Strategy document (https://www.wlma.org.uk/uploads/WMA_Planning_and_Byelaw_Policy.pdf).

The Board will comment on planning for all major developments (10 or more properties) within the IDD watershed that are likely to discharge surface water into a watercourse within the IDD. Under certain circumstances, some major developments outside the IDD boundary may also be regulated by the Board's byelaws. We request that the Board is consulted as any planning application comes forward relating to any of the identified allocation sites.

In order to reduce potential conflict between the planning process and the Board's regulatory regime and consenting process please be aware of the points set out below.

Sites within WMA Board IDD

- F10 Fakenham, Land South of Barons Close

This allocation site is partially within the Norfolk Rivers IDD, and I note the presence of a Board Adopted watercourse (DRN093G0101 – MN51 Fakenham) adjacent to the southern site boundary, as well as riparian watercourses to the east and west. For any future proposals at this site, please be aware of the following:

- Surface water disposal from new developments should be in line with the drainage hierarchy (as per best practice).
- If surface water is proposed to be disposed of via infiltration, we would recommend that the proposed strategy is supported by ground investigation to determine the infiltration potential of the site and the depth to groundwater. If on-site material were to be considered favourable then we would advise infiltration testing in line with BREDigest 365 (or equivalent) to be undertaken to determine its efficiency.
- If a surface water discharge is proposed to a watercourse, the proposed development will require land drainage consent in line with the Board's byelaws (specifically byelaw3). Any consent granted will likely be conditional, pending the payment of a Surface Water Development Contribution fee, calculated in line with the Board's charging policy (https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf).
- The discharge of treated foul water to a watercourse within the IDD requires land drainage consent in line with the Board's byelaws (specifically byelaw 3).
- Any works within 9 metres of a Board adopted watercourse will require consent to relax Byelaw 10 (no obstructions within 9 metres of the edge of drainage or flood risk management infrastructure).
- If development proposals involve works to alter a Board Adopted watercourse, consent is required under Section 23 of the Land Drainage Act 1991 (and byelaw 4).
- Should any development proposals include works to alter a riparian watercourse (including culverting for access), consent will be required under Section 23 of the Land Drainage Act 1991 (and byelaw 4). The Board is responsible for consenting this activity within the IDD, while Norfolk County Council (the Lead Local Flood Authority) is the regulatory body outside the boundary of the IDD.

Sites outside WMA Board IDD with potential to negatively impact the IDD

- C22/2, Cromer, Land West of Pine Tree Farm
- F01/B, Fakenham, Land North of Rudham Stile Lane
- F02, Fakenham, Land Adjacent Petrol Filling Station
- F03, Fakenham, Land at Junction of A148 & B1146
- LUD01/A, Ludham, Land South of School Road
- NW01/B, North Walsham, Land at Norwich Road & Nursery Drive
- NW62/A, North Walsham, Land West of North Walsham
- E7, Tattersett, Tattersett Business Park

The above sites lie outside the Norfolk Rivers IDB's IDD, however have the potential to significantly impact the Board's district should a surface water discharge be proposed. We recommend that as each of these sites prepares to apply for planning permission, they ensure their drainage proposals are designed in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4 and with the input of the IDB. It is possible that consent will be required from the Board for surface water discharge from these sites. It is likely that significant improvement works will be required in the receiving catchments of these developments in order to accept resultant additional flows downstream, for the purpose of reducing flood risk upstream and we would welcome discussion as early as possible to come to any necessary agreements to reduce flood risk in both the Board's IDD downstream and new development upstream.

At this stage our advice for surface water drainage design is as follows:

- Surface water disposal from new developments should be in line with the drainage hierarchy (as per best practice).
- We recommend that a drainage strategy is supplied which has been considered in line with the Planning Practice Guidance SuDS discharge location hierarchy.
- If it is proposed that a site disposes of surface water via infiltration, we recommend that the viability of this proposal is evidenced by ground investigation followed by infiltration testing in line with BRE Digest 365.
- If a surface water discharge is proposed to a watercourse within the watershed catchment of the Board's IDD then we request that this be in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible.
- Should any development proposals include works to alter a riparian watercourse (including culverting for access), consent will be required under Section 23 of the Land Drainage Act 1991. The Board is responsible for consenting this activity within the IDD, while Norfolk County Council (the Lead Local Flood Authority) is the regulatory body outside the boundary of the IDD.

Sites outside WMA Board IDD less likely to negatively impact the IDD

- BLA04/A, Blakeney, Land East of Langham Road
- BRI01, Briston, Land East of Astley Primary School
- BRI02, Briston, Land West of Astley Primary School
- C07/2, Cromer, Land at Cromer High Station
- C16, Cromer, Former Golf Practice Ground, Overstrand Road
- H17, Holt, Land North of Valley Lane
- H20, Holt, Land at Heath Farm
- H27/1, Holt, Land at Heath Farm
- HV01/B*, Hoveton, Land East of Tunstead Road
- LUD06/A, Ludham, Land at Eastern End of Grange Road
- NW52, North Walsham, Land East of Bradfield Road
- MUN03/B, Mundesley, Land off Cromer Road & Church Lane
- SH04, Sheringham, Land Adjoining Seaview Crescent
- SH07, Sheringham, Former Allotments, Weybourne Road, Adjacent to 'The Reef'
- SH18/1B, Sheringham, Land South of Butts Lane
- ST19/A*, Stalham, Land Adjacent Ingham Road
- ST23/2*, Stalham, Land North of Yarmouth Road, East of Broadbeach Gardens
- W01/1, Wells-next-the-Sea, Land South of Ashburton Close
- W07/1, Wells-next-the-Sea, Land Adjacent Holkham Road

*We would expect to see successful infiltration in this location as per other recent local developments.

For the above sites, we have no initial concerns, however as stated above we would request that the WMA is consulted on any forthcoming planning applications at these sites. Our standing advice at this stage is as follows:

- Surface water disposal from new developments should be in line with the drainage hierarchy (as per best practice).
- We recommend that a drainage strategy is supplied which has been considered in line with the Planning Practice Guidance SuDS discharge location hierarchy.
- If it is proposed that a site disposes of surface water via infiltration, we recommend that the viability of this proposal is evidenced by ground investigation followed by infiltration testing in line with BRE Digest 365.
- If a surface water discharge is proposed to a watercourse within the watershed catchment of the Board's IDD then we request that this be in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible.

	<ul style="list-style-type: none"> Should any development proposals include works to alter a riparian watercourse (including culverting for access), consent will be required under Section 23 of the Land Drainage Act 1991. The Board is responsible for consenting this activity within the IDD, while Norfolk County Council (the Lead Local Flood Authority) is the regulatory body outside the boundary of the IDD. <p>Whilst the consenting process as set out under the Land Drainage Act 1991 and the aforementioned Byelaws are separate from planning, the ability to implement a planning permission may be dependent on the granting of these consents. As such we strongly recommend that developers seek the necessary consent prior to determination of a planning application. The Board's officers are available to respond to queries and provide advice.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	site C22/4 is included in the table as a 'Sites outside WMA Board IDD with potential to negatively impact the IDD'
Officer Response	Note: This response is an identical repeat of the WMA Reg 19 response with the exception that site C22/4 is included in the table as a 'Sites outside WMA Board IDD with potential to negatively impact the IDD'. Comments noted. No changes to policy required.
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC125
Response Date	03/12/2024 11:05:00
Full Name	Mrs Lisa Rieffel
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILES</p> <p>Is not effective</p> <p>Insufficient infrastructure, already in an area where surface drains regularly flood and do not support local capacity</p> <p>With the extension does not provide accessibility to Roughton Road that has been ruled out with previous developments due to lack of infrastructure.</p> <p>Will have significant impact on privacy and footfall around existing properties backing onto the development on the Roughton Road, this has not been factored in. This area currently has no footfall in or around the properties and would impinge on privacy, light pollution and water and mains drainage.</p> <p>Is poorly configured to wrap around the existing buildings with minimal advantage on the Southern boundary abutting Roughton Road with little benefit in these areas. Impinging the natural corridor for wildlife.</p> <p>There is no current footfall or footpaths in this area and no public right of access - This would therefore change the characteristic of the landscape and neighbouring properties aligning the Roughton Road</p> <p>Is not justified</p> <p>The two small portions of extension abutting the Roughton Road do not justify the benefit and are in conflict with previously rejected proposals to enter the Roughton Road from this land. See attached documents - The original reasons for rejection still remain.</p> <p>Is not consistent with national policy - It impinges the small village policy, utilising land currently designated as Roughton Parish to justify increasing housing to support Cromer's increased need.</p>
Do you consider it necessary to participate in a public hearing	Yes

<p>session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	<p>There is mention of the property at Pine Tree Farm and residential properties. However, there is little reflection or consideration to the impact of the existing properties in a rural area backing onto the development abutting the Roughton Road.</p> <p>These properties have no footfall/public right of ways or light pollution currently and will significantly deteriorate the countryside corridor that exists, privacy and light pollution.</p>
<p>File (where submitted)</p>	<p>C22.docx Plans for a major new development with 185 houses.docx CROMER - PO181551 - Outline application for a mixed use scheme consisting of up to 185 homes an E.pdf</p>
<p>Officer Summary</p>	<p>Object: Insufficient infrastructure, already in an area where surface drains regularly flood and do not support local capacity. With the extension does not provide accessibility to Roughton Road that has been ruled out with previous developments due to lack of infrastructure. Will have significant impact on privacy and footfall around existing properties backing onto the development on the Roughton Road, this has not been factored in. This area currently has no footfall in or around the properties and would impinge on privacy, light pollution and water and mains drainage.</p> <p>Is poorly configured to wrap around the existing buildings with minimal advantage on the Southern boundary abutting Roughton Road with little benefit in these areas. Impinging the natural corridor for wildlife. This is a significant increase in one proposed site increasing the impact on an otherwise quiet, dark skies environment where there is limited light pollution. There is already a significant allocation provided and development should be spread on other allocated sites within the Cromer Parish Boundaries to meet the housing shortfall.</p> <p>The extension compounds the amount of traffic flow to the Cromer Road with no access to Roughton Road and is disjointed in its configuration.</p> <p>This land is infringing on Roughton Parish Land for the use of building to quantify development for Comer Parish to justify numbers. Roughton Parish falls under the small villages allocation and should not be included in this extension as it contravenes the small village allocation for Roughton.</p> <p>The exiting Anglia water supply has major issues in this area of Roughton Road, with regular flooding and over capacity of drainage, this will be severely compounded by the proposed extension.</p> <p>Attachment 2 appears to be in relation to a news article or summary of a news report however, no context is provided. Attachment 3 includes the Officer Report for application PO/18/1551 which relates to a scheme previously proposed on this site but is no longer being taken forwards.</p>
<p>Officer Response</p>	<p>Comments noted. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability. The site-specific policy includes requirements to the implementation of a surface water management plan that ensures there is no adverse effects on European sites and greenfield run-off rates are not increased. This is in addition to other requirements in the policy that require a foul drainage strategy to be undertaken and the provision of enhancements to sewerage infrastructure prior to the first occupation of any dwellings.</p> <p>The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and as a result of discussions relating to this consultation, the Highways Authority confirmed that vehicular access onto Roughton Road from either C22/4 or C19/2 is unsuitable and not supported. The site-specific policy for C22/4 includes requirements to retain and upgrade the existing public footpath to a surfaced route with the additional provision or a new route which connects to Roughton Road. This will provide a more sustainable means of connectivity that encourages active travel between the site and services and facilities located on Roughton Road.</p> <p>The site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan, including Policy CC13 - Protecting Environmental Quality which makes reference to air quality and the requirement for development proposals to minimise and take every opportunity to reduce through proportionate mitigation measures, all emissions, contamination and other forms of pollution.</p> <p>In addition to the above, the site-specific policy includes requirements to provide green infrastructure, retention of hedgerows and trees, provide open space and landscaping that maximises connectivity with the inclusion of biodiversity improvements and enhancements to existing key features such as the Beckett's Plantation.</p>

	<p>Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (C4, Page 25). Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.</p> <p>The information provided in attachment 3 relates to an application for a scheme partly situated on land within C22/4 and C19/2. The application was withdrawn and is not related to this consultation which is seeking comments pertaining to the site's suitability as an allocation, not the details of a previous application.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC163
Response Date	07/12/2024 12:39:35
Full Name	Mr Richard Goldsmith
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Proposals were submitted historically for this same site and rejected for valid reasons. This land site within the parish boundary which is proposed as part of the extension C22/4 is not cromer parish boundary land and should not be being considered as part of the provision of cromer housing plan.</p> <p>There is no consideration given for the impact of the properties abutting the proposed extension which is disjointed and provides no benefit without access for properties on this portion of land out onto the Roughton Road. There is no detail of where footpaths would be proposed. The existing farmland at this end of the field where the extension to the existing plan is proposed has no current footpath or footfall and currently affords natural privacy to these properties. This would be a huge invasion of privacy to my property which would be affected on both sides of my property both back and side. This land is currently identified as an area of outstanding natural beauty and to be preserved as such and is a wildlife corridor for deer and other wildlife.</p> <p>The properties abutting the Roughton Road/proposed extension to development at Pine Tree Farm already suffer huge problems with surface drainage and proposals of the significant nature outlined would hugely compound the Roughton Parish infrastructure.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: Proposals were submitted historically for this same site and rejected for valid reasons. This land site within the parish boundary which is proposed as part of the extension C22/4 is not cromer parish boundary land and should not be being considered as part of the provision of cromer housing plan.</p> <p>There is no consideration given for the impact of the properties abutting the proposed extension which is disjointed and provides no benefit without access for properties on this portion of land out onto the Roughton Road. There is no detail of where footpaths would be proposed. This would be a huge invasion of privacy to my property which would be affected on both sides of my property both back and side. This land is currently identified as an area of outstanding natural beauty and to be preserved as such and is a wildlife corridor for deer and other wildlife.</p> <p>The properties abutting the Roughton Road/proposed extension to development at Pine Tree Farm already suffer huge problems with surface drainage and proposals of the significant nature outlined would hugely compound the Roughton Parish infrastructure.</p>
Officer Response	Comments noted. Whilst located on the edge of Cromer's settlement boundary, the site does lie within the parish boundaries of Roughton and Northrepps. However, the site is most closely

	<p>related to Cromer and services and facilities therein and does not conflict with the operation of the Small Growth Village approach set out in the Local Plan. The operation of Policy SS1 Spatial Strategy does not relate to parish boundaries but relies upon the defined settlement boundaries for the Selected Settlements. The defined settlement boundaries can be found on the Policies Map [Examination ref. A2]. In addition, settlement boundary reviews for all Small Growth Villages are evidenced in Background Paper 11 [Examination ref.C11].</p> <p>The site-specific policy includes requirements for the site to be designed in such a way that it pays careful attention to the site's layout, building heights and materials used. The exact masterplanning for the site will be explored and consulted on through the application process. Furthermore, the site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan, including Policy ENV 8 - High Quality Design.</p> <p>The site-specific policy includes requirements to the implementation of a surface water management plan that ensures there is no adverse effects on European sites and greenfield run-off rates are not increased. This is in addition to other requirements in the policy that require a foul drainage strategy to be undertaken and the provision of enhancements to sewerage infrastructure prior to the first occupation of any dwellings.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC183
Response Date	06/12/2024 09:42:00
Full Name	Julie Chance
Organisation	Felbrigg Parish Council
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>I am writing on behalf of Felbrigg Parish Council with reference to the new updated local plan following on from our submission to the original plan.</p> <p>Members attended to both listen and speak at the local plan Inspector consultation at the North Norfolk District Council office on 14th February 2024 and found it incredible that not only was the inspector completely uninterested in the points put forward to him with reference to concerns about road infrastructure, but that there was almost no mention of infrastructure throughout the day. We have concerns about the doctors, hospital, ambulances, etc, all of which are unable to cope at present. The inspector only seemed interested in building more houses, houses we do not have a need for. We have such a high percentage of holiday/second homes. The proportion of houses to be built for first time buyers and social housing is minimal and nothing was discussed concerning care homes and the dwindling hospitality sector, which brings millions into our area. How will they find staff when we have no young people left to service the vast number of older population retiring here to purchase the new houses being built, all of which put more pressure on the services above.</p> <p>How can a plan be put in place to significantly increase the number of houses and care homes without the infrastructure to facilitate it? The inspector had obviously visited the sites of all the developments yet had no comments or concerns with reference to the roads. Did the Inspector look at the roads surrounding the developments to understand the huge concerns of local residents. The increase in both construction traffic and the large volume of extra cars will impact us all.</p> <p>The B1436, put forward to you in previous submission, is at breaking point. Since the 2022 letter we are still seeing a significant increase in traffic, volume and accidents. We have volumes coming in at 12-15,000 plus per day with such a large portion of this being lorries and agricultural vehicles.</p> <p>When these new developments are being built, which roads are going to be used to service them? The Pine Trees Farm development is going to put a roundabout in place. Where will the traffic be re-directed when the Norwich Road is out of action? How will the construction traffic get to this site and the Overstrand Road development? We believe they will use the B1436 and potentially either Roughton Road or Suffield Park. Old Mill Road and Carr Lane need to have something in place to protect these roads as they are not capable of taking any further traffic safely. Have Highways been re-consulted on the increased number of houses? There were objections from them previously.</p> <p>The impact of the B1436 being closed was shown when the resurfacing took place earlier this year. Cromer was completely gridlocked from both directions with traffic backing up as far back as the Felbrigg roundabout. It is impossible to close the B1436 without major impact on the free flow of traffic through Cromer. There is no safe diversion around the B 1436 all roads off it are single carriageway. The width does not allow for two cars or lorries. This</p>

	<p>means all traffic has to attempt Cromer. The artic lorries cannot get through the very bad design of the entrance to the town Felbrigg village has been made the bypass of Cromer on a very poor B road, with no pavements, no street lights and no safe road crossing for children to access the school bus. They have no shelter to wait for the bus and the speeding is life threatening. Residents attempting to walk the pavements have lorry mirrors passing very close to them. It is dangerous pulling out from houses without the noise and omissions created . We are, as residents, entitled to a quality of life. This has been taken away from us with all the development to date without the excessive extra volume proposed. The B 1436 is not fit for purpose at present without an increase in housing. A bypass needs to be developed.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	FC 183 - 20241206 - Felbrigg Parish Council (Proposed change 1).pdf
Officer Summary	<p>Object: Members attended to both listen and speak at the local plan Inspector consultation at the North Norfolk District Council office on 14th February 2024. We have concerns about the doctors, hospital, ambulances, etc, all of which are unable to cope at present. The inspector only seemed interested in building more houses, houses we do not have a need for. We have such a high percentage of holiday/second homes.</p> <p>The inspector had obviously visited the sites of all the developments yet had no comments or concerns with reference to the roads. The 81436, put forward to you in previous submission, is at breaking point. Since the 2022 letter we are still seeing a significant increase in traffic, volume and accidents.</p> <p>The Pine Trees Farm development is going to put a roundabout in place. Where will the traffic be re-directed when the Norwich Road is out of action? How will the construction traffic get to this site and the Overstrand Road development? We believe they will use the B1436 and potentially either Roughton Road or Suffield Park. The impact of the B1436 being closed was shown when the resurfacing took place earlier this year. Cromer was completely gridlocked from both directions with traffic backing up as far back as the Felbrigg roundabout. It is impossible to close the B1436 without major impact on the free flow of traffic through Cromer. There is no safe diversion around the B 1436 all roads off it are single carriageway.</p> <p>The B 1436 is not fit for purpose at present without an increase in housing. A bypass needs to be developed.</p>
Officer Response	<p>Comments noted. The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning in Health Protocol. The protocol presents a process describing how relevant NHS organisations, Norfolk & Suffolk County Councils, Public Health and the Norfolk and East Suffolk Local Planning Authorities jointly engage to ensure that health considerations are adequately accounted for in plan making and in planning applications and their subsequent developments so that the appropriate authorities can plan and priorities investment(s). Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p> <p>The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy.</p> <p>The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole which has resulted in the requirement within the site-specific policy to provide conduct a Transport Assessment that includes the analysis of the development's impact on the local road network, including during construction periods, and identify any potential mitigation solutions as required. No vehicular access onto Roughton Road is proposed as the Highway's Authority confirm this is unsuitable.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC192

Response Date	09/12/2024 14:12:45
Full Name	Robert Harbord-Hamond
Organisation	
Agent Full Name	Marie Laidler
Agent Organisation	Sworders
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>This is a large extension of the submission document allocation (C22/2); however, a large majority of this area was not initially published as an alternative site for assessment in terms of suitability for development. Therefore, it is questioned whether this is a realistic opportunity to rely on additional housing within this site without having been fully assessed. Furthermore, part of the allocation (C18) was originally assessed as not suitable for development within the First Draft Local Plan (Part 1) Alternatives Considered (Examination Library Document Reference B6), however it was later reported to have a positive site score for residential development within the Sustainability Appraisal Report – January 2022 (Examination Library Document Reference A3) as being on the edge of the settlement and with access to public transport facilities etc.</p> <p>The recently published Addendum to the Sustainability Appraisal Report (Nov 2024) (Examination Document Reference FC006) also does not wholly conclude that the entire site (draft allocation plus extension with new ref. C22/4) is suitable for development as it sets out within Section 5 (Appraisal of Draft Additional Site Proposals and Extensions to existing Site Allocations – Preferred and Alternative Options):</p> <p><i>'The Social and Economic objectives score positively, and the Environmental objectives have a mixed score, given the potential negative impact on the designated landscape, biodiversity and nearby heritage asset'.</i></p> <p>Extending the allocation would extend the settlement limit further south, further from the town centre than many of the alternative sites put forward and would harmfully encroach into the open countryside and the National Landscape. A landscape buffer would not be sufficient to mitigate this impact as suggested in the consultation. Furthermore, as evidenced in the site assessment the allocation will have a negative impact on biodiversity and the nearby heritage asset.</p> <p>The alternative site at Harbord House (C15/1) remains available for development for specialist accommodation that would be in accordance with the spatial strategy set out within the Local Plan. It is suitably located as set out within the site appraisal in which it scored positively in terms of social and economic considerations. C15 should be reconsidered for the additional housing requirements for Cromer.</p> <p>Overall, the proposed change is not considered to contribute to the overall soundness of the Plan.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	If the Inspector does not consider the extension to the Policy to be the right approach, then the opportunity to provide further clarity regarding C15 would be welcomed.
File (where submitted)	Planning Appraisal DOC-20230823-WA0000_.pdf (1)
Officer Summary	<p>Object: This is a large extension of the submission document allocation (C22/2); however, a large majority of this area was not initially published as an alternative site for assessment in terms of suitability for development. Therefore, it is questioned whether this is a realistic opportunity to rely on additional housing within this site without having been fully assessed.</p> <p>Extending the allocation would extend the settlement limit further south, further from the town centre than many of the alternative sites put forward and would harmfully encroach into the open countryside and the National Landscape.</p> <p>The alternative site at Harbord House (C15/1) remains available for development for specialist accommodation that would be in accordance with the spatial strategy set out within the Local Plan. It is suitably located as set out within the site appraisal in which it scored positively in terms of social and economic considerations. C15 should be reconsidered for the additional housing requirements for Cromer.</p> <p>Attachment provides information on alternative site.</p>

Officer Response	<p>Comments noted and alternative proposed site is acknowledged. The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing. The extension has been assessed by the Council as shown in Appendix 1 to the Additional Sites Review Background Paper.</p> <p>The site-specific policy includes mitigation requirements to offset the site's potential impact on the National Landscape. The Council provided a detailed response to the need to provide growth within the National Landscape and this is set out in the Council's Matter 5 Statement (EH011(a)(i)). A detailed site-specific assessment of the site's impact on the National Landscape is available to view in the Additional Sites Review Background Paper Appendix 1, the conclusion of which is that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC236
Response Date	12/12/2024 12:20:00
Full Name	Graham Best
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>Having attended the meeting of the District Council at Cromer Parish Hall yesterday, I would like the opportunity to make these comments, referencing the Land off Norwich Road Northrepps in particular.</p> <p>It seemed obvious to me that the council faces an awkward and embarrassing dilemma. Pressurised on the one hand to deliver an impossible target and on the other to encourage developments in areas that very few people would deem desirable. Certainly the land neighbouring Clifton Park seems a total non starter for all of the reasons outlined at the meeting, and also the vast development west of Norwich Road in the form outlined would also be unacceptable.</p> <p>It seems to me that the previous application to develop that land as well as another parcel west of Roughton Road which was rightly rejected, has been rekindled under the guise that Roughton Road will no longer be an access point thereby getting round Highways rejections; but nevertheless many problems remain. As outlined in my attachment.</p> <p>At yesterday's meeting, there did seem a genuine desire for truly affordable and social housing. This is essential. Before the 80's councils owned vast numbers of homes. Having been brought up in one in Norwich, they were always well maintained and the rent reasonable; providing a good standard of accommodation. I did think part of the Labour Party manifesto was to enable councils to build more homes for rent. Surely this would be a better use of any available land rather than build a vast quantity of expensive housing to encourage retirees moving in to an area already overwhelmed by such a demographic. Fewer houses, but built with a purpose and arguably improving the health and social welfare of the many on the council waiting lists as well as those wanting to move out of expensive inadequate privately rented accommodation. Surely this is what planning for the future should be about.</p> <p>Perhaps, as was hinted at the meeting, time will pass and common sense prevail.</p> <p>I hope this will be a useful addition.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	planning objection 18 1551_Redacted.pdf

Officer Summary	<p>Object: It seems to me that the previous application to develop that land as well as another parcel west of Roughton Road which was rightly rejected, has been rekindled under the guise that Roughton Road will no longer be an access point thereby getting round Highways rejections; but nevertheless many problems remain. As outlined in my attachment. I did think part of the Labour Party manifesto was to enable councils to build more homes for rent. Surely this would be a better use of any available land rather than build a vast quantity of expensive housing to encourage retirees moving in to an area already overwhelmed by such a demographic.</p> <p>Attachment includes comments provided in relation to the previous application PO/18/1551.</p>
Officer Response	<p>Comments noted. The previous application for a scheme partly situated on land within C22/4 and C19/2 was withdrawn and is not related to this consultation which is seeking comments pertaining to the site's suitability as an allocation, not the details of a previous application. The comments included within the attachment are based on specific plans associated with the previous application and cannot be applied to this consultation.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC238
Response Date	11/12/2024 17:13:00
Full Name	Mrs Debbie Mack
Organisation	Historic Environment Planning Adviser Historic England
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>UNSOUND</p> <p>Whilst there are no designated heritage assets on site, this site surrounds 3 sides of the grade II listed Pine Tree Farmhouse. Part of the house probably dates from the 17th century, with the roof having been raised and additions made in the late C18. The house is of painted flint and brick with a Belgian tile roof. Broadly rectangular in plan, the farmhouse has extensions to rear under catslide roofs.</p> <p>Any development of the site therefore has the potential to impact the setting of the grade II listed building</p> <p>The enlarged site will serve to intensify the urbanising effect on the setting of the farmhouse.</p> <p>In our SOCG (https://www.north-norfolk.gov.uk/media/9761/ex023-statement-of-common-ground-nndc-historic-england.pdf), we continued to state our concerns in relation to this site.</p> <p>Further to that, our Matter 5 hearing statement (https://www.north-norfolk.gov.uk/media/9861/eh011-1-historic-england-response-to-miqs-matter-5.pdf) set out our ongoing concerns in detail.</p> <p>Historic England welcomed the preparation of the revised Heritage Impact Assessment (HIA) (https://www.north-norfolk.gov.uk/media/8921/c10-paper-10-historic-impact-assessment-updated.pdf) for the site in 2023. The HIA considers the potential impacts of the development on heritage assets and makes a number of helpful policy recommendations.</p> <p>We understand that the HIA has been updated to reflect the newly enlarged site in 2024 (Additional Sites Review Background Paper p36-41) (https://www.north-norfolk.gov.uk/media/10669/fc002-additional-sites-review.pdf) which is welcomed.</p> <p>The recommendations from the 2023 HIA still apply and are repeated in the 2024 version.</p> <p>As set out in our hearing statement, in reviewing the 2023 HIA, Historic England has identified three mitigation recommendations from the HIA that are missing from the policy criteria. These are:</p> <ul style="list-style-type: none"> • Landscaped buffer along the western boundary of the site • Dwellings of one or one and a half storey height on the southernmost part of the site. • Enhance existing tree belt and landscaping close to Pine Tree Farm and adjacent to Norwich Road (A149). <p>It is our view that the impacts, effects and consequent recommendations in the HIA have not been fully taken into account in the policy formulation. To that end, the site-specific requirements for the development of the site would not be effective and would not be consistent with national policy to secure the conservation and enhancement of the historic environment.</p> <p>We therefore recommend that the policy criteria are amended as:</p>

	<p>4. Careful attention to site layout, building heights and materials in order to minimise the visual impact of the development on the Norfolk Coast Area of Outstanding Natural Beauty. <u>Building heights should be restricted to one or 1.5 storey height on southern part of site;</u></p> <p>8. Retention and enhancement of hedgerows and trees around and within the site, including the protection of existing woodland within site <u>and the provision of a landscaped buffer along the southern and western boundaries;</u></p> <p>15. Development should preserve and enhance the setting of the grade II listed Pine Tree Farmhouse through careful layout, design and landscaping <u>including enhancement of tree belt and landscaping close to the Farmhouse.</u></p> <p>As currently drafted, the allocation is not consistent with national policy due to impacts on the historic environment and the policy wording is not effective in conserving and enhancing the historic environment. The allocation is therefore, in our view, unsound.</p> <p>The inclusion of this change suggested above would help to ensure that site-specific requirements for development of the site are justified by the findings of the HIA, consistent with national policy and effective in conserving and enhancing the historic environment.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	<p>241218 HE response letter NNLP Further Consult.pdf</p>
<p>Officer Summary</p>	<p>Whilst there are no designated heritage assets on site, this site surrounds 3 sides of the grade II listed Pine Tree Farmhouse. Part of the house probably dates from the 17th century, with the roof having been raised and additions made in the late C18. The house is of painted flint and brick with a Belgian tile roof. Broadly rectangular in plan, the farmhouse has extensions to rear under catslide roofs.</p> <p>Any development of the site therefore has the potential to impact the setting of the grade II listed building. The enlarged site will serve to intensify the urbanising effect on the setting of the farmhouse.</p> <p>In our SOCG (https://www.north-norfolk.gov.uk/media/9761/ex023-statement-of-common-ground-rndc-historic-england.pdf), we continued to state our concerns in relation to this site. Further to that, our Matter 5 hearing statement (https://www.north-norfolk.gov.uk/media/9861/eh011-historic-england-response-to-miqs-matter-5.pdf) set out our ongoing concerns in detail.</p> <p>Historic England welcomed the preparation of the revised Heritage Impact Assessment (HIA) (https://www.north-norfolk.gov.uk/media/8921/c10-paper-10-historic-impact-assessment-updated.pdf) for the site in 2023. The HIA considers the potential impacts of the development on heritage assets and makes a number of helpful policy recommendations.</p> <p>We understand that the HIA has been updated to reflect the newly enlarged site in 2024 (Additional Sites Review Background Paper p36-41) (https://www.north-norfolk.gov.uk/media/10669/fc002-additional-sites-review.pdf) which is welcomed.</p> <p>As set out in our hearing statement, in reviewing the 2023 HIA, Historic England has identified three mitigation recommendations from the HIA that are missing from the policy criteria. These are:</p> <ul style="list-style-type: none"> • Landscaped buffer along the western boundary of the site • Dwellings of one or one and a half storey height on the southernmost part of the site. • Enhance existing tree belt and landscaping close to Pine Tree Farm and adjacent to Norwich Road (A149). <p>It is our view that the impacts, effects and consequent recommendations in the HIA have not been fully taken into account in the policy formulation.</p> <p>We therefore recommend that the policy criteria are amended as:</p> <p>4. Careful attention to site layout, building heights and materials in order to minimise the visual impact of the development on the Norfolk Coast Area of Outstanding Natural Beauty. <u>Building heights should be restricted to one or 1.5 storey height on southern part of site;</u></p> <p><u>8. Retention and enhancement of hedgerows and trees around and within the site, including the protection of existing woodland within site and the provision of a landscaped buffer along the southern and western boundaries;</u></p>

	<p>15. <u>Development should preserve and enhance the setting of the grade II listed Pine Tree Farmhouse through careful layout, design and landscaping including enhancement of tree belt and landscaping close to the Farmhouse.</u></p> <p>As currently drafted, the allocation is not consistent with national policy due to impacts on the historic environment and the policy wording is not effective in conserving and enhancing the historic environment. The allocation is therefore, in our view, unsound.</p>
Officer Response	<p>Comments noted. As expressed within the representation, the Council has engaged with Historic England throughout the process of the Local Plan and produced a SoCG. The principle of the site, C22/2 was explored during the previous hearing sessions undertaken in January-March 2024 and the Inspector response to the Local Plan (July 2024 EH006(f)) raised no significant concerns relating to this site. This consultation is in relation to the proposed extension.</p> <p>Agree in part, to consider modification and amend as necessary. See modification schedule. Text relating to criterion 4 does not relate to the site-specific policy. The policy is considered sufficient for this issue to be considered in relation to the over all scheme in conjunction with landscape buffering at the time of application. This matter has previously been considered in the S0CG EX023. From an Heritage environment perspective the buffer is considered to not be required on the west. The site-specific policy does consider the impacts identified in the HIA and does include requirements relating to the provision of landscaping, open space and retention of hedgerows and trees, in addition to the retention and enhancement of existing woodland within the site. These requirements provide a cumulative provision of mitigation against nearby heritage assets however, the exact masterplanning of the site will be explored and consulted on through the application process.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC268
Response Date	19/12/2024 10:29:13
Full Name	Mr Christopher Yardley
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	The current assessment and policy for this site does not adequately address landscape impacts in relation to the wider damaging effects of the proposed development. The landscape to the south and west of the site is clearly visible from wider areas of the North Norfolk National Landscape. The site itself is within the NNNL. The highest level of design is required for housing and layout - avoidance of the 'generic' designs and poor quality cramped layouts typically seen - and a large landscape buffer of woodland should be planted to the western and southern sides (on adjacent land) in order to screen and ameliorate the significant adverse impact on this nationally important landscape. this is not currently included but needs to be at least 50m in depth to perform any meaningful function.
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: The current assessment and policy for this site does not adequately address landscape impacts. The landscape to the south and west of the site is clearly visible from wider areas of the North Norfolk National Landscape. The site itself is within the NNNL. A large landscape buffer of woodland should be planted to the western and southern sides (on adjacent land) in order to screen and ameliorate the significant adverse impact on this nationally important landscape. this is not currently included but needs to be at least 50m in depth to perform any meaningful function.
Officer Response	Comments noted. The site-specific policy includes mitigation requirements to offset the site's potential impact on the National Landscape. The Council provided a detailed response to the need to provide growth within the National Landscape and this is set out in the Council's Matter 5 Statement (EH011(a)(i)). A detailed site-specific assessment of the site's impact on

	<p>the National Landscape is available to view in the Additional Sites Review Background Paper Appendix 1, the conclusion of which is that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape. The site-specific policy includes requirements to provide landscape buffering along the southern boundary and for the site to be designed in such a way that takes into account the layout and building heights within the context of the National Landscape and existing built form.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC276
Response Date	15/12/2024 13:48:00
Full Name	Ian McCann
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I would like to object to the proposal to alter the Local plan - 2.2 Cromer: Land West of Pine Tree Farm (C22/4) Extended Site Allocation, the following grounds.</p> <p>The proposed site takes the development onto Roughton Road, which is already assessed by Norfolk County Highway as being unsuitable to take additional traffic. There are no footpaths or street lights on Roughton Road until you enter Cromer.</p> <p>The scale of the development means it will be out of keeping with this area. It is in the village of Roughton and breaches the development limit. There is sufficient land to develop within the Cromer town boundary, that is closer to accessible transport, shops and other amenities that could be developed, with potential access to an A road.</p> <p>The loss of flora and fauna on the proposed site that sits within the Norfolk Coast Protected Landscape is a concern and I feel grounds for further appeal and potential judicial review.</p> <p>I am also concerned the consultation itself has not been administered correctly as it does not comply with the Web Content Accessibility Guidelines: WCAG 2 that came in force in October this year.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: The proposed site takes the development onto Roughton Road, which is already assessed by Norfolk County Highway as being unsuitable to take additional traffic. There are no footpaths or street lights on Roughton Road until you enter Cromer.</p> <p>The scale of the development means it will be out of keeping with this area. It is in the village of Roughton and breaches the development limit. There is sufficient land to develop within the Cromer town boundary. Proposed site that sits within the Norfolk Coast Protected Landscape is a concern and I feel grounds for further appeal and potential judicial review.</p> <p>I am also concerned the consultation itself has not been administered correctly as it does not comply with the Web Content Accessibility Guidelines: WCAG 2 that came in force in October this year.</p>
Officer Response	<p>The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and as a result of discussions relating to this consultation, the Highways Authority confirmed that vehicular access onto Roughton Road from either C22/4 or C19/2 is unsuitable and not supported. The site-specific policy for C22/4 includes requirements to retain and upgrade the existing public footpath to a surfaced route with the additional provision or a new route which connects to Roughton Road. This will provide a more sustainable means of connectivity that encourages active travel between the site and services and facilities located on Roughton Road.</p>

Whilst located on the edge of Cromer's settlement boundary, the site does lie within the parish boundaries of Roughton and Northrepps. However, the site is most closely related to Cromer and services and facilities therein and does not conflict with the operation of the Small Growth Village approach set out in the Local Plan. The operation of Policy SS1 Spatial Strategy does not relate to parish boundaries but relies upon the defined settlement boundaries for the Selected Settlements. The defined settlement boundaries can be found on the Policies Map [Examination ref. A2]. In addition, settlement boundary reviews for all Small Growth Villages are evidenced in Background Paper 11 [Examination ref.C11]. The Council has a Brownfield Register, there are not enough sites on this register to accommodate the required growth needed as set out in Policy SS1 and many potential brownfield sites are unsuitable due to location or other constraints.

The site-specific policy includes mitigation requirements to offset the site's potential impact on the National Landscape. The Council provided a detailed response to the need to provide growth within the National Landscape and this is set out in the Council's Matter 5 Statement (EH011(a)(i)). A detailed site-specific assessment of the site's impact on the National Landscape is available to view in the Additional Sites Review Background Paper Appendix 1, the conclusion of which is that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape.

The Council is satisfied that the consultation was conducted fairly and proportionately, and that appropriate publicity was undertaken in line with our normal practices. A significant level of response has been received, indicating a good level of awareness and it is clear that a broad range of concerns (or supporting comments) have been communicated. The consultation has followed the same process for each stage of Local Plan production, and is in-line with the statutory requirements. The Council uses software developed by a reputable and experienced global organisation and is used by hundreds of organisations across the UK including a multitude of local planning authorities to whom this platform was specifically developed.

Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC278
Response Date	15/12/2024 15:56:00
Full Name	Lynda & Peter Moore
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	We would like to place on record our objection to the above plan which would impact on Roughton Road NR27. Highways department had already ruled out development adjacent to this road on the Corylus plan 18/1551 due to increased traffic on a narrow road. The Norwich Road would be more accessible and impact far less, even though it is still part of an area of outstanding natural beauty and would be a great threat to the environment. Building houses on greenfield sites does not necessarily help those looking for a home and, in fact, are often used as second homes. In our opinion, smaller developments next to existing amenities should be the way forward.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: Highways department had already ruled out development adjacent to this road on the Corylus plan 18/1551 due to increased traffic on a narrow road. The Norwich Road would be more accessible and impact far less, even though it is still part of an area of outstanding natural beauty and would be a great threat to the environment. Building houses on greenfield sites does not necessarily help those looking for a home and, in fact, are often used as second

	homes. In our opinion, smaller developments next to existing amenities should be the way forward.
Officer Response	<p>Comments noted. The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and as a result of discussions relating to this consultation, the Highways Authority confirmed that vehicular access onto Roughton Road from either C22/4 or C19/2 is unsuitable and not supported. The site-specific policy for C22/4 includes requirements to retain and upgrade the existing public footpath to a surfaced route with the additional provision of a new route which connects to Roughton Road. This will provide a more sustainable means of connectivity that encourages active travel between the site and services and facilities located on Roughton Road.</p> <p>PO/18/1551 related to application for a scheme partly situated on land within C22/4 and C19/2. The application was withdrawn and is not related to this consultation which is seeking comments pertaining to the site's suitability as an allocation, not the details of a previous application.</p> <p>The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC283
Response Date	15/12/2024 17:29:00
Full Name	Mrs Susan Mooring
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am writing to express my strong opposition to the proposed housing development in our neighbourhood. While I understand the need for affordable housing, I believe that this project would have a detrimental impact on our area. First and foremost the development is simply too large for our area. The increase in population density would put a strain on our already overburdened infrastructure, noise pollution and strain on our public services. Additionally the construction of this development project would result in significant environmental damage destroying natural habitats and putting wildlife at risk.</p> <p>The Norfolk County Highways have already said that Mill Lane, Roughton Road and Carr lane are not suitable for increased traffic.</p> <p>In conclusion I strongly urge you to reconsider this proposed housing development.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: I believe that this project would have a detrimental impact on our area. First and foremost the development is simply too large for our area. The increase in population density would put a strain on our already overburdened infrastructure, noise pollution and strain on our public services. Additionally the construction of this development project would result in significant environmental damage destroying natural habitats and putting wildlife at risk.</p> <p>The Norfolk County Highways have already said that Mill Lane, Roughton Road and Carr lane are not suitable for increased traffic.</p>
Officer Response	<p>Comments noted. The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy.</p>

	<p>Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p> <p>The site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan, including Policy CC13 - Protecting Environmental Quality which makes reference to air quality and the requirement for development proposals to minimise and take every opportunity to reduce through proportionate mitigation measures, all emissions, contamination and other forms of pollution.</p> <p>The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and as a result of discussions relating to this consultation, the Highways Authority confirmed that vehicular access onto Roughton Road from either C22/4 or C19/2 is unsuitable and not supported. The site-specific policy for C22/4 includes requirements to retain and upgrade the existing public footpath to a surfaced route with the additional provision or a new route which connects to Roughton Road. This will provide a more sustainable means of connectivity that encourages active travel between the site and services and facilities located on Roughton Road.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC284
Response Date	15/12/2024 16:42:00
Full Name	T Morris
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Highways have already said in 2019 that Mill Road, Roughton Road & Carr lane are NOT suitable for increased traffic.</p> <p>Nothing has changed in the area, please come along and see what they mean.</p> <p>Mill lane is downright dangerous on the corner if a bus or lorry or car for that matter is coming the opposite way or either way come to that. Felbrigg Road is on a blind bend coming from Roughton & Carr lane is just a single road with passing places that is just unacceptable for any heavy traffic.</p> <p>Carr lane has a blind spot leading onto Mill Road too.</p> <p>Roughton Road is not suitable for heavy traffic too as is seen during rush hour or heavy usage by holiday traffic.</p> <p>The AONB would be completely destroyed by any development taking place & the ECO system just would not survive it. So what is the point of having an AONB in place if its just going to be pushed aside and ignored.</p> <p>The human impact would have a serious effect too with the ecological system in decline.</p> <p>The roads would become seriously clogged as its like it now during any bank Holiday or School holidays with grid lock in place in Cromer & Sheringham. It would be nice to have the extra income in these places but at what cost?</p> <p>I am totally against this planned destruction of the wildlife and land in general just to satisfy housing needs over wildlife and our beloved AONB. It also goes without saying that the impact on the local area regarding Schools, Hospitals, Doctors and Dentists would be seriously affected.</p> <p>We need to keep our area as it is and just not destroy it to so it satisfies the statistics.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: Highways have already said in 2019 that Mill Road, Roughton Road & Carr lane are NOT suitable for increased traffic. Mill lane is downright dangerous on the corner if a bus or lorry or car for that matter is coming the opposite way or either way come to that. Felbrigg Road is on a blind bend coming from Roughton & Carr lane is just a single road with passing

	<p>places that is just unacceptable for any heavy traffic. Roughton Road is not suitable for heavy traffic too as is seen during rush hour or heavy usage by holiday traffic.</p> <p>The AONB would be completely destroyed by any development taking place & the ECO system just would not survive it. So what is the point of having an AONB in place if its just going to be pushed aside and ignored. The human impact would have a serious effect too with the ecological system in decline.</p> <p>I am totally against this planned destruction of the wildlife and land in general just to satisfy housing needs over wildlife and our beloved AONB. It also goes without saying that the impact on the local area regarding Schools, Hospitals, Doctors and Dentists would be seriously affected.</p>
Officer Response	<p>Comments noted. The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and as a result of discussions relating to this consultation, the Highways Authority confirmed that vehicular access onto Roughton Road from either C22/4 or C19/2 is unsuitable and not supported. The site-specific policy for C22/4 includes requirements to retain and upgrade the existing public footpath to a surfaced route with the additional provision of a new route which connects to Roughton Road. This will provide a more sustainable means of connectivity that encourages active travel between the site and services and facilities located on Roughton Road.</p> <p>The site-specific policy includes mitigation requirements to offset the site's potential impact on the National Landscape. The Council provided a detailed response to the need to provide growth within the National Landscape and this is set out in the Council's Matter 5 Statement (EH011(a)(i)). A detailed site-specific assessment of the site's impact on the National Landscape is available to view in the Additional Sites Review Background Paper Appendix 1, the conclusion of which is that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC288
Response Date	16/12/2024 01:21:00
Full Name	Mr & Mrs C & S Bayer & Hammans
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>My wife and I wish to object most strongly to the above proposed extension to a development that should never have been passed in the first place.</p> <ul style="list-style-type: none"> • This is an area of outstanding natural beauty (AONB) and any large-scale housing development is to be abhorred due to the destruction of wildlife habitat. • The destruction of valuable agricultural land for housing estates further diminishes available food resources in a vastly overpopulated country that has to import the greater part of its food. • Roughton Road is an unlit, poorly drained country lane without lighting or pavements beyond Compit Hills and is potentially dangerous at present with speeding drivers (especially in the wet) who have zero consideration for others. Particularly between the hours of 0830-0930, 1530-1630 and at night. • The access points shown at A and B on the map are located at the narrowest point on Roughton Road and increased traffic here would create havoc at peak times both for residents and entry/egress to and from Felbrigg Road and Carr Lane. It is hoped Norfolk Highways will object too. • Any housing development here would result in a loss of our distinctive identity and have a negative impact on the overall quality of life for residents. It would also set a precedence for further development and ruination of the entire surroundings. <p>It is to be hoped that good sense will prevail to prevent despoilation and blighting of a beautiful rural area. Please keep us informed of the Council's decision.</p>
Do you consider it necessary to participate in a public hearing	

session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: This is an area of outstanding natural beauty (AONB) and any large-scale housing development is to be abhorred due to the destruction of wildlife habitat. The destruction of valuable agricultural land for housing estates further diminishes available food resources in a vastly overpopulated country that has to import the greater part of its food.</p> <p>Roughton Road is an unlit, poorly drained country lane without lighting or pavements beyond Compit Hills and is potentially dangerous at present with speeding drivers (especially in the wet) who have zero consideration for others. Particularly between the hours of 0830-0930, 1530-1630 and at night. The access points shown at A and B on the map are located at the narrowest point on Roughton Road and increased traffic here would create havoc at peak times both for residents and entry/egress to and from Felbrigg Road and Carr Lane. It is hoped Norfolk Highways will object too.</p> <p>Any housing development here would result in a loss of our distinctive identity and have a negative impact on the overall quality of life for residents. It would also set a precedence for further development and ruination of the entire surroundings.</p>
Officer Response	<p>Comments noted. The site-specific policy includes mitigation requirements to offset the site's potential impact on the National Landscape. The Council provided a detailed response to the need to provide growth within the National Landscape and this is set out in the Council's Matter 5 Statement (EH011(a)(i)). A detailed site-specific assessment of the site's impact on the National Landscape is available to view in the Additional Sites Review Background Paper Appendix 1, the conclusion of which is that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape.</p> <p>The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and as a result of discussions relating to this consultation, the Highways Authority confirmed that vehicular access onto Roughton Road from either C22/4 or C19/2 is unsuitable and not supported.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC293
Response Date	16/12/2024 11:20:00
Full Name	Tracy & Andy Taylor
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Whilst fully accepting the need for more local housing, there surely has to be a balance. Central Government might be able to impose targets but 10% as a total for low cost/rental properties does not go anywhere near far enough to meet local needs</p> <p>Cromer does not need more 4/5 bedroom executive housing ! Often just used as second homes ! It needs affordable housing to keep local people in the area, those born & bred here</p> <p>It also needs alot more 2/3 bedroom bungalows for the growing ageing population. If these bungalows were available, the elderly could sell their houses to buy these bungalows. Hopefully they would have enough money left over to put in their Bank, which in turn would help the local economy & free up more houses for the local people</p> <p>By balance we mean taking local environmental issues & local residents into account. For example, infrastructure already struggles with health facilities. There are localised water table issues that will need addressing before building can commence. Who is going to pay for this ? Increased volume of traffic, especially in the holiday season will put further strain on the road system, Downside could be Cromer gets a bad reputation and the holidaymakers stay away, causing serious problems for our local economy that 'needs' that trade. That would make all this developing a total waste of time & money. They are mainly financial considerations & therefore the ones not likely to affect any decisions. However, there are</p>

	<p>other environmental considerations to take into account for example indigenous wildlife such as deer, bats, owls etc</p> <p>Another important point is that of boundaries. The Government's housing target is for 'CROMER'. The Roughton Road development as shown on the planning maps is approximately 50% of it being in Roughton. Why is this important you might ask ? Roughton is a designated Service Village for Cromer & therefore has a legal unit of 30 dwellings in any single development & not the hundreds as proposed. Even if the planners found a 'loophole' round this, there is also the Small Village development scheme geared to monitor any building in these areas</p> <p>One last thing, floodlights for the proposed football centre is going to break all Roughton Parish wishes to remain a no street light area</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Cromer does not need more 4/5 bedroom executive housing ! Often just used as second homes ! It needs affordable housing to keep local people in the area, those born & bred here. By balance we mean taking local environmental issues & local residents into account. For example, infrastructure already struggles with health facilities. There are localised water table issues that will need addressing before building can commence. Increased volume of traffic, especially in the holiday season will put further strain on the road system, Downside could be Cromer gets a bad reputation and the holidaymakers stay away, causing serious problems for our local economy that 'needs' that trade. That would make all this developing a total waste of time & money.</p> <p>Another important point is that of boundaries. The Government's housing target is for 'CROMER'. The Roughton Road development as shown on the planning maps is approximately 50% of it being in Roughton. Why is this important you might ask ? Roughton is a designated Service Village for Cromer & therefore has a legal unit of 30 dwellings in any single development & not the hundreds as proposed.</p>
Officer Response	<p>Comments noted. The site will be expected to deliver affordable housing in line with the Policy HOU2. The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy.</p> <p>The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole which has resulted in the requirement within the site-specific policy to provide conduct a Transport Assessment that includes the analysis of the development's impact on the local road network, including during construction periods, and identify any potential mitigation solutions as required.</p> <p>Whilst located on the edge of Cromer's settlement boundary, the site does lie within the parish boundaries of Roughton and Northrepps. However, the site is most closely related to Cromer and services and facilities therein and does not conflict with the operation of the Small Growth Village approach set out in the Local Plan. The operation of Policy SS1 Spatial Strategy does not relate to parish boundaries but relies upon the defined settlement boundaries for the Selected Settlements. The defined settlement boundaries can be found on the Policies Map [Examination ref. A2]. In addition, settlement boundary reviews for all Small Growth Villages are evidenced in Background Paper 11 [Examination ref.C11].</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC294
Response Date	16/12/2024 11:37:00
Full Name	Stuart Nash
Organisation	
Agent Full Name	
Agent Organisation	

<p>Does the Proposed Change contribute to the overall soundness of the Plan?</p>	<p>From a long term resident on Roughton Road - the most seriously affected positions as a result of this development.</p> <p>I am writing to record my complete opposition to this boomerang planning permission that continues to be sought for land directly behind my property.</p> <p>In recording my opposition, you should also take note of my previous opposition comments to the numerous other applications that have been presented and defeated along with new information contained within this email.</p> <p>This area falls within the Roughton parish and directly contravenes development of this size outside of the envelope and will effectively lose the definition between Cromer and Roughton.</p> <p>There is a massive water pressure problem in this area already and the infrastructure is not capable of taking additional use and definitely not fit for upgrade with aged pipes already causing leaks on regular occasion.</p> <p>The traffic in this area is horrendous and used as a rat run for people trying to avoid the constant traffic in the centre - buses already struggle to navigate Roughton Road and since the roundabout was put in on the Felbrig Road / A148 junction, local people in this area can regularly wait 5-10 minutes to even join the extremely fast oncoming traffic.</p> <p>The commentary in the application is only addressing the impacts and corrections from Norwich Rd saying that the impact would be shielded etc etc - it absolutely will not be shielded from Roughton Road, there are acres and acres of views and areas of outstanding natural beauty where nature and animals thrive together - where are the answers as to where all the beautiful creatures that currently live safely in these fields are pushed onto - the nearest dangerous main road ?</p> <p>I have lived here for over a decade and it was always told that there wouldn't ever be planning permission granted for building on this land for residential housing and yet here we are, 3 applications later and you are trying to find ways to push this discreetly through.</p> <p>As you can see the proposed amendment takes the development site up to Roughton Road in 2 places marked A and B on the map. This could clearly lead to the development of a cut through road network. Norfolk County Highways have already said that Mill Lane, Roughton Road and Carr Lane are not suitable for increased traffic.</p> <p>If this proposal is accepted then this allows for more land to be developed off Roughton Road in the future, with all the issues that it raises.</p> <p>Clearly this proposed extension would impact the Norfolk Coast Protected Landscape as a designated Area of Outstanding Natural Beauty (AON B) renowned for its diverse wildlife and habitats. The proposed development poses a significant threat to this precious ecosystem. The loss of natural habitats, such as field margins would have a detrimental impact on the area's biodiversity, including endangered species like the Norfolk plover and the marsh harrier.</p> <p>Additionally, increased human activity and disturbance would disrupt delicate ecological balances and potentially lead to the decline of vital plant and animal populations. It is imperative that the importance of preserving this unique landscape is prioritised over short-term development gains.</p> <p>The proposed development would significantly alter the existing character of the settlement. The introduction of large-scale housing estate would disrupt the visual and spatial coherence of the area, leading to a loss of its distinctive identity of this part of Roughton. The development's scale and design would be incompatible with the surrounding historic buildings and traditional street patterns. This would result in a diminished sense of place and a negative impact on the overall quality of life for residents.</p> <p>There is paperwork quoting an independent planning inspector - who is paying this planning inspector please ? This requires an answer. It cannot be classed as independent if they are being paid by anyone with an interest in the outcome of the decision so I await your clarity on this.</p> <p>Acknowledge receipt of this opposition and ensure full transparency going forward to ensure the legally correct outcome.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	

<p>Officer Summary</p>	<p>Object: In recording my opposition, you should also take note of my previous opposition comments to the numerous other applications that have been presented and defeated along with new information contained within this email.</p> <p>This area falls within the Roughton parish and directly contravenes development of this size outside of the envelope and will effectively lose the definition between Cromer and Roughton.</p> <p>There is a massive water pressure problem in this area already and the infrastructure is not capable of taking additional use and definitely not fit for upgrade with aged pipes already causing leaks on regular occasion.</p> <p>The traffic in this area is horrendous and used as a rat run for people trying to avoid the constant traffic in the centre - buses already struggle to navigate Roughton Road and since the roundabout was put in on the Felbrig Road / A148 junction, local people in this area can regularly wait 5-10 minutes to even join the extremely fast oncoming traffic.</p> <p>The commentary in the application is only addressing the impacts and corrections from Norwich Rd saying that the impact would be shielded etc etc - it absolutely will not be shielded from Roughton Road, there are acres and acres of views and areas of outstanding natural beauty where nature and animals thrive together - where are the answers as to where all the beautiful creatures that currently live safely in these fields are pushed onto - the nearest dangerous main road ?</p> <p>Clearly this proposed extension would impact the Norfolk Coast Protected Landscape as a designated Area of Outstanding Natural Beauty (AON B) renowned for its diverse wildlife and habitats. The proposed development poses a significant threat to this precious ecosystem. The loss of natural habitats, such as field margins would have a detrimental impact on the area's biodiversity, including endangered species like the Norfolk plover and the marsh harrier.</p>
<p>Officer Response</p>	<p>Comments noted. Whilst located on the edge of Cromer's settlement boundary, the site does lie within the parish boundaries of Roughton and Northrepps. However, the site is most closely related to Cromer and services and facilities therein and does not conflict with the operation of the Small Growth Village approach set out in the Local Plan. The operation of Policy SS1 Spatial Strategy does not relate to parish boundaries but relies upon the defined settlement boundaries for the Selected Settlements. The defined settlement boundaries can be found on the Policies Map [Examination ref. A2]. In addition, settlement boundary reviews for all Small Growth Villages are evidenced in Background Paper 11 [Examination ref.C11].</p> <p>The site-specific policy includes requirements to the implementation of a surface water management plan that ensures there is no adverse effects on European sites and greenfield run-off rates are not increased. This is in addition to other requirements in the policy that require a foul drainage strategy to be undertaken and the provision of enhancements to sewerage infrastructure prior to the first occupation of any dwellings.</p> <p>The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and as a result of discussions relating to this consultation, the Highways Authority confirmed that vehicular access onto Roughton Road from either C22/4 or C19/2 is unsuitable and not supported. Additionally, the site-specific policy is required to conduct a Transport Assessment that includes the analysis of the development's impact on the local road network, including during construction periods, and identify any potential mitigation solutions as required.</p> <p>The site-specific policy for C22/4 also includes requirements to retain and upgrade the existing public footpath to a surfaced route with the additional provision of a new route which connects to Roughton Road. This will provide a more sustainable means of connectivity that encourages active travel between the site and services and facilities located on Roughton Road.</p> <p>The site-specific policy includes mitigation requirements to offset the site's potential impact on the National Landscape. The Council provided a detailed response to the need to provide growth within the National Landscape and this is set out in the Council's Matter 5 Statement (EH011(a)(i)). A detailed site-specific assessment of the site's impact on the National Landscape is available to view in the Additional Sites Review Background Paper Appendix 1, the conclusion of which is that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape. Furthermore, the site-specific policy includes requirements to provide green infrastructure, retention of hedgerows and trees, provide open space and landscaping that maximises connectivity with the inclusion of biodiversity improvements and enhancements to existing key features such as the Beckett's Plantation.</p>
<p>Section</p>	<p>Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)</p>
<p>ID</p>	<p>FC295</p>

Response Date	16/12/2024 14:09:00
Full Name	Mr & Mrs R Barnett
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>We are extremely concerned that the proposed extension will have a very damaging effect on the immediate environment. The current road network would be unable to cope with vastly increased traffic movement and the impact on the wildlife in the area would be horrendous.</p> <p>The quality of life for local residents would be severely diminished and we are very concerned that doctors, schools and amenities would struggle to manage this additional burden.</p> <p>We would urge you to take all the above points into consideration during your review.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: We are extremely concerned that the proposed extension will have a very damaging effect on the immediate environment. The current road network would be unable to cope with vastly increased traffic movement and the impact on the wildlife in the area would be horrendous.</p> <p>The quality of life for local residents would be severely diminished and we are very concerned that doctors, schools and amenities would struggle to manage this additional burden.</p>
Officer Response	<p>Comments noted. The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole which has resulted in the requirement within the site-specific policy to provide conduct a Transport Assessment that includes the analysis of the development's impact on the local road network, including during construction periods, and identify any potential mitigation solutions as required.</p> <p>Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC301
Response Date	16/12/2024 16:16:00
Full Name	Mr David Brown
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I submit that this site has not been positively prepared and is unsound for the following reasons.</p> <p>1. Speaking to some of the tourists who visit Cromer some say they will never ever visit Cromer again due to the log jam of traffic blocking the coast road through Cromer. Tourism is the life blood of Cromer, the development of C22/4 would add significantly to the interminable traffic delays that \ plague Cromer during the long tourist season and may well reduce the number of tourists to Cromer upon which the town depends. I do not feel that this issue has been properly considered. Sheringham has not featured in the Local Plan yet has land available in the area around Back Common for development. Sheringham has good traffic flow during the tourist season and a development here or elsewhere would have negligible effect upon it. Moving some or all of the development of C22/4 here or to other parts of Sheringham would help safeguard Cromer's economy and make the tourists visiting Cromer wish to return rather than crossing Cromer off their places to visit list because of the never ending queues of slow moving traffic that plague Cromer during the tourist season.</p>

	<p>2. Page 9 paragraph 2.2.5. requires "safe pedestrian routes" to C22/4. The railway bridge on the A149 approach to this site may present significant problems here. The size of this site and the intended sports pitches ensures that this would be well used and may well present a possible danger to life as people find easier, riskier short cuts. To lessen the risk to life and reduce the footfall a suggested alternative for the sports pitches would be to have them on site C10/1. This is by some degree much closer to the town making it within easy reach to the inhabitants of Cromer and has an existing secure footpath almost up to the entrance of the site.</p> <p>3. Page 9 paragraph 2.2.5. mentions water and sewage requirements. last time this site was under consideration as site C22/2 there were doubts about Anglian Water's ability to provide these services. The new reservoir being built by Anglian Water to address water shortages is still years from completion.</p> <p>4. The infrastructure of Cromer cannot support development of this size, getting a doctors or dentists appointment in Cromer is already an exercise in futility and frustration and the education authority has given no firm commitment that it can handle extra growth. No provision for improvement to these services have been guaranteed to cope with this extra demand and should be sought before any development takes place.</p> <p>5. Agreements with other authorities (which could soon be merged) should be actively pursued to protect the Norfolk Coast National Landscape, Cromer's economy, fragile infrastructure and character. I politely request that North Norfolk District Council and the Planning Inspector consider Norwich as being better placed to accept the development plans for C22/4. Norwich has better infrastructure, is more capable of absorbing large developments and has brown field sites readily available for development. This would save 44 hectares of The Norfolk Coast National Landscape and contribute to sustainability in food supply.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	<p>No</p>
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>Object: Tourism is the life blood of Cromer, the development of C22/4 would add significantly to the interminable traffic delays that \ plague Cromer during the long tourist season and may well reduce the number of tourists to Cromer upon which the town depends. I do not feel that this issue has been properly considered. Sheringham has not featured in the Local Plan yet has land available in the area around Back Common for development.</p> <p>The railway bridge on the A149 approach to this site may present significant problems here. The size of this site and the intended sports pitches ensures that this would be well used and may well present a possible danger to life as people find easier, riskier short cuts. To lessen the risk to life and reduce the footfall a suggested alternative for the sports pitches would be to have them on site C10/1.</p> <p>Page 9 paragraph 2.2.5. mentions water and sewage requirements. last time this site was under consideration as site C22/2 there were doubts about Anglian Water's ability to provide these services. The new reservoir being built by Anglian Water to address water shortages is still years from completion.</p> <p>The infrastructure of Cromer cannot support development of this size, getting a doctors or dentists appointment in Cromer is already an exercise in futility and frustration and the education authority has given no firm commitment that it can handle extra growth. No provision for improvement to these services have been guaranteed to cope with this extra demand and should be sought before any development takes place.</p> <p>Agreements with other authorities (which could soon be merged) should be actively pursued to protect the Norfolk Coast National Landscape, Cromer's economy, fragile infrastructure and character. I politely request that North Norfolk District Council and the Planning Inspector consider Norwich as being better placed to accept the development plans for C22/4.</p>
<p>Officer Response</p>	<p>Comments noted. The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole which has resulted in the requirement within the site-specific policy to provide</p>

conduct a Transport Assessment that includes the analysis of the development's impact on the local road network, including during construction periods, and identify any potential mitigation solutions as required.

Sheringham is identified as a Small Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1, a number of allocations for the Local Plan have already been identified in this location. The review of additional sites as expressed within the Additional Sites Review Background Paper did not identify any suitable options within Sheringham beyond the existing allocations.

The location and quantum of sports pitch provision will be explored further through the application process and in accordance with the relevant policies in the Local Plan. The site-specific policy includes requirements to create and enhance connectivity throughout the site and Policy ENV 8 - High Quality Design includes reference to the need for safety considerations in design.

The site-specific policy includes requirements to the implementation of a surface water management plan that ensures there is no adverse effects on European sites and greenfield run-off rates are not increased. This is in addition to other requirements in the policy that require a foul drainage strategy to be undertaken and the provision of enhancements to sewerage infrastructure prior to the first occupation of any dwellings. Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (C4, Page 25). Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.

Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.

Throughout the Local Plan process the Council has engaged with all relevant neighbouring authorities in regard to Local Plan growth and cross boundary related issues. Norwich is not within the district of North-Norfolk and both authority areas should meet the housing targets identified in their respective Plans within their own authority boundaries.

Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC303
Response Date	17/12/2024 11:11:06
Full Name	Colette Coleman
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>C22/4 Land west of Pine Tree Farm - I have concerns that an initial plan for 400 dwellings has now increased to 600 dwellings and will result in a extensive loss of countryside where there is currently significant wildlife including deers, protected bats and birds. This extended plan will destroy their habitat and the increased light pollution will have a significant impact on bats. I have bats flying in my garden every evening in summer. I cannot find any evidence on your site of a bat survey being carried out at this proposed development or a survey being undertaken by Natural England on the habitat. I cannot find a reference to any consultation with Natural England which I understand to be a requirement where development affects a natural habitats site.</p> <p>The original plans recommended buffer zones to all exisiting developments on Burnt Hills and Roughton Road but there is no mention of this in the revised documents. A buffer zone to protect exisiting developments should be a requirement. These properties are mostly bungalows and any development in close proximity should reflect this and retain the character of the adjacent sites.</p> <p>The area off Roughton road currently offers dark skies with very little light pollution and this over development will substantially impact on this. As mentioned earlier this will also have a significant impact on the current wildlife at this location.</p> <p>The fields off of Roughton Road often contain surface water and with recent changes in rainfall these get waterlogged so drainage is a significant issue as increased runoff from 600 homes will have a considerable impact. The Environment evidence base contains a document for Strategic Flood Risk Assessment which was published in 2017. This is more than 6 years old and should be revisited if it is to form a basis for supporting massive development.</p>

600 homes on just this one site in Cromer is considerably in excess of those proposed for other small towns e.g North Walsham. There are no facilities at this site other than those in Cromer and the distance is not walkable for many people. This will result in a significant increase in traffic on roads that just about cope at present especially during summer months. Furthermore the infrastructure is inadequate for Cromers current population with a waiting list for a private dentist in excess of 2 years, no chance of getting an NHS dentist, the doctors surgery already over capacity and very busy schools.

Document EH011j iii) - Proposals to link footpaths to Roughton Road indicate that public transport is good but the services at Roughton Road station are every 2 hours unlike Cromer station and the bus service is infrequent. There are also no station parking facilities and no accessible access to the station. para 3.8 p11 states "route provides a high quality pedestrian and cycling route into town" I dispute this paragraph Current footpaths on Roughton Road are not good and are very slippery in winter with leaf fall. The road is narrow and is not suitable for cyclists. The pavements are certainly not wide enough and could not be made wide enough to provide a combined cycle/ pedestrian path and would be most dangerous for pedestrians if the cycle path was shared with pedestrians due to the gradient of Roughton road.

The last big development (though nothing on the scale of this proposal) by North Norfolk Homes on Roughton Road in 2015 took a number of years to build and it was evident in lockdown that at least a third of these homes were unoccupied and therefore purchased as 2nd homes. Yet the land they were built on was countryside. It is in my view indefensible for countryside to be destroyed merely to provide 2nd homes/holiday homes. Any new build property built on countryside should have restrictions in place to ensure that it is used as primary dwellings and be affordable. This was not the case on the last development. We will never be able to build enough homes if they are purchased as 2nd homes and left empty for most part of the year.

Do you consider it necessary to participate in a public hearing session, should these be required?

No

If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:

File (where submitted)

Officer Summary

Object: I have concerns that an initial plan for 400 dwellings has now increased to 600 dwellings and will result in a extensive loss of countryside where there is currently significant wildlife including deers, protected bats and birds. This extended plan will destroy their habitat and the increased light pollution will have a significant impact on bats. I have bats flying in my garden every evening in summer. I cannot find any evidence on your site of a bat survey being carried out.

The original plans recommended buffer zones to all exisiting developments on Burnt Hills and Roughton Road but there is no mention of this in the revised documents. A buffer zone to protect exisiting developments should be a requirement. The area off Roughton road currently offers dark skies with very little light pollution and this over development will substantially impact on this. As mentioned earlier this will also have a significant impact on the current wildlife at this location.

The fields off of Roughton Road often contain surface water and with recent changes in rainfall these get waterlogged so drainage is a significant issue as increased runoff from 600 homes will have a considerable impact. The Environment evidence base contains a document for Strategic Flood Risk Assessment which was published in 2017. This is more than 6 years old and should be revisited if it is to form a basis for supporting massive development.

600 homes on just this one site in Cromer is considerably in excess of those proposed for other small towns e.g North Walsham. There are no facilities at this site other than those in Cromer and the distance is not walkable for many people.

para 3.8 p11 states "route provides a high quality pedestrian and cycling route into town" I dispute this paragraph Current footpaths on Roughton Road are not good and are very slippery in winter with leaf fall. The road is narrow and is not suitable for cyclists. The pavements are certainly not wide enough and could not be made wide enough to provide a combined cycle/ pedestrian path and would be most dangerous for pedestrians if the cycle path was shared with pedestrians due to the gradient of Roughton road.

It is in my view indefensible for countryside to be destroyed merely to provide 2nd homes/holiday homes. Any new build property built on countryside should have restrictions in place to ensure that it is used as primary dwellings and be affordable. This was not the

	case on the last development. We will never be able to build enough homes if they are purchased as 2nd homes and left empty for most part of the year.
Officer Response	<p>Comments noted. The site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan, including Policy CC13 - Protecting Environmental Quality which makes reference to the requirement for proposals to minimise the impact on tranquillity and dark skies in North Norfolk and the adjoining Authorities' areas. If a bat survey is required to be undertaken for this site then this will be done so as part of the application process. The site-specific policy includes requirements to provide appropriate landscaping and provision of open space whilst also taking into account the site layout and building heights in the context of the wider landscape and existing built form.</p> <p>The site-specific policy includes requirements to the implementation of a surface water management plan that ensures there is no adverse effects on European sites and greenfield run-off rates are not increased. This is in addition to other requirements in the policy that require a foul drainage strategy to be undertaken and the provision of enhancements to sewerage infrastructure prior to the first occupation of any dwellings.</p> <p>Both Cromer and North Walsham are identified as a Large Growth Towns in the Local Plan's Settlement Hierarchy and Policy SS1 and are sustainable locations for development. The Local Plan includes allocations for North Walsham which includes NW62/A - Land West of North Walsham, a large scale sustainable urban extension. The site-specific policy for C22/4 includes requirements to retain and upgrade the existing public footpath to a surfaced route with the additional provision or a new route which connects to Roughton Road. This will provide a more sustainable means of connectivity that encourages active travel between the site and services and facilities located on Roughton Road. The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC304
Response Date	16/12/2024 16:37:00
Full Name	Mrs Yvonne Ford
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I wish to raise my objections to the proposed development site for 500 houses.</p> <ol style="list-style-type: none"> 1 This land is NOT in Cromer, but lies within the parish boundaries of Roughton & Northrepps. 2 The proposed development would greatly impact and alter the existing character of the settlement, disrupting the visual and spatial cohesion of this part of Roughton. Such a large amount of housing would create more traffic and cause light pollution. We currently enjoy dark skies, with no streetlights or football floodlights. Privacy would be compromised - from 229 Roughton Road the dwellings are bungalows, so would be overlooked by taller houses. Modern house design is incompatible with the historic nature of existing houses. 3 The planned footpaths appear to be excessively wide, suggestive that there would be future plans to make these into road accesses providing a cut-through and 'rat-run' from the Norwich Road. The Highways Department has already stated that Roughton Road is NOT suitable for increased traffic flow. 4 This extension would impact severely on the AONB land. The area with its fields, hedgerows, banks and ditches support a wide variety of wildlife, including nesting skylarks, norfolk plovers, barn owls, marsh harrier, kestrels, several species of bats, frogs and newts. Wildflowers, such as bluebells, purple-spotted orchid and native daffodils are among the gems to be found here. Not only will this result in a loss of valuable habitat for these 'red listed' species, but increased human activity will be devastating to the biodiversity, especially when so many birds, insects and animals are in serious decline. 5 As shown with the previous planned development off the Roughton Road (Sayers close, Cromer) very few of the dwellings were affordable homes for local people to rent or buy. Just more expensive properties for more incomers! The local infrastructure; GP surgery, Roughton and Northrepps primary schools would all struggle to accommodate an influx from 500 dwellings. How could the council guarantee a minimum 50% quota, half for local people if no restrictions are applied, for example, having lived in Roughton, Northrepps or Cromer for the past 15 years? The building traffic from the previous Sayers close development not only damaged road surfaces with the 4x daily gravel,

	<p>sand etc deliveries, but damaged verges of properties when running over them to allow vehicles to pass on the narrow road. This <u>must not</u> happen again.</p> <p>6 The proposal of a sports field at first sounds very innocuous. But this comes with floodlights to pollute our dark skies. Floodlights should NOT be allowed. Take a look at Bodham's football field where flood lights 30 feet high shine all over the village and light up the sky for 3 miles around. Clubhouses will be rented out for parties and events, leading to more traffic and more noise. This together with the inevitable mayhem of the weekly car-boot sale is allowed NO THANK YOU.</p> <p>7 We should all be extremely concerned at the loss of prime farming land, this country's output is falling, we can no longer feed ourselves, relying more and more on imports, adding food miles and increasing the carbon footprint. Surely brownfield sites are preferable as at Overstrand Road and it lies Cromer's boundaries not Roughton's!</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>Object: This land is NOT in Cromer, but lies within the parish boundaries of Roughton & Northrepps. The proposed development would greatly impact and alter the existing character of the settlement, disrupting the visual and spatial cohesion of this part of Roughton. Such a large amount of housing would create more traffic and cause light pollution. We currently enjoy dark skies, with no streetlights or football floodlights. Privacy would be compromised - from 229 Roughton Road the dwellings are bungalows, so would be overlooked by taller houses.</p> <p>The planned footpaths appear to be excessively wide, suggestive that there would be future plans to make these into road accesses providing a cut-through and 'rat-run' from the Norwich Road. The Highways Department has already stated that Roughton Road is <u>NOT</u> suitable for increased traffic flow.</p> <p>This extension would impact severely on the AONB land. The area with its fields, hedgerows, banks and ditches support a wide variety of wildlife.</p> <p>The local infrastructure; GP surgery, Roughton and Northrepps primary schools would all struggle to accommodate an influx from 500 dwellings. The building traffic from the previous Sayers close development not only damaged road surfaces with the 4x daily gravel, sand etc deliveries, but damaged verges of properties when running over them to allow vehicles to pass on the narrow road. This <u>must not</u> happen again.</p> <p>We should all be extremely concerned at the loss of prime farming land, this country's output is falling, we can no longer feed ourselves, relying more and more on imports, adding food miles and increasing the carbon footprint. Surely brownfield sites are preferable as at Overstrand Road and it lies Cromer's boundaries not Roughton's!</p>
<p>Officer Response</p>	<p>Comments noted. Whilst located on the edge of Cromer's settlement boundary, the site does lie within the parish boundaries of Roughton and Northrepps. However, the site is most closely related to Cromer and services and facilities therein and does not conflict with the operation of the Small Growth Village approach set out in the Local Plan. The operation of Policy SS1 Spatial Strategy does not relate to parish boundaries but relies upon the defined settlement boundaries for the Selected Settlements. The defined settlement boundaries can be found on the Policies Map [Examination ref. A2]. In addition, settlement boundary reviews for all Small Growth Villages are evidenced in Background Paper 11 [Examination ref.C11].</p> <p>The site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan, including Policy CC13 - Protecting Environmental Quality which makes reference to air quality and the requirement for development proposals to minimise and take every opportunity to reduce through proportionate mitigation measures, all emissions, contamination and other forms of pollution. The exact masterplanning of the site will be explored and consulted on through the application process.</p> <p>The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and as a result of discussions relating to this consultation, the Highways Authority confirmed that vehicular access onto Roughton Road from either C22/4 or C19/2 is unsuitable and not supported. Furthermore, the site-specific policy includes a requirement to provide a Transport Assessment that includes the analysis of the development's impact on the local road network, including during construction periods, and identify any potential mitigation solutions as required.</p>

The site-specific policy includes mitigation requirements to offset the site's potential impact on the National Landscape. The Council provided a detailed response to the need to provide growth within the National Landscape and this is set out in the Council's Matter 5 Statement (EH011(a)(i)). A detailed site-specific assessment of the site's impact on the National Landscape is available to view in the Additional Sites Review Background Paper Appendix 1, the conclusion of which is that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape.

The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy.

The site lies within Grade 2 agricultural land and also Grade 2, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. Cromer is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.

Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC307
Response Date	16/12/2024 21:59:33
Full Name	Mr Stephen Matthews
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>1. Environmental Impact The proposed development poses a significant threat to the local environment. Increased pollution, habitat destruction, and loss of biodiversity are imminent risks. The area is home to several protected species, and any disruption could have irreversible consequences.</p> <p>2. Traffic Congestion The development will lead to a substantial increase in traffic in an already congested area. The current infrastructure cannot support the additional vehicle volume, resulting in longer commute times, increased air pollution, and a higher risk of accidents.</p> <p>3. Preservation of Outstanding Natural Beauty The site is located within an Area of Outstanding Natural Beauty (AONB). The development would drastically alter the landscape, detracting from the natural beauty that attracts visitors and contributes to the local community's identity and economy.</p> <p>4. Mental Well-being The peace and tranquility of the local community are at risk. The development will introduce noise, pollution, and visual blight, negatively impacting residents' quality of life and mental health.</p> <p>5. Strain on Local Services Local services, including GP surgeries and schools, are already operating at or beyond capacity. The proposed development will exacerbate this strain, leading to reduced care and education standards for current and new residents.</p> <p>6. Ecosystem Impact The site's ecosystem supports local wildlife and maintains ecological balance. The development threatens this balance, potentially harming plant and animal species dependent on this habitat.</p> <p>7. Low Employment Opportunities</p>

	<p>The proposed development does not offer sufficient employment opportunities to justify its negative impacts. This will likely lead to increased unemployment and economic instability in the area.</p> <p>8. Loss of Farming Land and Food Security The development will result in the loss of valuable farming land, essential for local food production and sustainability. This loss undermines the agricultural heritage and future food security of the region.</p> <p>9. Low Water Pressure The current water supply infrastructure is inadequate and already suffers from low pressure. The additional demand from the proposed development will exacerbate this issue, leading to further water pressure problems for existing residents.</p> <p>10. Highways Agency Rejection The Highways Agency has already rejected the proposal, highlighting significant concerns about the impact on local traffic and infrastructure. Ignoring this expert advice would be irresponsible and detrimental to the community.</p> <p>11. Council Budget Concerns The development will place additional financial strain on the council's budget. Increased costs for infrastructure, public services, and maintenance will burden taxpayers and reduce the funds available for other essential services.</p> <p>12. Cromer No Longer the Gem of the North Norfolk Coast The proposed development threatens to diminish Cromer's charm and reputation as the gem of the North Norfolk coast. The area's natural beauty, peaceful environment, and cultural heritage are crucial to its identity and appeal, which will be compromised by the development.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	<p>Yes</p>
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	<p>To object to this proposal</p>
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>Object: The proposed development poses a significant threat to the local environment. Increased pollution, habitat destruction, and loss of biodiversity are imminent risks. The area is home to several protected species, and any disruption could have irreversible consequences.</p> <p>The development will lead to a substantial increase in traffic in an already congested area. The current infrastructure cannot support the additional vehicle volume, resulting in longer commute times, increased air pollution, and a higher risk of accidents.</p> <p>The site is located within an Area of Outstanding Natural Beauty (AONB). The development would drastically alter the landscape, detracting from the natural beauty that attracts visitors and contributes to the local community's identity and economy. The peace and tranquility of the local community are at risk. The development will introduce noise, pollution, and visual blight, negatively impacting residents' quality of life and mental health.</p> <p>Local services, including GP surgeries and schools, are already operating at or beyond capacity. The proposed development will exacerbate this strain, leading to reduced care and education standards for current and new residents. The proposed development does not offer sufficient employment opportunities to justify its negative impacts. This will likely lead to increased unemployment and economic instability in the area.</p> <p>The development will result in the loss of valuable farming land, essential for local food production and sustainability. This loss undermines the agricultural heritage and future food security of the region.</p> <p>The current water supply infrastructure is inadequate and already suffers from low pressure. The additional demand from the proposed development will exacerbate this issue, leading to further water pressure problems for existing residents.</p> <p>The development will place additional financial strain on the council's budget. Increased costs for infrastructure, public services, and maintenance will burden taxpayers and reduce the funds available for other essential services. The proposed development threatens to diminish Cromer's charm and reputation as the gem of the North Norfolk coast. The area's natural beauty, peaceful environment, and cultural heritage are crucial to its identity and appeal, which will be compromised by the development.</p>

Officer Response	<p>Comments noted. The site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan, including Policy CC13 - Protecting Environmental Quality which makes reference to air quality and the requirement for development proposals to minimise and take every opportunity to reduce through proportionate mitigation measures, all emissions, contamination and other forms of pollution.</p> <p>The site-specific policy includes mitigation requirements to offset the site's potential impact on the National Landscape. The Council provided a detailed response to the need to provide growth within the National Landscape and this is set out in the Council's Matter 5 Statement (EH011(a)(i)). A detailed site-specific assessment of the site's impact on the National Landscape is available to view in the Additional Sites Review Background Paper Appendix 1, the conclusion of which is that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape.</p> <p>The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy and is one of prime locations for employment opportunities in North-Norfolk. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p> <p>The site lies within Grade 2 agricultural land and also Grade 2, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.</p> <p>The site-specific policy includes requirements to the implementation of a surface water management plan that ensures there is no adverse effects on European sites and greenfield run-off rates are not increased. This is in addition to other requirements in the policy that require a foul drainage strategy to be undertaken and the provision of enhancements to sewerage infrastructure prior to the first occupation of any dwellings.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC309
Response Date	16/12/2024 22:27:12
Full Name	Mrs Trudi Lawson-Matthews
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<ol style="list-style-type: none"> 1. Environmental Impact The proposed development poses a significant threat to the local environment. Increased pollution, habitat destruction, and loss of biodiversity are imminent risks. The area is home to several protected species, and any disruption could have irreversible consequences. 2. Traffic Congestion The development will lead to a substantial increase in traffic in an already congested area. The current infrastructure cannot support the additional vehicle volume, resulting in longer commute times, increased air pollution, and a higher risk of accidents. 3. Preservation of Outstanding Natural Beauty The site is located within an Area of Outstanding Natural Beauty (AONB). The development would drastically alter the landscape, detracting from the natural beauty that attracts visitors and contributes to the local community's identity and economy. 4. Mental Well-being

The peace and tranquility of the local community are at risk. The development will introduce noise, pollution, and visual blight, negatively impacting residents' quality of life and mental health.

5. Strain on Local Services
Local services, including GP surgeries and schools, are already operating at or beyond capacity. The proposed development will exacerbate this strain, leading to reduced care and education standards for current and new residents.

6. Ecosystem Impact
The site's ecosystem supports local wildlife and maintains ecological balance. The development threatens this balance, potentially harming plant and animal species dependent on this habitat.

7. Low Employment Opportunities
The proposed development does not offer sufficient employment opportunities to justify its negative impacts. This will likely lead to increased unemployment and economic instability in the area.

8. Loss of Farming Land and Food Security
The development will result in the loss of valuable farming land, essential for local food production and sustainability. This loss undermines the agricultural heritage and future food security of the region.

9. Low Water Pressure
The current water supply infrastructure is inadequate and already suffers from low pressure. The additional demand from the proposed development will exacerbate this issue, leading to further water pressure problems for existing residents.

10. Highways Agency Rejection
The Highways Agency has already rejected the proposal, highlighting significant concerns about the impact on local traffic and infrastructure. Ignoring this expert advice would be irresponsible and detrimental to the community.

11. Council Budget Concerns
The development will place additional financial strain on the council's budget. Increased costs for infrastructure, public services, and maintenance will burden taxpayers and reduce the funds available for other essential services.

12. Cromer No Longer the Gem of the North Norfolk Coast
The proposed development threatens to diminish Cromer's charm and reputation as the gem of the North Norfolk coast. The area's natural beauty, peaceful environment, and cultural heritage are crucial to its identity and appeal, which will be compromised by the development.

Do you consider it necessary to participate in a public hearing session, should these be required?

Yes

If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:

To object to this proposal

File (where submitted)

Officer Summary

Object: The proposed development poses a significant threat to the local environment. Increased pollution, habitat destruction, and loss of biodiversity are imminent risks. The area is home to several protected species, and any disruption could have irreversible consequences.

The development will lead to a substantial increase in traffic in an already congested area. The current infrastructure cannot support the additional vehicle volume, resulting in longer commute times, increased air pollution, and a higher risk of accidents.

The site is located within an Area of Outstanding Natural Beauty (AONB). The development would drastically alter the landscape, detracting from the natural beauty that attracts visitors and contributes to the local community's identity and economy. The peace and tranquility of the local community are at risk. The development will introduce noise, pollution, and visual blight, negatively impacting residents' quality of life and mental health.

Local services, including GP surgeries and schools, are already operating at or beyond capacity. The proposed development will exacerbate this strain, leading to reduced care and education standards for current and new residents. The proposed development does not offer sufficient employment opportunities to justify its negative impacts. This will likely lead to increased unemployment and economic instability in the area.

The development will result in the loss of valuable farming land, essential for local food production and sustainability. This loss undermines the agricultural heritage and future food security of the region.

	<p>The current water supply infrastructure is inadequate and already suffers from low pressure. The additional demand from the proposed development will exacerbate this issue, leading to further water pressure problems for existing residents.</p> <p>The development will place additional financial strain on the council's budget. Increased costs for infrastructure, public services, and maintenance will burden taxpayers and reduce the funds available for other essential services. The proposed development threatens to diminish Cromer's charm and reputation as the gem of the North Norfolk coast. The area's natural beauty, peaceful environment, and cultural heritage are crucial to its identity and appeal, which will be compromised by the development.</p>
Officer Response	<p>Comments noted. The site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan, including Policy CC13 - Protecting Environmental Quality which makes reference to air quality and the requirement for development proposals to minimise and take every opportunity to reduce through proportionate mitigation measures, all emissions, contamination and other forms of pollution.</p> <p>The site-specific policy includes mitigation requirements to offset the site's potential impact on the National Landscape. The Council provided a detailed response to the need to provide growth within the National Landscape and this is set out in the Council's Matter 5 Statement (EH011(a)(i)). A detailed site-specific assessment of the site's impact on the National Landscape is available to view in the Additional Sites Review Background Paper Appendix 1, the conclusion of which is that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape.</p> <p>The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy and is one of prime locations for employment opportunities in North-Norfolk. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p> <p>The site lies within Grade 2 agricultural land and also Grade 2, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.</p> <p>The site-specific policy includes requirements to the implementation of a surface water management plan that ensures there is no adverse effects on European sites and greenfield run-off rates are not increased. This is in addition to other requirements in the policy that require a foul drainage strategy to be undertaken and the provision of enhancements to sewerage infrastructure prior to the first occupation of any dwellings.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC310
Response Date	18/12/2024 09:04:28
Full Name	Mr Chris Lawson-Duddington
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	I have carefully reviewed the proposed development, and my objections are as follows:

	<p>1 Impact on Local Character: The proposed development is not in keeping with the character of the surrounding area. It will adversely affect the aesthetics and harmony of our community, which predominantly consists of detached and semi detached bungalows .</p> <p>2 Environmental Concerns: There are significant environmental implications associated with this development. The construction will potentially disturb the local wildlife habitat, particularly affecting Marsh Harriers, Bats & Norfolk Plover all on the endangered species</p> <p>3 Traffic and Parking Issues: The proposed development will lead to increased traffic and parking problems. Our roads are already congested, and the addition of these new units will exacerbate these issues, leading to safety concerns for pedestrians and cyclists.</p> <p>4 Impact on Local Amenities and Services: The local infrastructure, including schools, healthcare facilities, and public transport, is already under strain. The additional burden from the proposed development will diminish the quality of these services for current and future residents.</p> <p>5 Privacy and Overlooking: The scale and size of the proposed development leads to privacy concerns, with windows and balconies directly overlooking existing properties. This will significantly impact the privacy and quality of life and mental wellbeing for current residents.</p> <p>I urge the planning committee to consider these objections seriously and to reject the application in its current form. Thank you for your attention to this matter.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	<p>No</p>
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>Object: The proposed development is not in keeping with the character of the surrounding area. It will adversely affect the aesthetics and harmony of our community, which predominantly consists of detached and semi detached bungalows. There are significant environmental implications associated with this development. The construction will potentially disturb the local wildlife habitat, particularly affecting Marsh Harriers, Bats & Norfolk Plover all on the endangered species</p> <p>The proposed development will lead to increased traffic and parking problems. Our roads are already congested, and the addition of these new units will exacerbate these issues, leading to safety concerns for pedestrians and cyclists. The local infrastructure, including schools, healthcare facilities, and public transport, is already under strain. The additional burden from the proposed development will diminish the quality of these services for current and future residents.</p> <p>The scale and size of the proposed development leads to privacy concerns, with windows and balconies directly overlooking existing properties. This will significantly impact the privacy and quality of life and mental wellbeing for current residents.</p>
<p>Officer Response</p>	<p>Comments noted. The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p> <p>The site-specific policy includes requirements for the site to be designed in such a way that it pays careful attention to the site's layout, building heights and materials used. The exact masterplanning for the site will be explored and consulted on through the application process. Furthermore, the site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan, including Policy ENV 8 - High Quality Design. The site-specific policy includes requirements to provide green infrastructure, retention of hedgerows and trees, provide open space and landscaping that maximises connectivity with the inclusion of biodiversity improvements and enhancements to existing key features such as the Beckett's Plantation.</p>

	The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole which has resulted in the requirement within the site-specific policy to provide a Transport Assessment that includes the analysis of the development's impact on the local road network, including during construction periods, and identify any potential mitigation solutions as required.
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC311
Response Date	18/12/2024 09:24:06
Full Name	Mrs Annabelle Lawson
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I wish to object to proposed planning for Land west of Pine Tree Farm [C22/4] extended site allocation [Cromer]</p> <p>I wish to object for the following reasons:</p> <ul style="list-style-type: none"> • A large housing development will have a negative impact on the environment. The green areas surrounding Roughton will be eroded. The natural habitat for wildlife will be destroyed. Increased human activity/ population will lead to a decline in vital plant and animal populations. • The extension to the site allocation would massively impact the Norfolk Coast Protected Landscape as an area of designated beauty. You would effectively erode all large green spaces. It goes against National guidance which advises against major development in areas of natural beauty. It will have significant impact on the visual area of Cromer and will not fit in with the character and current aesthetics of the area. Surely the Council want to maintain Cromer as the gem of the Norfolk Coast? • The large scale planning would have a negative impact on the current residents living within the area. Their mental well – being will be effected greatly. The residents will be subjected to increased pollution with the building, noise and erosion of green spaces alongside increased road traffic movements. Current access to public footpaths and un- developed countryside will be lost forever not only for existing generations but future generations to follow. • The erosion of farm land undermines our capacity for our own food security. The country's capacity to produce food for itself is diminishing all the time. We need to be self-reliant as a nation and confident in being able to support and feed our population and not rely on other countries for imports. • The current road system does not allow for an increased number of cars due to a large housing development. Buses already struggle to navigate Roughton Road. It is sacrilegious to cut up farm land to build a new road in order to build a massive housing development. The council will effectively turn Cromer into a concrete jungle and large housing estate. Are they trying to eradicate an area of natural beauty? • The current infrastructure is not adequate for increased demand on essential services. • The current wellbeing of residences will be impacted further by additional demand on NHS services, Education providers and social care. The services are already stretched to the limit and under financial difficulty. • The infrastructure does not provide employment for an increased number of residents. The vast majority of jobs within the area are temporary/ short term. This will put further pressure on the local area and cause unemployment. <p>The council has a responsibility to its current residents mental well –being. Residents are entitled to live in a safe environment with access to clean public spaces and live in harmony with the natural world around them. Is not Cromer beautiful enough to stand up and fight for? Surely the council want to maintain Cromer as an area of natural beauty. Once the green areas been eradicated they cannot be replaced. Our area of natural beauty will be lost forever. The character of Cromer and in particular Roughton will be changed irrevocably. There is nothing to gain by this proposed planning and everything to loose.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	To object to planning

File (where submitted)	
Officer Summary	<p>Object: The green areas surrounding Roughton will be eroded. The natural habitat for wildlife will be destroyed. Increased human activity/ population will lead to a decline in vital plant and animal populations. The extension to the site allocation would massively impact the Norfolk Coast Protected Landscape as an area of designated beauty. You would effectively erode all large green spaces. It goes against National guidance which advises against major development in areas of natural beauty. It will have significant impact on the visual area of Cromer and will not fit in with the character and current aesthetics of the area.</p> <p>The residents will be subjected to increased pollution with the building, noise and erosion of green spaces alongside increased road traffic movements. Current access to public footpaths and un- developed countryside will be lost forever not only for existing generations but future generations to follow.</p> <p>The erosion of farm land undermines our capacity for our own food security. The country's capacity to produce food for itself is diminishing all the time.</p> <p>The current road system does not allow for an increased number of cars due to a large housing development. Buses already struggle to navigate Roughton Road. It is sacrilegious to cut up farm land to build a new road in order to build a massive housing development.</p> <p>The current infrastructure is not adequate for increased demand on essential services. The services are already stretched to the limit and under financial difficulty. The infrastructure does not provide employment for an increased number of residents.</p> <p>The council has a responsibility to its current residents mental well –being. Residents are entitled to live in a safe environment with access to clean public spaces and live in harmony with the natural world around them.</p>
Officer Response	<p>Comments noted. The site-specific policy includes requirements to provide green infrastructure, retention of hedgerows and trees, provide open space and landscaping that maximises connectivity with the inclusion of biodiversity improvements and enhancements to existing key features such as the Beckett's Plantation. The site-specific policy includes mitigation requirements to offset the site's potential impact on the National Landscape. The Council provided a detailed response to the need to provide growth within the National Landscape and this is set out in the Council's Matter 5 Statement (EH011(a)(i)). A detailed site-specific assessment of the site's impact on the National Landscape is available to view in the Additional Sites Review Background Paper Appendix 1, the conclusion of which is that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape.</p> <p>The site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan, including Policy CC13 - Protecting Environmental Quality which makes reference to air quality and the requirement for development proposals to minimise and take every opportunity to reduce through proportionate mitigation measures, all emissions, contamination and other forms of pollution. The site-specific policy for C22/4 includes requirements to retain and upgrade the existing public footpath to a surfaced route with the additional provision of a new route which connects to Roughton Road. This will provide a more sustainable means of connectivity that encourages active travel between the site and services and facilities located on Roughton Road.</p> <p>The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of agricultural land would prevent the level of growth needed as identified in the Local Plan, the Council has a Brownfield Register however, there are not enough sites on this register to accommodate the required growth needed as set out in Policy SS1 and many potential brownfield sites are unsuitable due to location or other constraints.</p> <p>The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole which has resulted in the requirement within the site-specific policy to provide a Transport Assessment that includes the analysis of the development's impact on the local road network, including during construction periods, and identify any potential mitigation solutions as required.</p> <p>Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability. Cromer is one of the larger settlements in North-Norfolk and is best situated to provide employment</p>

	opportunities either through this development or other means in addition to its public transport connectivity to other urban areas such as Norwich.
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC313
Response Date	16/12/2024 19:31:00
Full Name	Gordon Ford
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I wish to raise my objections to the proposed development site for 500 houses.</p> <ol style="list-style-type: none"> 1. This land is NOT in Cromer, but lies within the parish boundaries of Roughton & Northrepps. 2. The proposed development would greatly impact and alter the existing character of the settlement, disrupting the visual and spatial cohesion of this part of Roughton. Such a large amount of housing would create more traffic and cause light pollution. We currently enjoy dark skies, with no streetlights or football floodlights. Privacy would be compromised - from 229 Roughton Road the dwellings are bungalows, so would be overlooked by taller houses. Modern house design is incompatible with the historic nature of existing houses. 3. The planned footpaths appear to be excessively wide, suggestive that there would be future plans to make these into road accesses providing a cut-through and 'rat-run' from the Norwich Road. The Highways Department has already stated that Roughton Road is <u>NOT</u> suitable for increased traffic flow. 4. This extension would impact severely on the AONB land. The area with its fields, hedgerows, banks and ditches support a wide variety of wildlife, including nesting skylarks, norfolk plovers, barn owls, marsh harrier, kestrels, several species of bats, frogs and newts. Wildflowers, such as bluebells, purple-spotted orchid and native daffodils are among the gems to be found here. Not only will this result in a loss of valuable habitat for these 'red listed' species, but increased human activity will be devastating to the biodiversity, especially when so many birds, insects and animals are in serious decline. 5. As shown with the previous planned development off the Roughton Road (Sayers close, Cromer) very few of the dwellings were affordable homes for local people to rent or buy. Just more expensive properties for more incomers! The local infrastructure; GP surgery, Roughton and Northrepps primary schools would all struggle to accommodate an influx from 500 dwellings. How could the council guarantee a minimum 50% quota, half for local people if no restrictions are applied, for example, having lived in Roughton, Northrepps or Cromer for the past 15 years? The building traffic from the previous Sayers close development not only damaged road surfaces with the 4x daily gravel, sand etc deliveries, but damaged verges of properties when running over them to allow vehicles to pass on the narrow road. This <u>must not</u> happen again. 6. The proposal of a sports field at first sounds very innocuous. But this comes with floodlights to pollute our dark skies. Floodlights should NOT be allowed. Take a look at Bodham's football field where flood lights 30 feet high shine all over the village and light up the sky for 3 miles around. Clubhouses will be rented out for parties and events, leading to more traffic and more noise. This together with the inevitable mayhem of the weekly car-boot sale is allowed NO THANK YOU. 7. We should all be extremely concerned at the loss of prime farming land, this country's output is falling, we can no longer feed ourselves, relying more and more on imports, adding food miles and increasing the carbon footprint. Surely brownfield sites are preferable as at Overstrand Road and it lies Cromer's boundaries not Roughton's!
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: This land is NOT in Cromer, but lies within the parish boundaries of Roughton & Northrepps. The proposed development would greatly impact and alter the existing character

of the settlement, disrupting the visual and spatial cohesion of this part of Roughton. Such a large amount of housing would create more traffic and cause light pollution. We currently enjoy dark skies, with no streetlights or football floodlights. Privacy would be compromised - from 229 Roughton Road the dwellings are bungalows, so would be overlooked by taller houses.

The planned footpaths appear to be excessively wide, suggestive that there would be future plans to make these into road accesses providing a cut-through and 'rat-run' from the Norwich Road. The Highways Department has already stated that Roughton Road is NOT suitable for increased traffic flow.

This extension would impact severely on the AONB land. The area with its fields, hedgerows, banks and ditches support a wide variety of wildlife.

The local infrastructure; GP surgery, Roughton and Northrepps primary schools would all struggle to accommodate an influx from 500 dwellings. The building traffic from the previous Sayers close development not only damaged road surfaces with the 4x daily gravel, sand etc deliveries, but damaged verges of properties when running over them to allow vehicles to pass on the narrow road. This must not happen again.

We should all be extremely concerned at the loss of prime farming land, this country's output is falling, we can no longer feed ourselves, relying more and more on imports, adding food miles and increasing the carbon footprint. Surely brownfield sites are preferable as at Overstrand Road and it lies Cromer's boundaries not Roughton's!

Officer Response

Comments noted. Whilst located on the edge of Cromer's settlement boundary, the site does lie within the parish boundaries of Roughton and Northrepps. However, the site is most closely related to Cromer and services and facilities therein and does not conflict with the operation of the Small Growth Village approach set out in the Local Plan. The operation of Policy SS1 Spatial Strategy does not relate to parish boundaries but relies upon the defined settlement boundaries for the Selected Settlements. The defined settlement boundaries can be found on the Policies Map [Examination ref. A2]. In addition, settlement boundary reviews for all Small Growth Villages are evidenced in Background Paper 11 [Examination ref.C11].

The site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan, including Policy CC13 - Protecting Environmental Quality which makes reference to air quality and the requirement for development proposals to minimise and take every opportunity to reduce through proportionate mitigation measures, all emissions, contamination and other forms of pollution. The exact masterplanning of the site will be explored and consulted on through the application process.

The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and as a result of discussions relating to this consultation, the Highways Authority confirmed that vehicular access onto Roughton Road from either C22/4 or C19/2 is unsuitable and not supported. Furthermore, the site-specific policy includes a requirement to provide a Transport Assessment that includes the analysis of the development's impact on the local road network, including during construction periods, and identify any potential mitigation solutions as required.

The site-specific policy includes mitigation requirements to offset the site's potential impact on the National Landscape. The Council provided a detailed response to the need to provide growth within the National Landscape and this is set out in the Council's Matter 5 Statement (EH011(a)(i)). A detailed site-specific assessment of the site's impact on the National Landscape is available to view in the Additional Sites Review Background Paper Appendix 1, the conclusion of which is that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape.

The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy.

The site lies within Grade 2 agricultural land and also Grade 2, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. Cromer is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line

	with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC314
Response Date	16/12/2024 17:42:00
Full Name	Mr & Mrs Peter & Patricia Lay
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>The increase in Traffic would make the whole area unsafe in as much as many of the roads are narrow without footpaths or refuge for pedestrians. Any larger vehicles will have a negative impact on the flow of traffic as they would be unable to pass oncoming traffic.</p> <p>The general increase in population would have dire effects upon local health services. It is difficult enough to get a Doctors appointment now, with many, many more residents it would become impossible.</p> <p>Any children of school age have a long way to travel to both Junior and Primary Schools, leading to an increase in vehicles dropping off children at school, (already a problem). Cromer High school would also involve a car journey as it is unsafe to walk along Roughton Road as there is no footpath and with the increase in traffic adding to the problem.</p> <p>Take into account the damage to the eco system and the damage to an AONB this development is a potential disaster and is totally against the wishes of the local populace.</p> <p>I am unsure whether this is the same proposal that has been rejected in the past or just a modification of the same.</p> <p>I would urge the Planning Authority to reject this unwanted development.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: The increase in Traffic would make the whole area unsafe in as much as many of the roads are narrow without footpaths or refuge for pedestrians. Any larger vehicles will have a negative impact on the flow of traffic as they would be unable to pass oncoming traffic.</p> <p>The general increase in population would have dire effects upon local health services. It is difficult enough to get a Doctors appointment now, with many, many more residents it would become impossible. Any children of school age have a long way to travel to both Junior and Primary Schools, leading to an increase in vehicles dropping off children at school, (already a problem). Cromer High school would also involve a car journey as it is unsafe to walk along Roughton Road as there is no footpath and with the increase in traffic adding to the problem.</p> <p>Take into account the damage to the eco system and the damage to an AONB this development is a potential disaster and is totally against the wishes of the local populace.</p>
Officer Response	<p>Object: The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole which has resulted in the requirement within the site-specific policy to provide a Transport Assessment that includes the analysis of the development's impact on the local road network, including during construction periods, and identify any potential mitigation solutions as required.</p> <p>The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning in Health Protocol. The protocol presents a process describing how relevant NHS organisations, Norfolk & Suffolk County Councils, Public Health and the Norfolk and East Suffolk Local Planning Authorities jointly engage to ensure that health considerations are adequately accounted for in plan making and in planning applications and their subsequent developments so that the appropriate authorities can plan and priorities investment(s). Developer contributions would be sought as part of any detailed application proposals in</p>

	<p>accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p> <p>The site-specific policy for C22/4 includes requirements to retain and upgrade the existing public footpath to a surfaced route with the additional provision of a new route which connects to Roughton Road. This will provide a more sustainable means of connectivity that encourages active travel between the site and services and facilities located on Roughton Road.</p> <p>The site-specific policy includes mitigation requirements to offset the site's potential impact on the National Landscape. The Council provided a detailed response to the need to provide growth within the National Landscape and this is set out in the Council's Matter 5 Statement (EH011(a)(i)). A detailed site-specific assessment of the site's impact on the National Landscape is available to view in the Additional Sites Review Background Paper Appendix 1, the conclusion of which is that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC315
Response Date	16/12/2024 17:44:00
Full Name	Ron Roper
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>This should be rejected for the following reasons.</p> <p>The proposed building will add to the already serious congestion in and around the town during the summer months as the majority of large shops are to the west of the town and this development is more than a mile outside the town centre requiring transport and parking facilities whilst land within the natural boundary of the railway line and reasonable walking distance remains as a pick your own small holding, pop up campsite and very occasional entertainment, all of which is in use for a very limited period of time during the year.</p> <p>A common problem specific to coastal developments as shown by council records is second home ownership accounting for a significant part of new and existing housing depletion.</p> <p>Under the government's new guidelines it would appear all land should now be assessed for suitable housing needs, no longer determined by local landowners' discretionary powers on available land or inherited privileges.</p> <p>Becketts plantation lies at the centre of this development and hosts many protected species including bats, barn owls as well as migrating tawny owls & jays, barn owls, rare honey buzzards, brown hares, roe deer, all will be displaced by this disruption to their habitat, sadly disappearing by the very people that are responsible for its protection.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: The proposed building will add to the already serious congestion in and around the town during the summer months as the majority of large shops are to the west of the town and this development is more than a mile outside the town centre requiring transport and parking facilities.

	<p>Under the governments new guidelines it would appear all land should now be assessed for suitable housing needs, no longer determined by local landowners discretionary powers on available land or inherited privileges.</p> <p>Becketts plantation lays at the centre of this development and hosts many protected species</p>
Officer Response	<p>Comments noted. The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole which has resulted in the requirement within the site-specific policy to provide a Transport Assessment that includes the analysis of the development's impact on the local road network, including during construction periods, and identify any potential mitigation solutions as required. The site-specific policy requires the provision of suitable connectivity from the site into the settlement.</p> <p>The identification of this site in the Local Plan is a result of an initial HELAA assessment undertaken in 2017 that provided an assessment of a large number of sites provided to the Council through the public Call for Sites process or allocations carried over from the previous Plan. The HELAA assesses sites individually and is a high-level desktop study that informed the early plan process and the districts capacity for residential development, it does not identify allocations and is not the full assessment that informed the Local Plan (this is found in Exam Doc, D3 & Appendix 1 of the Additional Sites Review Background Paper). The full site assessment process is explained in Background paper 6 - Development Site Selection Methodology [Examination Reference C6].</p> <p>The site-specific policy includes requirements to provide green infrastructure, retention of hedgerows and trees, provide open space and landscaping that maximises connectivity with the inclusion of biodiversity improvements and enhancements to existing key features such as the Beckett's Plantation.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC327
Response Date	17/12/2024 12:24:00
Full Name	Barbara & Paul Cooper
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>The proposals for the use of these arable farmland fields and the surrounding small roads for such a huge residential development are quite ludicrous.</p> <p>These small roads are already busy especially during the visitors seasons, which covers most of the year these days.</p> <p>All traffic would have to come in from Roughton Road or Carr Lane, the Felbrigg junction is already perilous at any time of the year. Roughton Road would become a rat run down to Cromer town coming from the Norwich Road.</p> <p>Traffic aside, this area is an AONB and has an enormous amount of biodiversity and many animals, birds, bat and owl species use its field margins and habitat.</p> <p>A cut through Cycle/walking path is also proposed into Burnt Hill where we live, this is a very small road never meant to be used for this purpose and I understand that the bungalow adjoining one of the fields proposed for housing has been purchased by the same land owner, it remains un lived in and in a state of disrepair although the sale price was well above the market value, which strongly suggests that a possible road through here is in the developers mind going forward. This would be completely unfair to us residents who purchased our homes with a no through road peaceful location for our retirements.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: The proposals for the use of these arable farmland fields and the surrounding small roads for such a huge residential development are quite ludicrous. These small roads are

	<p>already busy especially during the visitors seasons, which covers most of the year these days.</p> <p>All traffic would have to come in from Roughton Road or Carr Lane, the Felbrigg junction is already perilous at any time of the year. Roughton Road would become a rat run down to Cromer town coming from the Norwich Road. AONB and has an enormous amount of biodiversity and many animals, birds, bat and owl species use its field margins and habitat.</p>
Officer Response	<p>Comments noted. The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of agricultural land would prevent the level of growth needed as identified in the Local Plan, the Council has a Brownfield Register however, there are not enough sites on this register to accommodate the required growth needed as set out in Policy SS1 and many potential brownfield sites are unsuitable due to location or other constraints.</p> <p>The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and as a result of discussions relating to this consultation, the Highways Authority confirmed that vehicular access onto Roughton Road from either C22/4 or C19/2 is unsuitable and not supported.</p> <p>The site-specific policy includes mitigation requirements to offset the site's potential impact on the National Landscape. The Council provided a detailed response to the need to provide growth within the National Landscape and this is set out in the Council's Matter 5 Statement (EH011(a)(i)). A detailed site-specific assessment of the site's impact on the National Landscape is available to view in the Additional Sites Review Background Paper Appendix 1, the conclusion of which is that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC347
Response Date	18/12/2024 22:33:35
Full Name	E Johnson
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I wish to object to the proposed change on the basis that it will negatively impact the area around Roughton Road which is rural in character. The proposed extension to the site further encroaches into Roughton and will completely change the character of the area in every way imaginable from loss of farmland, to noise pollution, to light pollution to increased traffic in the area. There is no way a development of this scale should come anywhere close to Roughton Road and yet the proposal seeks to actively link the extended site to Roughton Road. There is no justification for this link as pedestrians accessing Roughton Road would join a very narrow rural road where the speed limit is 60, with no pavements and no lighting.</p> <p>From the proposed plan, the only justification for the extended site to graze Roughton Road and provide access to nothing would seem to be potential further development, which would completely destroy the rural area. Traffic already 'rat runs' down Carr Lane and this will only get worse as the new residents take one look at the queues down Norwich Road, especially in the Summer, and decide to use the back way into Cromer down Roughton Road, which is completely unsuitable for such an increased volume of traffic. The hedgerows along Roughton Road must be protected and preserved, unfortunately from the plan the extension to the site puts the hedgerows in jeopardy with all of the associated risks to the rich local wildlife the area has. An early morning stroll in the area reveals a plethora of wildlife including deer and pheasants. Extending the site along Roughton Road will destroy this rich wildlife, there have to be more appropriate areas for sports pitches and homes. As for new residents using public transport or walking and cycling into town, I feel they will be more likely to drive into Cromer and the town just cannot cope with the increased number of vehicles the site will generate, especially in the Summer months. In my opinion, the proposed site extension is nothing more than a convenience and makes what is already an unsound plan deeply detrimental to all the existing residents and the wildlife. Further, I believe the extended site plan has been specifically designed to potentially open up the rest of the land to development. The extended</p>

	site risks Roughton being swallowed up by 'Greater Cromer' and losing its' rural character, which is one of the great appeals to visitors to the area.
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: I wish to object to the proposed change on the basis that it will negatively impact the area around Roughton Road which is rural in character. The proposed extension to the site further encroaches into Roughton and will completely change the character of the area in every way imaginable from loss of farmland, to noise pollution, to light pollution to increased traffic in the area. There is no way a development of this scale should come anywhere close to Roughton Road and yet the proposal seeks to actively link the extended site to Roughton Road.</p> <p>Traffic already 'rat runs' down Carr Lane and this will only get worse as the new residents take one look at the queues down Norwich Road, especially in the Summer, and decide to use the back way into Cromer down Roughton Road, which is completely unsuitable for such an increased volume of traffic.</p> <p>he hedgerows along Roughton Road must be protected and preserved, unfortunately from the plan the extension to the site puts the hedgerows in jeopardy with all of the associated risks to the rich local wildlife the area has. Further, I believe the extended site plan has been specifically designed to potentially open up the rest of the land to development.</p>
Officer Response	<p>Comments noted. The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole which has resulted in the requirement within the site-specific policy to provide a Transport Assessment that includes the analysis of the development's impact on the local road network, including during construction periods, and identify any potential mitigation solutions as required. The Highway Authority confirmed that vehicular access onto Roughton Road from either C22/4 or C19/2 is unsuitable and not supported and the site-specific policy makes not provision for vehicular access onto Roughton Road.</p> <p>The site-specific also requires the retention and enhancement of hedgerows and trees around and within the site and includes the protection of existing woodland within the site as well.</p> <p>The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC360
Response Date	17/12/2024 14:46:00
Full Name	David Miles
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I would like to comment and object to the proposed plan as follows.</p> <p>I am greatly concerned about what would be a huge increased level of traffic. I presume Highways have some due concerns. The amount of traffic already along Roughton Road is heavy. It currently takes a regular scheduled bus route, 6A, heavy farm equipment, plus it is often used as a seasonal cut through during the Summer to avoid the congestion in Cromer. Another point is that existing areas of Roughton Road are particularly narrow where one has to give way as there is insufficient room for two vehicle to pass safely. There is also the regular use of Carr Lane as a 'rat run'.</p> <p>As an aside I presume some thought has gone into the increased volume and pressure that would be placed on the Public Services, e.g. Doctors, Dentists, Schooling, Car Parking etc.</p>

Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: I am greatly concerned about what would be a huge increased level of traffic. I presume Highways have some due concerns. The amount of traffic already along Roughton Road is heavy. Another point is that existing areas of Roughton Road are particularly narrow where one has to give way as there is insufficient room for two vehicle to pass safely. There is also the regular use of Carr Lane as a 'rat run'. As an aside I presume some thought has gone into the increased volume and pressure that would be placed on the Public Services, e.g. Doctors, Dentists, Schooling, Car Parking etc.
Officer Response	Comments noted. The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and as a result of discussions relating to this consultation, the Highways Authority confirmed that vehicular access onto Roughton Road from either C22/4 or C19/2 is unsuitable and not supported. The site-specific policy requires the provision of a Transport Assessment that includes the analysis of the development's impact on the local road network, including during construction periods, and identify any potential mitigation solutions as required.
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC369
Response Date	18/12/2024 08:45:00
Full Name	Mrs D Evans
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I understand this proposal would link the Roughton Road and Norwich Road by further land development. I object to this proposal on a number of fronts as follows:</p> <ol style="list-style-type: none"> 1 Increase in traffic on the Roughton Road, which has a sharp narrow bend at the Roughton end, and a junction very near to a roundabout at the Cromer end. It is already difficult to move out of the road at either end, particularly during summer months without adding further traffic. Exiting my drive is already difficult with the amount of traffic which does not abide by the 30 mph speed limit. 1 Residents already have problems with water pressure in the area and any potential development would exacerbate this without improvements to the basic water and sewerage infrastructure. 1 Our current Doctor's surgery cannot cope with the existing number of residents, with no plans for expansion. 1 As point 3 above concerning school provision. <p>Detailed plans for this site were submitted within the last 5 years and were refused; I can see no reason that decision would have a basis to be overturned.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: Increase in traffic on the Roughton Road, which has a sharp narrow bend at the Roughton end, and a junction very near to a roundabout at the Cromer end. It is already difficult to move out of the road at either end, particularly during summer months without

	<p>adding further traffic. Exiting my drive is already difficult with the amount of traffic which does not abide by the 30 mph speed limit.</p> <p>Residents already have problems with water pressure in the area and any potential development would exacerbate this without improvements to the basic water and sewerage infrastructure.</p> <p>Our current Doctor's surgery cannot cope with the existing number of residents, with no plans for expansion.</p> <p>Detailed plans for this site were submitted within the last 5 years and were refused; I can see no reason that decision would have a basis to be overturned.</p>
Officer Response	<p>Comments noted. The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and as a result of discussions relating to this consultation, the Highways Authority confirmed that vehicular access onto Roughton Road from either C22/4 or C19/2 is unsuitable and not supported. The site-specific policy does not include vehicular access onto Roughton Road.</p> <p>The site-specific policy includes requirements to the implementation of a surface water management plan that ensures there is no adverse effects on European sites and greenfield run-off rates are not increased. This is in addition to other requirements in the policy that require a foul drainage strategy to be undertaken and the provision of enhancements to sewerage infrastructure prior to the first occupation of any dwellings.</p> <p>The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning in Health Protocol. The protocol presents a process describing how relevant NHS organisations, Norfolk & Suffolk County Councils, Public Health and the Norfolk and East Suffolk Local Planning Authorities jointly engage to ensure that health considerations are adequately accounted for in plan making and in planning applications and their subsequent developments so that the appropriate authorities can plan and priorities investment(s).</p> <p>PO/18/1551 related to application for a scheme partly situated on land within C22/4 and C19/2. The application was withdrawn and is not related to this consultation which is seeking comments pertaining to the site's suitability as an allocation, not the details of a previous application.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC392
Response Date	18/12/2024 15:07:00
Full Name	Mrs P Allard
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I object to the proposed Local Plan amendments extending the Roughton Road development site. These amendments raise serious concerns regarding traffic, future development, and the impact on the Norfolk Coast Protected Landscape.</p> <p>Extending the site to Roughton Road in two locations risks creating a cut-through road network, worsening existing traffic problems. Norfolk County Highways has deemed Mill Lane, Roughton Road, and Carr Lane unsuitable for increased traffic, which this development will inevitably generate.</p> <p>This extension also enables further development off Roughton Road, allowing expansion in what is an unsuitable location.</p> <p>Critically, the extension threatens the Norfolk Coast AONB's wildlife and habitats. Habitat loss, including vital field margins, will harm biodiversity and endangered species. Increased human activity will further disrupt the ecological balance. Preserving this landscape must outweigh short-term development gains.</p> <p>The proposed development will also negatively alter the settlement's character. A large-scale housing estate will disrupt the area's visual coherence and distinctive identity. Its scale and design will clash with historic buildings and street patterns, diminishing the sense of place and residents' quality of life.</p> <p>I urge the planning inspector and council to reject these amendments and prioritise preserving this valuable landscape and community safety over expansion in this area.</p>
Do you consider it necessary to participate in a public hearing	

session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: These amendments raise serious concerns regarding traffic, future development, and the impact on the Norfolk Coast Protected Landscape. Extending the site to Roughton Road in two locations risks creating a cut-through road network, worsening existing traffic problems. Norfolk County Highways has deemed Mill Lane, Roughton Road, and Carr Lane unsuitable for increased traffic, which this development will inevitably generate.</p> <p>Critically, the extension threatens the Norfolk Coast AONB's wildlife and habitats. Habitat loss, including vital field margins, will harm biodiversity and endangered species. Increased human activity will further disrupt the ecological balance. Preserving this landscape must outweigh short-term development gains.</p> <p>The proposed development will also negatively alter the settlement's character. A large-scale housing estate will disrupt the area's visual coherence and distinctive identity. Its scale and design will clash with historic buildings and street patterns, diminishing the sense of place and residents' quality of life.</p>
Officer Response	<p>Comments noted. The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole which has resulted in the requirement within the site-specific policy to provide a Transport Assessment that includes the analysis of the development's impact on the local road network, including during construction periods, and identify any potential mitigation solutions as required. The Highways Authority confirmed that vehicular access onto Roughton Road from either C22/4 or C19/2 is unsuitable and not supported therefore, the site-specific policy does not include provision of vehicular access onto Roughton Road.</p> <p>The site-specific policy includes requirements to provide green infrastructure, retention of hedgerows and trees, provide open space and landscaping that maximises connectivity with the inclusion of biodiversity improvements and enhancements to existing key features such as the Beckett's Plantation. The site-specific policy includes mitigation requirements to offset the site's potential impact on the National Landscape. The Council provided a detailed response to the need to provide growth within the National Landscape and this is set out in the Council's Matter 5 Statement (EH011(a)(i)). A detailed site-specific assessment of the site's impact on the National Landscape is available to view in the Additional Sites Review Background Paper Appendix 1, the conclusion of which is that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape.</p> <p>The site-specific policy includes requirements for the site to be designed in such a way that it pays careful attention to the site's layout, building heights and materials used. The exact masterplanning for the site will be explored and consulted on through the application process. Furthermore, the site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan, including Policy ENV 8 - High Quality Design.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC393
Response Date	18/12/2024 15:11:00
Full Name	Mrs Cindy McCann
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am writing to formally object to the proposed amendments to the Local Plan, specifically concerning the development site extending to Roughton Road. I believe these amendments raise serious concerns regarding traffic, future development potential, and the impact on the Norfolk Coast Protected Landscape (AONB).</p> <p>The proposed amendment extends the development site to Roughton Road in two locations. This raises significant concerns about the potential for a cut-through road network, which</p>

	<p>would exacerbate existing traffic issues. Norfolk County Highways has already identified Mill Lane, Roughton Road, and Carr Lane as unsuitable for increased traffic volumes. The proposed development would inevitably lead to a substantial rise in traffic, further compromising the safety and usability of these roads.</p> <p>Furthermore, the proposed extension creates the potential for further development off Roughton Road in the future. This opens the door to uncontrolled expansion and the associated negative consequences. This potential for future development is a serious concern and must be addressed.</p> <p>Critically, the proposed extension poses a significant threat to the Norfolk Coast Protected Landscape, a designated Area of Outstanding Natural Beauty. This area is renowned for its diverse wildlife and habitats. The development would result in the loss of natural habitats, including crucial field margins, which are essential for biodiversity. This loss would have a detrimental impact on flowers and plants as well as the insects and animals. The increased human activity and disturbance associated with the development would further disrupt the delicate ecological balance, potentially leading to a decline in vital plant and animal populations. The preservation of this unique landscape must be prioritised over short-term development gains.</p> <p>The proposed development would also significantly and negatively alter the existing character of the settlement. The introduction of a large-scale housing estate would disrupt the visual and spatial coherence of the area, resulting in a loss of its distinctive identity. The scale and design of the development would be incompatible with the surrounding historic buildings and traditional street patterns, diminishing the sense of place and negatively impacting the quality of life for residents.</p> <p>In summary, I strongly object to the proposed amendments to the Local Plan. The potential for increased traffic congestion on unsuitable roads, the risk of further uncontrolled development, and the significant threat to the Norfolk Coast Protected Landscape and the local character of the area are unacceptable. I urge the council to reject these amendments and prioritise the preservation of this valuable landscape and community.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>I am writing to formally object to the proposed amendments to the Local Plan, specifically concerning the development site extending to Roughton Road. I believe these amendments raise serious concerns regarding traffic, future development potential, and the impact on the Norfolk Coast Protected Landscape (AONB).</p> <p>The proposed amendment extends the development site to Roughton Road in two locations. This raises significant concerns about the potential for a cut-through road network, which would exacerbate existing traffic issues. Norfolk County Highways has already identified Mill Lane, Roughton Road, and Carr Lane as unsuitable for increased traffic volumes. The proposed development would inevitably lead to a substantial rise in traffic, further compromising the safety and usability of these roads.</p> <p>Critically, the proposed extension poses a significant threat to the Norfolk Coast Protected Landscape, a designated Area of Outstanding Natural Beauty. This area is renowned for its diverse wildlife and habitats. The development would result in the loss of natural habitats, including crucial field margins, which are essential for biodiversity. This loss would have a detrimental impact on flowers and plants as well as the insects and animals. The increased human activity and disturbance associated with the development would further disrupt the delicate ecological balance, potentially leading to a decline in vital plant and animal populations. The preservation of this unique landscape must be prioritised over short-term development gains.</p> <p>The proposed development would also significantly and negatively alter the existing character of the settlement. The scale and design of the development would be incompatible with the surrounding historic buildings and traditional street patterns, diminishing the sense of place and negatively impacting the quality of life for residents.</p> <p>In summary, I strongly object to the proposed amendments to the Local Plan.</p>
<p>Officer Response</p>	<p>Comments noted. The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and as a</p>

	<p>result of discussions relating to this consultation, the Highway Authority confirmed that vehicular access onto Roughton Road from either C22/4 or C19/2 is unsuitable and not supported and no vehicular access is proposed onto Roughton Road within the site-specific policy. The site-specific policy also includes a provision for a Transport Assessment that includes the analysis of the development's impact on the local road network, including during construction periods, and identify any potential mitigation solutions as required.</p> <p>The site-specific policy includes mitigation requirements to offset the site's potential impact on the National Landscape. The Council provided a detailed response to the need to provide growth within the National Landscape and this is set out in the Council's Matter 5 Statement (EH011(a)(i)). A detailed site-specific assessment of the site's impact on the National Landscape is available to view in the Additional Sites Review Background Paper Appendix 1, the conclusion of which is that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape.</p> <p>The site-specific policy includes requirements for the site to be designed in such a way that it pays careful attention to the site's layout, building heights and materials used. The exact masterplanning for the site will be explored and consulted on through the application process. Furthermore, the site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan, including Policy ENV 8 - High Quality Design.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC394
Response Date	18/12/2024 15:15:00
Full Name	Mr William Horner
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I suggest that this plan is unsound and not positively prepared for the reasons below.</p> <p>{i} The infrastructure of Cromer cannot support development of this size, getting a doctor's or dentists appointment in Cromer is already an exercise in futility and frustration plus the education authority has given no firm commitment that it can handle extra growth. No provision for improvement to these vital services has been guaranteed to cope with this extra demand.</p> <p>{ii} Cromer depends upon the tourist economy, many already decide not to return to Cromer because of the extremely long time it takes during the tourist season to access its delights. The development of C22/4 would inevitably increase traffic congestion and further drive away the tourists upon which Cromer depends. To alleviate this problem an alternative would be for all or some of C22/4 to be transplanted to Sheringham which has not been included in this Local Plan. Sheringham does not experience the traffic problems that Cromer does and has sites available such as areas around Church Lane and St Austin's Grove that could absorb development.</p> <p>{iii} Page 9 paragraph 2.2.5. mentions water and sewage requirements for C22/4. Guarantees that Anglian Water can meet such needs should be in place before any development.</p> <p>{iv} Page 9 paragraph 2.2.5. mentions "safe pedestrian routes" to C22/4. The density of the site plus the sports pitches will ensure heavy footfall across the railway bridge leading to the site. Any footpath around this obstacle will present opportunities for accidents on this very busy road. A safer alternative to reduce footfall would be to place the sports pitches on C10/1 which has an existing footpath almost up to its entrance and is much more accessible to Cromer inhabitants.</p> <p>{v} Cromer's already strained infrastructure is not prepared for this size of development. Norwich has an infrastructure that could readily absorb this development of C22/4 on its brown field sites. Moving this development here would safeguard the future of some 40 plus hectares of fertile agricultural land within The Norfolk Coast National Landscape which would be lost if C22/4 proceeds. Agreements with other Local Authorities (which may soon be merged) should be sought to achieve this.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No

If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: The infrastructure of Cromer cannot support development of this size, getting a doctor's or dentists appointment in Cromer is already an exercise in futility and frustration plus the education authority has given no firm commitment that it can handle extra growth.</p> <p>The development of C22/4 would inevitably increase traffic congestion and further drive away the tourists upon which Cromer depends. To alleviate this problem an alternative would be for all or some of C22/4 to be transplanted to Sheringham which has not been included in this Local Plan. Sheringham does not experience the traffic problems that Cromer does and has sites available such as areas around Church Lane and St Austin's Grove that could absorb development.</p> <p>paragraph 2.2.5. mentions "safe pedestrian routes" to C22/4. The density of the site plus the sports pitches will ensure heavy footfall across the railway bridge leading to the site. Any footpath around this obstacle will present opportunities for accidents on this very busy road. A safer alternative to reduce footfall would be to place the sports pitches on C10/1 which has an existing footpath almost up to its entrance and is much more accessible to Cromer inhabitants.</p> <p>Norwich has an infrastructure that could readily absorb this development of C22/4 on its brown field sites. Moving this development here would safeguard the future of some 40 plus hectares of fertile agricultural land within The Norfolk Coast National Landscape which would be lost if C22/4 proceeds. Agreements with other Local Authorities (which may soon be merged) should be sought to achieve this.</p>
Officer Response	<p>The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p> <p>The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole which has resulted in the requirement within the site-specific policy to provide a Transport Assessment that includes the analysis of the development's impact on the local road network, including during construction periods, and identify any potential mitigation solutions as required.</p> <p>Sheringham is identified as a Small Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1, a number of allocations for the Local Plan have already been identified in this location. The review of additional sites as expressed within the Additional Sites Review Background Paper did not identify any suitable options within Sheringham beyond the existing allocations.</p> <p>The site-specific policy for C22/4 includes requirements to retain and upgrade the existing public footpath to a surfaced route with the additional provision of a new route which connects to Roughton Road. This will provide a more sustainable means of connectivity that encourages active travel between the site and services and facilities located on Roughton Road.</p> <p>The location and quantum of sports pitch provision will be explored further through the application process and in accordance with the relevant policies in the Local Plan. The site-specific policy includes requirements to create and enhance connectivity throughout the site and Policy ENV 8 - High Quality Design includes reference to the need for safety considerations in design.</p> <p>Throughout the Local Plan process the Council has engaged with all relevant neighbouring authorities in regard to Local Plan growth and cross boundary related issues. Norwich is not within the district of North-Norfolk and both authority areas should meet the housing targets identified in their respective Plans within their own authority boundaries.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC396
Response Date	18/12/2024 15:19:00
Full Name	Mrs K Stone
Organisation	

Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I object to the proposed Local Plan amendments extending the Roughton Road development. This extension raises serious concerns about traffic, further development, and the impact on the Norfolk Coast Protected Landscape .</p> <p>Extending the site to Roughton Road risks creating a cut-through, worsening existing traffic problems on unsuitable roads (Mill Lane, Roughton Road, and Carr Lane). It also enables uncontrolled expansion off Roughton Road.</p> <p>Critically, this extension threatens the wildlife and habitats. Habitat loss will harm biodiversity and endangered species as well as the flora and fauna. Increased human activity will further disrupt the ecological balance. Preserving this landscape must be prioritised.</p> <p>The development will also negatively alter the settlement's character. A large housing estate will disrupt the area's visual coherence and clash with existing buildings, diminishing the sense of place and residents' quality of life.</p> <p>I urge the council and the planning inspector to reject this amendment and prioritise preserving this valuable landscape and community.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: This extension raises serious concerns about traffic, further development, and the impact on the Norfolk Coast Protected Landscape. Extending the site to Roughton Road risks creating a cut-through, worsening existing traffic problems on unsuitable roads (Mill Lane, Roughton Road, and Carr Lane). It also enables uncontrolled expansion off Roughton Road.</p> <p>Critically, this extension threatens the wildlife and habitats. Habitat loss will harm biodiversity and endangered species as well as the flora and fauna. Increased human activity will further disrupt the ecological balance. Preserving this landscape must be prioritised. The development will also negatively alter the settlement's character. A large housing estate will disrupt the area's visual coherence and clash with existing buildings, diminishing the sense of place and residents' quality of life.</p>
Officer Response	<p>Comments noted. The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole which has resulted in the requirement within the site-specific policy to provide a Transport Assessment that includes the analysis of the development's impact on the local road network, including during construction periods, and identify any potential mitigation solutions as required. The Highways Authority confirmed that vehicular access onto Roughton Road from either C22/4 or C19/2 is unsuitable and not supported therefore, the site-specific policy does not include vehicular access onto Roughton Road.</p> <p>The site-specific policy includes requirements to provide green infrastructure, retention of hedgerows and trees, provide open space and landscaping that maximises connectivity with the inclusion of biodiversity improvements and enhancements to existing key features such as the Beckett's Plantation. Additionally,</p> <p>The site-specific policy includes requirements for the site to be designed in such a way that it pays careful attention to the site's layout, building heights and materials used. The exact masterplanning for the site will be explored and consulted on through the application process. Furthermore, the site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan, including Policy ENV 8 - High Quality Design.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC398
Response Date	18/12/2024 12:57:00
Full Name	Michael Flower
Organisation	
Agent Full Name	

Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>On behalf of my family please note that we object to the proposed development and to any extension of the scope of it. The grounds for this objection are</p> <ul style="list-style-type: none"> • The proposed development does not address the basic lack of infrastructure in the Cromer area. For example, there is only one GP practice which is causing significant delays in appointment booking, there has been no or little increase in school capacity, there is no dentist accepting NHS patients,, the local hospital is inadequate for local needs necessitating travel to Norwich. • In short, the area cannot cope with a further increase in population. • There are concerns about the proposed development due to the impact on the natural habitat and on the diverse species of wildlife that the habitat supports. • Traffic is already overwhelming local roads and I am led to understand that Norfolk CC Highways have already indicated that the roads in the area concerned are not suitable for increased traffic. • While the need for more housing is accepted the Government suggests that brownfield sites ought to be subject to development as a priority and that local government should address disused, and empty, properties with similar priority. • It is wrong in principle that developers are being allowed to build for maximum profit rather than providing genuinely affordable housing which actually meets the needs of persons who can be categorised as, and who are, already local residents.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: The proposed development does not address the basic lack of infrastructure in the Cromer area. For example, there is only one GP practice which is causing significant delays in appointment booking. In short, the area cannot cope with a further increase in population.</p> <p>There are concerns about the proposed development due to the impact on the natural habitat and on the diverse species of wildlife that the habitat supports.</p> <p>Traffic is already overwhelming local roads and I am led to understand that Norfolk CC Highways have already indicated that the roads in the area concerned are not suitable for increased traffic.</p> <p>While the need for more housing is accepted the Government suggests that brownfield sites ought to be subject to development as a priority and that local government should address disused, and empty, properties with similar priority. It is wrong in principle that developers are being allowed to build for maximum profit rather than providing genuinely affordable housing which actually meets the needs of persons who can be categorised as, and who are, already local residents.</p>
Officer Response	<p>Comments noted. The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning in Health Protocol. The protocol presents a process describing how relevant NHS organisations, Norfolk & Suffolk County Councils, Public Health and the Norfolk and East Suffolk Local Planning Authorities jointly engage to ensure that health considerations are adequately accounted for in plan making and in planning applications and their subsequent developments so that the appropriate authorities can plan and priorities investment(s).</p> <p>The site-specific policy includes requirements to provide green infrastructure, retention of hedgerows and trees, provide open space and landscaping that maximises connectivity with the inclusion of biodiversity improvements and enhancements to existing key features such as the Beckett's Plantation. The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole which has resulted in the requirement within the site-specific policy to provide a Transport Assessment that includes the analysis of the development's impact on the local road network, including during construction periods, and identify any potential mitigation solutions as required.</p>

	<p>The Highways Authority confirmed that vehicular access onto Roughton Road from either C22/4 or C19/2 is unsuitable and not supported.</p> <p>The Council has a Brownfield Register, there are not enough sites on this register to accommodate the required growth needed as set out in Policy SS1 and many potential brownfield sites are unsuitable due to location or other constraints.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC409
Response Date	18/12/2024 18:43:00
Full Name	Joanna & Bill Miller
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	I am against this proposal for the following reasons:It is in an AONB.There will be a loss of wildlife, there are endangered species living there. We also regularly see foxes, hares, deer, this would be a devastating loss.Our quality of life would be negatively impacted by this.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: It is in an AONB. There will be a loss of wildlife, there are endangered species living there. We also regularly see foxes, hares, deer, this would be a devastating loss. Our quality of life would be negatively impacted by this.
Officer Response	<p>Comments noted. The site-specific policy includes mitigation requirements to offset the site's potential impact on the National Landscape. The Council provided a detailed response to the need to provide growth within the National Landscape and this is set out in the Council's Matter 5 Statement (EH011(a)(i). A detailed site-specific assessment of the site's impact on the National Landscape is available to view in the Additional Sites Review Background Paper Appendix 1, the conclusion of which is that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape.</p> <p>The site-specific policy includes requirements to provide green infrastructure, retention of hedgerows and trees, provide open space and landscaping that maximises connectivity with the inclusion of biodiversity improvements and enhancements to existing key features such as the Beckett's Plantation.</p> <p>The site-specific policy includes requirements for the site to be designed in such a way that it pays careful attention to the site's layout, building heights and materials used. The exact masterplanning for the site will be explored and consulted on through the application process. Furthermore, the site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan, including Policy ENV 8 - High Quality Design.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC414
Response Date	18/12/2024 20:28:56
Full Name	David Shipstone
Organisation	
Agent Full Name	

Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I object to this proposal as Cromer does not have the infrastructure to cope with this number of new residents.</p> <p>In fact with regard to hospitals, doctors and dentists, the area is already sadly lacking.</p> <p>I have seen no evidence that these issues are being addressed, therefore this proposal is absurd.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: Cromer does not have the infrastructure to cope with this number of new residents.</p> <p>In fact with regard to hospitals, doctors and dentists, the area is already sadly lacking.</p>
Officer Response	<p>Comments noted. The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning in Health Protocol. The protocol presents a process describing how relevant NHS organisations, Norfolk & Suffolk County Councils, Public Health and the Norfolk and East Suffolk Local Planning Authorities jointly engage to ensure that health considerations are adequately accounted for in plan making and in planning applications and their subsequent developments so that the appropriate authorities can plan and priorities investment(s). Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC416
Response Date	18/12/2024 21:27:12
Full Name	Mr Douglas King
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>No I do not believe the proposed changes to this site C22/4 contribute to the soundness of the Plan. The existing proposed allocation C22/2 is already sufficient in the context of the local area and the proposed extension appears excessive and to me suggests before long the boundary will be extended further to Jonas Farm Barns.</p> <p>we live in an AONB and this will significantly detract from the area. Site C22/2 is already expected / outlined to deliver 500 dwellings.</p> <p>Roughton Road is already used as a cut through to Felbrigg Road and via Carr Lane to Norwich Road and this would only add to the traffic. The road between Jonas Farm Barns and Cromer requires a footpath to make it safe for pedestrians who walk between Roughton and Cromer. The speed limit should also be reduced. These should be considered as part of the local plan and the site allocation as part of any s106 obligations.</p> <p>Overall, I consider the extension of C22/4 excessive and damaging to an AONB.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: The existing proposed allocation C22/2 is already sufficient in the context of the local area and the proposed extension appears excessive and to me suggests before long the</p>

	<p>boundary will be extended further. we live in an AONB and this will significantly detract from the area.</p> <p>Roughton Road is already used as a cut through to Felbrigg Road and via Carr Lane to Norwich Road and this would only add to the traffic. The road between Jonas Farm Barns and Cromer requires a footpath to make it safe for pedestrians who walk between Roughton and Cromer. The speed limit should also be reduced. These should be considered as part of the local plan and the site allocation as part of any s106 obligations.</p> <p>Overall, I consider the extension of C22/4 excessive and damaging to an AONB.</p>
Officer Response	<p>Comments noted. The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. The Inspector's response to the Local Plan (July 2024 EH006(f)) states the submitted Plan has a shortfall of housing provision and the Council are seeking to provide additional allocations to help mitigate this shortfall and meet the revised objectively assessed needs.</p> <p>The site-specific policy includes mitigation requirements to offset the site's potential impact on the National Landscape. The Council provided a detailed response to the need to provide growth within the National Landscape and this is set out in the Council's Matter 5 Statement (EH011(a)(i)). A detailed site-specific assessment of the site's impact on the National Landscape is available to view in the Additional Sites Review Background Paper Appendix 1, the conclusion of which is that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape.</p> <p>The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole which has resulted in the requirement within the site-specific policy to provide a Transport Assessment that includes the analysis of the development's impact on the local road network, including during construction periods, and identify any potential mitigation solutions as required. The Highways Authority confirmed that vehicular access onto Roughton Road from either C22/4 or C19/2 is unsuitable and not supported therefore, the site-specific policy does not include access onto Roughton Road.</p> <p>The site-specific policy for C22/4 does however, include requirements to retain and upgrade the existing public footpath to a surfaced route with the additional provision or a new route which connects to Roughton Road. This will provide a more sustainable means of connectivity that encourages active travel between the site and services and facilities located on Roughton Road.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC429
Response Date	18/12/2024 22:05:00
Full Name	Ms Angela Carpenter
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I write to express my view regarding the proposed extended site allocation relating to land west of Pine Tree Farm (C22/4) Extended Site Allocation.</p> <ul style="list-style-type: none"> The parcel of land, in its entirety as well as the extended allocation, is prime arable land. It is tilled, farmed and maintained and provides much-needed workable, drained and fertile land for yearly and often twice-yearly crop rotation. With such a valuable natural asset disappearing at an alarming rate and a crying need for the UK to self-produce food to reduce our carbon footprint and reliance on expensive and sometimes scarce imports, surely it is a priority to preserve this land and reserve for its intended purpose? The entire site plus the beautiful natural haven of Beckett's Wood provides important habitat for a vast and diverse selection of wildlife. The area is classified as an AONB and hosts enormous amounts of biodiversity including multiple species of owl, hares, birds (including garden species such as long tailed tits, coal, great and blue tits, siskin, fieldfare, bramblings, sparrows, chaffinch and bullfinch, jays, plus birds of prey including families of buzzard, hawk and kestrel). To jeopardise all of this when there are more

practical and sensible options readily available to support a housing development will be nothing short of immoral, callous and irresponsible.

- The roads in and around Cromer are already at breaking point, not just during holiday season but year-round. Roughton Road, Carr Lane and the perilous Felbrigg junction are often hazardous due to increased traffic. To add to this by providing additional routes to the proposed extension at points A and B outlined on the map will create a network of rat runs between the town centre, outlying residential areas and the network to Norwich, North Walsham, Mundesley and Holt etc. The local roads are far too narrow to support the current peak-time traffic flow, and to add to this congestion will be awful for residents and visitors. Road development will also sacrifice another valuable habitat, this being hedgerows.
- Burnt Hills is a quiet, peaceful cul-de-sac development. People who purchased homes in this area did so believing they had found a home with minimal traffic and certainly not on a through-route. The owner of the proposed development land has purchased the bungalow sited at the far-end of Burnt Hills, alongside the railway. This bungalow has been empty for a number of years and it is in the public domain that the landowner was able to purchase this property unchallenged and despite it being in a state of disrepair, purchased it at a highly inflated price well above market value and exceeding the ceiling price for the area. This transaction would suggest that the landowner purchased the property for the express purpose of demolishing it to create an access point to their land. If this is allowed to happen it will turn Burnt Hills into a through route from a cul-de-sac, and NONE of us would have envisaged this being allowed to happen. It SHOULDN'T be allowed to happen! The Burnt Hills loop road is very narrow and simply not built to host traffic flow other than for residents travelling to and from their homes. Through traffic will be highly disruptive and dangerous, and our wellbeing and quality of life seriously threatened.
- A development of this size and scale will dwarf Burnt Hills and other adjoining areas well beyond what could be considered reasonable. The land itself is elevated, resulting in Burnt Hills being overwhelmed, overshadowed and overlooked. Bungalows on the boundary line of the land will completely lose 100% of their privacy and security. It would also significantly reduce their value and future saleability. To summarise, being completely overlooked, robbed of any outlook, overwhelmed with a heavy traffic flow and footfall, lives will be made a complete misery.
- It is fact that when larger developments are underway and completed, the London Borough councils negotiate with those governing developments such as this to offset their own burgeoning housing shortages by relocating those on their waiting lists to these provincial areas. It is also proven fact that these developments then experience rapid increases in serious crime, unforeseen overcrowding, and a ghetto mentality within them. This has already happened in areas such as Clacton-On-Sea, Skegness and Humberside, and councils such as the London Boroughs of Camden and Haringey advertising on billboards for local people to leave London and move to these new developments. Cromer is bereft of employment opportunities, public transport is scant, shops are closing weekly with larger retailers leaving in droves, the GP surgery and hospital simply cannot cope, and schools are struggling with reduced budgets and opportunities for students (particularly in terms of CEIAG and the curriculum and the now-mandatory career and work experience opportunities).
- Such a vast development in an area possessing a colourful and important selection of Listed Buildings, characterful architecture and a distinct identity will completely destroy everything that is unique and attractive for residents and visitors. This will be yet another nail in the coffin of a traditional seaside town, and the health, wellbeing and quality of life of its residents.

Do you consider it necessary to participate in a public hearing session, should these be required?

If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:

File (where submitted)

Officer Summary

Object: The parcel of land, in its entirety as well as the extended allocation, is prime arable land. It is tilled, farmed and maintained and provides much-needed workable, drained and fertile land for yearly and often twice-yearly crop rotation.

The entire site plus the beautiful natural haven of Beckett's Wood provides important habitat for a vast and diverse selection of wildlife. The area is classified as an AONB and hosts enormous amounts of biodiversity.

	<p>The roads in and around Cromer are already at breaking point, not just during holiday season but year-round. Roughton Road, Carr Lane and the perilous Felbrigg junction are often hazardous due to increased traffic. To add to this by providing additional routes to the proposed extension at points A and B outlined on the map will create a network of rat runs between the town centre, outlying residential areas and the network to Norwich, North Walsham, Mundesley and Holt etc.</p> <p>Burnt Hills is a quiet, peaceful cul-de-sac development. People who purchased homes in this area did so believing they had found a home with minimal traffic and certainly not on a through-route. The owner of the proposed development land has purchased the bungalow sited at the far-end of Burnt Hills. This transaction would suggest that the landowner purchased the property for the express purpose of demolishing it to create an access point to their land. If this is allowed to happen it will turn Burnt Hills into a through route from a cul-de-sac, and NONE of us would have envisaged this being allowed to happen. It SHOULD'N'T be allowed to happen! A development of this size and scale will dwarf Burnt Hills and other adjoining areas well beyond what could be considered reasonable. The land itself is elevated, resulting in Burnt Hills being overwhelmed, overshadowed and overlooked.</p> <p>Cromer is bereft of employment opportunities, public transport is scant, shops are closing weekly with larger retailers leaving in droves, the GP surgery and hospital simply cannot cope, and schools are struggling with reduced budgets and opportunities for students (particularly in terms of CEIAG and the curriculum and the now-mandatory career and work experience opportunities). Such a vast development in an area possessing a colourful and important selection of Listed Buildings, characterful architecture and a distinct identity will completely destroy everything that is unique and attractive for residents and visitors. This will be yet another nail in the coffin of a traditional seaside town, and the health, wellbeing and quality of life of its residents.</p>
<p>Officer Response</p>	<p>Comments noted. The site lies within Grade 2 agricultural land and also Grade 2, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. Cromer is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.</p> <p>The site-specific policy includes mitigation requirements to offset the site's potential impact on the National Landscape. The Council provided a detailed response to the need to provide growth within the National Landscape and this is set out in the Council's Matter 5 Statement (EH011(a)(i)). A detailed site-specific assessment of the site's impact on the National Landscape is available to view in the Additional Sites Review Background Paper Appendix 1, the conclusion of which is that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape.</p> <p>The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole which has resulted in the requirement within the site-specific policy to provide a Transport Assessment that includes the analysis of the development's impact on the local road network, including during construction periods, and identify any potential mitigation solutions as required.</p> <p>The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development that provides employment and recreational opportunities and adequate connectivity links to other locations such as Norwich and North Walsham, identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of agricultural land would prevent the level of growth needed as identified in the Local Plan, the Council has a Brownfield Register however, there are not enough sites on this register to accommodate the required growth needed as set out in Policy SS1 and many potential brownfield sites are unsuitable due to location or other constraints.</p>
<p>Section</p>	<p>Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)</p>

ID	FC434
Response Date	18/12/2024 22:03:00
Full Name	Avril McCann
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I have several concerns about the proposed development:</p> <ol style="list-style-type: none"> 1 Impact on Local Roads and Traffic: The proposed extension would result in increased traffic along Mill Lane, Roughton Road, and Carr Lane, which are not suitable for handling additional traffic volume. Norfolk County Highways has previously acknowledged that these roads lack the infrastructure to accommodate increased vehicular flow. This raises significant safety concerns for residents, pedestrians, and other road users. 2 Environmental Impact on Protected Landscapes: The site lies near the Norfolk Coast Protected Landscape and an Area of Outstanding Natural Beauty (AONB). This area is home to diverse wildlife and habitats that would be severely affected by such a development. Loss of natural habitats, such as field margins, could harm biodiversity, including endangered species like the Norfolk plover and the marsh harrier. Disruption of the ecological balance risks irreversible damage to local plant and animal populations. 3 Loss of Character and Identity of Roughton: The proposed development's scale and design would significantly alter the village's rural character. Introducing a large-scale housing estate is incompatible with the surrounding historic buildings and traditional street patterns, leading to a diminished sense of place. Such development would disrupt the visual and spatial coherence of the settlement, eroding its unique identity. 4 Long-term Development Concerns: If approved, this proposal could pave the way for further unsustainable development off Roughton Road, intensifying the negative impacts mentioned above and exacerbating current infrastructure challenges. <p>In summary, the environmental, infrastructural, and community impacts of the proposed extension are unacceptable. The importance of preserving this area's unique landscape, wildlife, and rural identity must be prioritised over short-term development gains.</p> <p>I respectfully urge you to reject this proposal in the interests of the local community and the environment.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: The proposed extension would result in increased traffic along Mill Lane, Roughton Road, and Carr Lane, which are not suitable for handling additional traffic volume. Norfolk County Highways has previously acknowledged that these roads lack the infrastructure to accommodate increased vehicular flow. This raises significant safety concerns for residents, pedestrians, and other road users.</p> <p>The site lies near the Norfolk Coast Protected Landscape and an Area of Outstanding Natural Beauty (AONB). This area is home to diverse wildlife and habitats that would be severely affected by such a development. The proposed development's scale and design would significantly alter the village's rural character. Introducing a large-scale housing estate is incompatible with the surrounding historic buildings and traditional street patterns, leading to a diminished sense of place. Such development would disrupt the visual and spatial coherence of the settlement, eroding its unique identity.</p> <p>If approved, this proposal could pave the way for further unsustainable development off Roughton Road, intensifying the negative impacts mentioned above and exacerbating current infrastructure challenges. In summary, the environmental, infrastructural, and community impacts of the proposed extension are unacceptable. The importance of preserving this area's unique landscape, wildlife, and rural identity must be prioritised over short-term development gains.</p>

Officer Response	<p>The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole which has resulted in the requirement within the site-specific policy to provide a Transport Assessment that includes the analysis of the development's impact on the local road network, including during construction periods, and identify any potential mitigation solutions as required. The Highway Authority confirmed that vehicular access onto Roughton Road from either C22/4 or C19/2 is unsuitable and not supported therefore, the site-specific policy does not include access onto Roughton Road.</p> <p>The site-specific policy includes mitigation requirements to offset the site's potential impact on the National Landscape. The Council provided a detailed response to the need to provide growth within the National Landscape and this is set out in the Council's Matter 5 Statement (EH011(a)(i)). A detailed site-specific assessment of the site's impact on the National Landscape is available to view in the Additional Sites Review Background Paper Appendix 1, the conclusion of which is that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape.</p> <p>The site-specific policy also includes requirements for the site to be designed in such a way that it pays careful attention to the site's layout, building heights and materials used. The exact masterplanning for the site will be explored and consulted on through the application process. Furthermore, the site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan, including Policy ENV 8 - High Quality Design.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC435
Response Date	18/12/2024 22:27:00
Full Name	John Parr
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am very concerned about the proposed plans to extend the development site in Roughton and Cromer.</p> <p>As a frequent visitor to the area, who has lots of family living nearby, I know that this will hugely impact the beautiful landscape and diverse ecosystem that exists in the area. As part of the North Norfolk Coast Area of Natural Beauty, these plans threaten to endanger said beauty and biodiversity in the area. I myself have spotted a range of wildlife, including rare owls in the area where the plans are set out.</p> <p>I frequently visit the area due to its tranquility and I know that my family who live there love the location because of it's biodiversity and tight-knit community. Extending this development land risks jeopardising both of these aspects in favour of short-term and short-sighted goals.</p> <p>It would not be worth damaging such an amazing area for such goals. I know that my family may have to think more carefully about their long-term plans to settle in the area if the plans were to go ahead. As a frequent tourist to the area, I myself would certainly visit less frequently if I knew that the wonderful countryside were slowly being turned into an ever-expanding development.</p> <p>Going ahead with this work would set a precedent in the area and potentially risk going down a slippery slope towards transforming a fantastic community and distinctive natural area, into somewhere that is constantly expanding development into a faceless and characterless town.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: As part of the North Norfolk Coast Area of Natural Beauty, these plans threaten to endanger said beauty and biodiversity in the area. It would not be worth damaging such an

	<p>amazing area for such goals. I know that my family may have to think more carefully about their long-term plans to settle in the area if the plans were to go ahead. As a frequent tourist to the area, I myself would certainly visit less frequently if I knew that the wonderful countryside were slowly being turned into an ever-expanding development.</p>
Officer Response	<p>Comments noted. The site-specific policy includes mitigation requirements to offset the site's potential impact on the National Landscape. The Council provided a detailed response to the need to provide growth within the National Landscape and this is set out in the Council's Matter 5 Statement (EH011(a)(i)). A detailed site-specific assessment of the site's impact on the National Landscape is available to view in the Additional Sites Review Background Paper Appendix 1, the conclusion of which is that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape.</p> <p>The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC446
Response Date	19/12/2024 10:36:35
Full Name	Mrs Lesley Newell
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>This area is an area of outstanding natural beauty and supports lots of wild life and many species of birds. Building on it and also floodlights for a sports pitch would seriously compromise this. It is also productive agricultural land that is always farmed. Since it is in the parish of Roughton it is not the right place for Cromer football pitches. While access on Norwich Road is reasonable, access from Roughton Road would be highly unsuitable since it is a narrow unlit road without pavements. This area is not convenient for town and would bring a high increase in road traffic; in the summer months this would cause logjams on the roads in and out of Cromer. There is little local employment in the area so would mean much commuting by residents by car, not a green solution.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: This area is an area of outstanding natural beauty and supports lots of wild life and many species of birds. Building on it and also floodlights for a sports pitch would seriously compromise this. It is also productive agricultural land that is always farmed. Since it is in the parish of Roughton it is not the right place for Cromer football pitches. While access on Norwich Road is reasonable, access from Roughton Road would be highly unsuitable since it is a narrow unlit road without pavements. This area is not convenient for town and would bring a high increase in road traffic.</p>
Officer Response	<p>Comments noted. The site-specific policy includes mitigation requirements to offset the site's potential impact on the National Landscape. The Council provided a detailed response to the need to provide growth within the National Landscape and this is set out in the Council's Matter 5 Statement (EH011(a)(i)). A detailed site-specific assessment of the site's impact on the National Landscape is available to view in the Additional Sites Review Background Paper Appendix 1, the conclusion of which is that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is</p>

	<p>broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape.</p> <p>The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development that provides employment and recreational opportunities and adequate connectivity links to other locations such as Norwich and North Walsham, identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of agricultural land would prevent the level of growth needed as identified in the Local Plan.</p> <p>The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and as a result of discussions relating to this consultation, the Highway Authority confirmed that vehicular access onto Roughton Road from either C22/4 or C19/2 is unsuitable and not supported and no vehicular access is proposed onto Roughton Road within the site-specific policy.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC450
Response Date	18/12/2024 19:28:00
Full Name	Selda & David Norgate & Colbourne
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am writing to raise my concerns against the proposed planning for the following areas: The land west of Clifton Park The land south of Cromer</p> <p>My main concerns with the planning proposal for these areas are the following: Loss of biodiversity - yet more land for nature that will be lost and nature is already in crisis. This is an area of national beauty - this should be protected not built upon simply because it is there. Can alternative brown sites be considered? What Infrastructure is in place for this with regards to support this new housing? It is already extremely challenging to get a GP appointment already, there is a shortage of dentists , the hospital services are stretched as well as many other local services and the nearest hospital for A and E is the NNUH where wait times are increasing all the time. Cromer will lose its rural charm - this will greatly impact the tourist industry, especially as the public footpaths and green spaces will be lost Addressing the second home issue would also be beneficial</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: Loss of biodiversity - yet more land for nature that will be lost and nature is already in crisis. This is an area of national beauty - this should be protected not built upon simply because it is there. Can alternative brown sites be considered?</p> <p>What Infrastructure is in place for this with regards to support this new housing? It is already extremely challenging to get a GP appointment already, there is a shortage of dentists , the hospital services are stretched as well as many other local services and the nearest hospital for A and E is the NNUH where wait times are increasing all the time. this will greatly impact the tourist industry, especially as the public footpaths and green spaces will be lost. Addressing the second home issue would also be beneficial</p>
Officer Response	Comments noted. The site-specific policy includes requirements to provide green infrastructure, retention of hedgerows and trees, provide open space and landscaping that maximises

connectivity with the inclusion of biodiversity improvements and enhancements to existing key features such as the Beckett's Plantation.

The site-specific policy includes mitigation requirements to offset the site's potential impact on the National Landscape. The Council provided a detailed response to the need to provide growth within the National Landscape and this is set out in the Council's Matter 5 Statement (EH011(a)(i)). A detailed site-specific assessment of the site's impact on the National Landscape is available to view in the Additional Sites Review Background Paper Appendix 1, the conclusion of which is that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape. The Council has a Brownfield Register, there are not enough sites on this register to accommodate the required growth needed as set out in Policy SS1 and many potential brownfield sites are unsuitable due to location or other constraints.

The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning in Health Protocol. The protocol presents a process describing how relevant NHS organisations, Norfolk & Suffolk County Councils, Public Health and the Norfolk and East Suffolk Local Planning Authorities jointly engage to ensure that health considerations are adequately accounted for in plan making and in planning applications and their subsequent developments so that the appropriate authorities can plan and priorities investment(s). Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability. The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy.

Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC452
Response Date	18/12/2024 19:36:00
Full Name	Mr Stuart Harrison
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTCHED FILE
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	Please make the Inspector aware that I would want to take part in the examination hearings if he is minded to consider this matter in more detail.
File (where submitted)	North Norfolk Local Plan Further Consultation_Harrison_Dec 24.pdf
Officer Summary	<p>Object: I consider the Local Plan Not to be Sound in relation to the recently consulted proposed Site Allocations and in particular: C22/4, Land West of Pine Tree Farm, Cromer (Extension to existing allocation).</p> <p>In essence the approach to the proposed allocation of sites (and wider policies on transport) in the Plan is: a) Not Justified due to the lack of a transport evidence base; b) Not Effective in delivering required transport infrastructure, and c) is Not Consistent with National Policy in relation to promoting sustainable transport. . Furthermore, the policy approach does not set out a coherent strategy for sustainable transport delivery or transport mitigation for site C22.</p>

The Site Allocations in the Plan are not based on a robust and credible evidence base in relation to sustainable transport or the impact of the growth in the District on transport. There is no evidence presented by the Council that the two access points onto Norwich Road are achievable and that such accesses will not have a significant detrimental impact on the highway network. There is some doubt as to whether the roundabout access can be physically delivered. The Site Allocations in the Plan are not based on a robust and credible evidence base in relation to sustainable transport or the impact of the growth in the District on transport.

I note in the Inspectors 'Matters Questions' he asks the following (at 5.1.6 – Standard Questions for each allocation): d) Have the impacts and effects of development been properly taken into account? and i) Are the site-specific requirements for development of the site justified, consistent with national policy and would they be effective? The Council have not provided the evidence to demonstrate that they have adequately addressed these critical questions raised by the Inspector.

The Plan is not Sound as it is not consistent with National Policy. The evidential approach, and in turn, the decision to allocate Site C22 is not consistent with National Policy. It is usual practice for a Local Planning Authority to produce evidence that demonstrates that it has undertaken an appropriate and proportionate assessment of the transport impacts of the strategic sites it is proposing. Transport planning should be the foundation upon which a sound spatial strategy is built and this is reinforced by the NPPF.

the Highway Authority have previously expressed significant concerns over the delivery of transport infrastructure on Site C22: The Highway Authority is of the view that the required highway improvements to enable safe and sustainable development of site reference C22/1 are not deliverable and would therefore wish to object to allocation.

There is no evidence provided by the Council as to the transport impact that these sports pitches will have on the local highway network.

In order to remedy this situation, the Council needs to pause the submission and commission a transport evidence base in the form of a Transport Impact Assessment - similar to the approach taken in St. Albans. Only then, when it has fully considered the evidence in detail, can it move forward with recommendations on proposed strategic allocations which would come with an accompanying highways and sustainable transport mitigation strategy.

The Council, as a bare minimum, need to 'double down' on the policy requirement for the delivery of the active travel route along Norwich Road and not support the site promoter's suggestion that the alternative option is acceptable. A delivery strategy should be produced between the Council, Highway Authority and Site Promoter. If the site promoter cannot deliver the active travel connection along Norwich Road, then Site C22 should not be allocated.

Remaining elements of the attachment make comments regarding the overall Plan's soundness and references events that occurred prior to the previous round of hearing sessions that took place January-March 2024, neither of which are relevant to the proposal this consultation is based on.

Officer Response	<p>Comments noted. The Council has continuously engaged with the Highway Authority throughout the Local Plan process and the identification of the extension to this site. Through these discussions no objections have been raised and the site was discussed during the previous round of hearing sessions that took place in January-March 2024 and no subsequent concerns were identified by the Inspector.</p> <p>This engagement with the Highway Authority has led to the requirement within the site-specific policy to provide a Transport Assessment that includes the analysis of the development's impact on the local road network, including during construction periods, and identify any potential mitigation solutions as required.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC461
Response Date	19/12/2024 09:16:00
Full Name	John Clark
Organisation	
Agent Full Name	
Agent Organisation	

Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Will this proposed new development be for the benefit of local people. Or will it be for the benefit of London, home counties second home owners? (Parkview for example). More traffic on Roughton Rd, Mill Rd and Carr Lane, roads that are not suitable for even more traffic. Do we need a new care home when Benjimen Court is half empty? Proposed road improvements to the A149, will these be done before occupation or long after? This proposed development will only be of benefit to the developers and holiday home owners, as local people will not be able to afford most of the properties.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: More traffic on Roughton Rd, Mill Rd and Carr Lane, roads that are not suitable for even more traffic. Proposed road improvements to the A149, will these be done before occupation or long after? This proposed development will only be of benefit to the developers and holiday home owners, as local people will not be able to afford most of the properties.</p>
Officer Response	<p>Comments noted. The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole which has resulted in the requirement within the site-specific policy to provide a Transport Assessment that includes the analysis of the development's impact on the local road network, including during construction periods, and identify any potential mitigation solutions as required. The provision of a roundabout at the southerly most access point onto the A149 is required to be provided prior to occupation of dwellings on the site as set out in the site-specific policy.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC465
Response Date	18/12/2024 20:31:00
Full Name	Andrew Sadler
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>As a resident of Cromer Road, Roughton, I would like to express concerns about this proposal, as it seems to indicate that the proposed development area in Cromer would be provided access to Roughton Road, Cromer.</p> <p>The piece of road in question is a small rural road, which is in places not wide enough to accommodate two vehicles, and which adjoins in one direction a populated suburb of Cromer, and the other a small hamlet, forming part of Roughton.</p> <p>This road is already subject to excessive traffic, using it as a cut through to avoid the main road into Cromer, making it an already difficult carriageway for pedestrians, cyclists and Horse Riders. Any increase in traffic will undoubtedly increase the risk to all road users.</p> <p>The piece of road where this proposed development would have access is a natural barrier between the suburbs of Cromer and the rural community of Roughton. It is a piece of road, subject to a National Speed limit, not wide enough to accommodate two-way traffic, with no street lighting, no footpath and no cycleway.</p> <p>As a parent with school aged children who have to use this road to get to their nearest school in Cromer, I strongly urge you to consider the negative impact this access will bring.</p> <p>As a pedestrian, cyclist and Horse Rider who uses this piece of road, I ask the same.</p> <p>Additionally, as well as the traffic implications, I disagree with the blight any new development will have on a green belt piece of land between two parishes. We live in an area of outstanding natural beauty, which is envied by many. Why would we want to throw that away?</p> <p>I am not against building, but i do not agree with the wanton destruction of rural England by any political party in order to prove a point.</p> <p>You have the limited power to have an influence on this, and i ask you, as local people, to use that power and seriously question the viability of this proposal.</p>

Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: The piece of road in question is a small rural road, which is in places not wide enough to accommodate two vehicles, and which adjoins in one direction a populated suburb of Cromer, and the other a small hamlet, forming part of Roughton. This road is already subject to excessive traffic, using it as a cut through. The piece of road where this proposed development would have access is a natural barrier between the suburbs of Cromer and the rural community of Roughton. It is a piece of road, subject to a National Speed limit, not wide enough to accommodate two-way traffic, with no street lighting, no footpath and no cycleway.</p> <p>Additionally, as well as the traffic implications, I disagree with the blight any new development will have on a green belt piece of land between two parishes. We live in an area of outstanding natural beauty, which is envied by many.</p>
Officer Response	<p>Comments noted. The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole which has resulted in the requirement within the site-specific policy to provide a Transport Assessment that includes the analysis of the development's impact on the local road network, including during construction periods, and identify any potential mitigation solutions as required. The Highways Authority confirmed that vehicular access onto Roughton Road from either C22/4 or C19/2 is unsuitable and not supported therefore, the site-specific policy does not include access onto Roughton Road.</p> <p>The site is not included within the Green Belt as this designation is not present within North-Norfolk. The site-specific policy includes mitigation requirements to offset the site's potential impact on the National Landscape. The Council provided a detailed response to the need to provide growth within the National Landscape and this is set out in the Council's Matter 5 Statement (EH011(a)(i)). A detailed site-specific assessment of the site's impact on the National Landscape is available to view in the Additional Sites Review Background Paper Appendix 1, the conclusion of which is that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC466
Response Date	19/12/2024 09:26:00
Full Name	Ellie McCann
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am raising objections based on the following:</p> <ol style="list-style-type: none"> 1) Roughton Road is unsuitable as an access road into the proposed housing development - as already stated by Norfolk County Highways. By creating access roads onto Roughton Road, this would cause harm by: <ol style="list-style-type: none"> a) Increasing traffic down a country lane, already struggling to cope with traffic, endangering the community. b) Create a rat run between Roughton Road and the Norwich Road, exaggerating point a. c) Infringe on Roughton and it's cultural and social heritage - Roughton is a distinct village, separate from Cromer. As a Cromer development, this should not impact on the local identity and community of Roughton. d) Destroy hedgerow ecosystems and habitat. We have observed many protected bird species - last week alone we observed short eared owls in these fields (we have photos to prove it!),

	<p>and we regularly see barn owls, migrating sea birds, many species of deer, hare, and bats. We have also seen slow worms, adders and lizards in these fields.</p> <p>e) Cause harm to the local amenity of the area - this area is part of the North Norfolk AONB. Developments should not be allowed to sprawl.</p> <p>f) Future concerns and setting a precedent that once there are access roads to this site off of Roughton Road, the fields opposite will then be developed. This cannot be allowed to happen - existing residents and nature deserve space to thrive in a safe, clean, community environment.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: Roughton Road is unsuitable as an access road into the proposed housing development - as already stated by Norfolk County Highways. By creating access roads onto Roughton Road, this would cause harm by</p> <p>a) Increasing traffic down a country lane, already struggling to cope with traffic, endangering the community.</p> <p>b) Create a rat run between Roughton Road and the Norwich Road, exaggerating point a.</p> <p>c) Infringe on Roughton and it's cultural and social heritage - Roughton is a distinct village, separate from Cromer. As a Cromer development, this should not impact on the local identity and community of Roughton.</p> <p>d) Destroy hedgerow ecosystems and habitat. We have observed many protected bird species - last week alone we observed short eared owls in these fields (we have photos to prove it!), and we regularly see barn owls, migrating sea birds, many species of deer, hare, and bats. We have also seen slow worms, adders and lizards in these fields.</p> <p>e) Cause harm to the local amenity of the area - this area is part of the North Norfolk AONB. Developments should not be allowed to sprawl.</p> <p>f) Future concerns and setting a precedent that once there are access roads to this site off of Roughton Road, the fields opposite will then be developed. This cannot be allowed to happen - existing residents and nature deserve space to thrive in a safe, clean, community environment.</p>
Officer Response	<p>Comments noted. The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole which has resulted in the requirement within the site-specific policy to provide a Transport Assessment that includes the analysis of the development's impact on the local road network, including during construction periods, and identify any potential mitigation solutions as required. The Highway Authority confirmed that vehicular access onto Roughton Road from either C22/4 or C19/2 is unsuitable and not supported and no vehicular access is proposed onto Roughton Road within the site-specific policy.</p> <p>Whilst located on the edge of Cromer's settlement boundary, the site does lie within the parish boundaries of Roughton and Northrepps. However, the site is most closely related to Cromer and services and facilities therein and does not conflict with the operation of the Small Growth Village approach set out in the Local Plan.</p> <p>The site-specific policy includes requirements to provide green infrastructure, retention of hedgerows and trees, provide open space and landscaping that maximises connectivity with the inclusion of biodiversity improvements and enhancements to existing key features such as the Beckett's Plantation.</p> <p>The site-specific policy includes mitigation requirements to offset the site's potential impact on the National Landscape. The Council provided a detailed response to the need to provide growth within the National Landscape and this is set out in the Council's Matter 5 Statement (EH011(a)(i)). A detailed site-specific assessment of the site's impact on the National Landscape is available to view in the Additional Sites Review Background Paper Appendix 1, the conclusion of which is that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and</p>

	sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape.
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC468
Response Date	19/12/2024 09:31:00
Full Name	Mrs Jane Wisson
Organisation	Town Clerk Cromer Town Council
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Norwich Road/Roughton Road</p> <p>Whilst we recognise that this is a far better option in regard to housing there are still significant issues with the demarcation of settlements between the town of Cromer, Northrepps Parish and Roughton Parish. The original number of properties would have had a significant impact on the current infrastructure of all areas but if this is to increase further additional impact would be seen. This site is also on the cusp of the Norfolk Coast National Landscape (former AONB) and this would have further implications on the location.</p> <p>Concerns from residents about the increased number of children and the lack of road safety measures to ensure pedestrian safety – the increase in the number of vehicles on an already overloaded road and the lack of traffic calming e.g. Mini roundabouts which will need addressing.</p> <p>Whilst we realise that the following issues are discussed separately, we feel that they should be mentioned with our submission as to why this site is not a viable option. The additional impact these and the next site will have on local infrastructure around the following areas</p> <p>NHS – the impact on the current Doctors surgery as well as the lack of NHS dentists available for residents in Cromer and the local area. This in turn will also have an impact on the local hospital appointments. The current infrastructure is at its limit and whilst we realise it doesn't form part of the Planning Inspectors decision making it does have a huge impact on the town.</p> <p>Economy – whilst both sites will increase some spend in the towns/parishes the lack of sustainable jobs in an area that has a significant number of seasonal positions rather than longer term. The area is also renowned for the vast volume of second homes which whilst does support the economy it doesn't significantly enhance the investment that would be otherwise needed.</p> <p>Highways – The Clifton Park site will either need to access via the main coast road A149 which in the Summer is extremely busy and would be dangerous or on a side road which can experience high volume of traffic congestion.</p> <p>The Norwich Road site will have a significant impact on the Health and Safety of local residents especially children walking to local schools as the road network currently does not provide a safe crossing space in this area. Mini roundabouts will be needed to ensure safety for cars entering and exiting from various locations along that stretch of road and reduction in speed limits will be needed.</p> <p>Flooding has also been recorded as an issue on this particular area and would need further investigation if these additional houses and the impact they may have.</p> <p>Affordable Housing – ours and our residents concerns are about affordable housing for the current community that whilst developers and developments are asked to provide historically this doesn't seem to come to fruition. The lack of powers to ensure that the agreed amount of these houses is set aside for local people to obtain access to is minimal if any at all. So, residents are unable to stay near family support but have to move elsewhere. If these developments are to go ahead additional and increased enforcement powers are needed to ensure that this issue is further addressed. North Norfolk has a severe issue with homelessness this will just add to the problem unless addressed.</p> <p>So, in conclusion Cromer Town Council does not support the inclusion of the Clifton Park Site in the Local Plan at all and would request alternative sites are relooked at. We also would ask that the planned increase on the Norwich Road/Roughton Road site is maintained at the previous housing levels rather than increasing the settlement numbers and further work is investigated around the current infrastructure to ensure that it is sustainable in the longer term.</p>
Do you consider it necessary to participate in a public hearing	

session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: The Norwich Road site will have a significant impact on the Health and Safety of local residents especially children walking to local schools as the road network currently does not provide a safe crossing space in this area. Mini roundabouts will be needed to ensure safety for cars entering and exiting from various locations along that stretch of road and reduction in speed limits will be needed.</p> <p>the impact on the current Doctors surgery as well as the lack of NHS dentists available for residents in Cromer and the local area. This in turn will also have an impact on the local hospital appointments. whilst both sites will increase some spend in the towns/parishes the lack of sustainable jobs in an area that has a significant number of seasonal positions rather than longer term. The area is also renown for the vast volume of second homes which whilst does support the economy it doesn't significantly enhance the investment that would be otherwise needed.</p> <p>Flooding has also been recorded as an issue on this particular area and would need further investigation if these additional houses and the impact they may have.</p> <p>ours and our residents concerns are about affordable housing for the current community that whilst developers and developments are asked to provide historically this doesn't seem to come to fruition. The lack of powers to ensure that the agreed amount of these houses is set aside for local people to obtain access to is minimal if any at all.</p>
Officer Response	<p>Comments noted. The site-specific policy for C22/4 includes requirements to retain and upgrade the existing public footpath to a surfaced route with the additional provision or a new route which connects to Roughton Road. This will provide a more sustainable means of connectivity that encourages active travel between the site and services and facilities located on Roughton Road. The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole which has resulted in the requirement within the site-specific policy to provide a Transport Assessment that includes the analysis of the development's impact on the local road network, including during construction periods, and identify any potential mitigation solutions as required.</p> <p>The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning in Health Protocol. The protocol presents a process describing how relevant NHS organisations, Norfolk & Suffolk County Councils, Public Health and the Norfolk and East Suffolk Local Planning Authorities jointly engage to ensure that health considerations are adequately accounted for in plan making and in planning applications and their subsequent developments so that the appropriate authorities can plan and priorities investment(s).</p> <p>Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p> <p>The site-specific policy includes requirements to the implementation of a surface water management plan that ensures there is no adverse effects on European sites and greenfield run-off rates are not increased. This is in addition to other requirements in the policy that require a foul drainage strategy to be undertaken and the provision of enhancements to sewerage infrastructure prior to the first occupation of any dwellings. The site is expected to provide affordable housing in line with Policy HOU2 as set out in the Local Plan.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC470
Response Date	19/12/2024 12:55:00
Full Name	Karen Rose
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	Access to Roughton Road must remain for pedestrian access only for this proposal and any future applications. Pedestrian access onto Roughton Road would need to be included with a section 106 agreement to ensure safe pedestrian passage to the Roughton Road Rail

	Station. There is no current footpath beyond Compit Hills to the proposed pedestrian access from the site.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Access to Roughton Road must remain for pedestrian access only for this proposal and any future applications. Pedestrian access onto Roughton Road would need to be included with a section 106 agreement to ensure safe pedestrian passage to the Roughton Road Rail Station. There is no current footpath beyond Compit Hills to the proposed pedestrian access from the site.
Officer Response	The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and as a result of discussions relating to this consultation, the Highway Authority confirmed that vehicular access onto Roughton Road from either C22/4 or C19/2 is unsuitable and not supported and no vehicular access is proposed onto Roughton Road within the site-specific policy. The site-specific policy for C22/4 includes requirements to retain and upgrade the existing public footpath to a surfaced route with the additional provision of a new route which connects to Roughton Road. This will provide a more sustainable means of connectivity that encourages active travel between the site and services and facilities located on Roughton Road.
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC474
Response Date	19/12/2024 11:13:00
Full Name	Jonathan Grimley
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	I object to these building plans. We moved to Burnt Hills, Cromer for peace and quiet and we planned for it to be our forever home. The disruption these plans will cause will be off the scale before and after completion. We don't have the infrastructure locally and people currently struggle to even see doctor. These plans would also have a huge impact on wildlife
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: We don't have the infrastructure locally and people currently struggle to even see doctor. These plans would also have a huge impact on wildlife
Officer Response	Comments noted. The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance

	<p>with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p> <p>The site-specific policy includes requirements to provide green infrastructure, retention of hedgerows and trees, provide open space and landscaping that maximises connectivity with the inclusion of biodiversity improvements and enhancements to existing key features such as the Beckett's Plantation.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC475
Response Date	19/12/2024 11:50:00
Full Name	Dale & Paula Viles
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>We have viewed the plans for this proposed development and, on the whole, they appear to have been given some consideration concerning the general environment that people will be living in. Beckett's Plantation will be preserved, and there seem to be provision for other green spaces within the development.</p> <p>However, we do have many concerns. As far as we know, this proposed development of 500 dwellings, elderly accommodation, and sport and recreation facilities, is within the Parish of Roughton, which we would consider overdevelopment of the open character of the village and surrounding area.</p> <p>NNDC has declared a climate emergency in early 2019, so they have shown a commitment to environmental issues. We couldn't find any information in the proposed development plans regarding the dwellings themselves. For instance, will they be built with a high standard of insulation and triple glazed windows and doors. Will the dwellings have solar panels to ease pressure on the National Grid. Will the dwellings be provided with electric vehicle charging points.</p> <p>Although the development will provide green spaces, will they be enriched with native trees, shrubs, and wildflowers, which would improve biodiversity and absorb excess carbon. As well as being of benefit to residents, it would also provide valuable wildlife corridors. Would there be adequate provision for the capture of storm water, as flooding off the field and into local resident gardens has occurred in extreme conditions. It is a concern that with development there would be roads and hard surfacing which was never there before, so has any thought been given to the protection of residents on Roughton Road.</p> <p>Our other concerns regard the increased burden of the local infrastructure:</p> <p>Roads: Although access to the proposed development would include two access points onto the A149, there is a proposed extension which could provide vehicular access to Roughton Road. Roughton Road is unsuitable for heavy traffic. We have experienced increased traffic since the development of the field next to the Amazona Zoo. Whilst that site was being developed, there was a very heavy increase in works traffic, with some drivers paying little heed to the speed limit. Any extra traffic would cause intolerable congestion on Roughton Road.</p> <p>Anglian Water: Would Anglian Water be able to cope with the proposed high increase of dwellings in the area, when they are already dealing with repairing leaks in an aging system, and protecting our waterways and coast from pollution by sewage and runoff.</p> <p>Local Schools, Doctor and Dental Surgeries, Local Hospital: Would these establishments be able to cope with the sudden influx of families and elderly residents, who would need medical care and education.</p> <p>We are also concerned about the loss of productive, arable land in a world where supply chains are fragile.</p> <p>The developers stated that this development would make a suitable "gateway" to Cromer, but what could be a better gateway than the beautiful open countryside that is already there? It would make more sense to develop brownfield sites which are more of an eyesore than to destroy forever the thing that attracts people to Cromer and the surrounding area in the first place, which is the beautiful countryside, dark skies and dramatic coast.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	

<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>Object: We couldn't find any information in the proposed development plans regarding the dwellings themselves. For instance, will they be built with a high standard of insulation and triple glazed windows and doors. Will the dwellings have solar panels to ease pressure on the National Grid. Will the dwellings be provided with electric vehicle charging points.</p> <p>Although the development will provide green spaces, will they be enriched with native trees, shrubs, and wildflowers, which would improve biodiversity and absorb excess carbon. As well as being of benefit to residents, it would also provide valuable wildlife corridors. Would there be adequate provision for the capture of storm water, as flooding off the field and into local resident gardens has occurred in extreme conditions.</p> <p>Although access to the proposed development would include two access points onto the A149, there is a proposed extension which could provide vehicular access to Roughton Road. Roughton Road is unsuitable for heavy traffic. We have experienced increased traffic since the development of the field next to the Amazona Zoo. Whilst that site was being developed, there was a very heavy increase in works traffic, with some drivers paying little heed to the speed limit. Any extra traffic would cause intolerable congestion on Roughton Road.</p> <p>Would Anglian Water be able to cope with the proposed high increase of dwellings in the area, when they are already dealing with repairing leaks in an aging system, and protecting our waterways and coast from pollution by sewage and runoff.</p> <p>Local Schools, Doctor and Dental Surgeries, Local Hospital: Would these establishments be able to cope with the sudden influx of families and elderly residents, who would need medical care and education. We are also concerned about the loss of productive, arable land in a world where supply chains are fragile.</p> <p>It would make more sense to develop brownfield sites which are more of an eyesore than to destroy forever the thing that attracts people to Cromer and the surrounding area in the first place, which is the beautiful countryside, dark skies and dramatic coast.</p>
<p>Officer Response</p>	<p>Comments noted. The site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan, including Policy ENV 8 - High Quality Design and policies relating to sustainable construction, energy efficiency and electric vehicle charging. The site-specific policy includes requirements to provide green infrastructure, retention of hedgerows and trees, provide open space and landscaping that maximises connectivity with the inclusion of biodiversity improvements and enhancements to existing key features such as the Beckett's Plantation. Additionally, the policy includes for the implementation of a surface water management plan that ensures there is no adverse effects on European sites and greenfield run-off rates are not increased. This is in addition to other requirements in the policy that require a foul drainage strategy to be undertaken and the provision of enhancements to sewerage infrastructure prior to the first occupation of any dwellings. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.</p> <p>The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and as a result of discussions relating to this consultation, the Highway Authority confirmed that vehicular access onto Roughton Road from either C22/4 or C19/2 is unsuitable and not supported and no vehicular access is proposed onto Roughton Road within the site-specific policy. A Transport Assessment that includes the analysis of the development's impact on the local road network, including during construction periods, and identifies any potential mitigation solutions will be required.</p> <p>The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning in Health Protocol. The protocol presents a process describing how relevant NHS organisations, Norfolk & Suffolk County Councils, Public Health and the Norfolk and East Suffolk Local Planning Authorities jointly engage to ensure that health considerations are adequately accounted for in plan making and in planning applications and their subsequent developments so that the appropriate authorities can plan and priorities investment(s). Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p> <p>The Council has a Brownfield Register, there are not enough sites on this register to accommodate the required growth needed as set out in Policy SS1 and many potential brownfield sites are unsuitable due to location or other constraints.</p>

Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC476
Response Date	19/12/2024 11:46:00
Full Name	Kelly Leeder
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>As a concerned resident of Burnt Hills, I strongly object to the proposed building plan ...2.2Cromer. Land west of Pine Tree (C22/4) extended site allocation; I feel it would be detrimental to the deer/ hares & bird wildlife population. There are few corridors they can use to go from one habitat to another & this is highly used.</p> <p>Then there is all the other boring infrastructure issues that such a large scale build would bring, you cannot get a doctors appointment now in under a month & then there is the issue of traffic build up; bottle neck on the A149 from the Roughton end into Cromer & also the planned access on the Northrepps side.</p> <p>Are the Local people actually going to benefit from cheap housing, I don't think so; if other developments are anything to go by... & there are a lot of houses in Cromer that are not selling anyway.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: I strongly object to the proposed building plan ...2.2Cromer. Land west of Pine Tree (C22/4) extended site allocation; I feel it would be detrimental to the deer/ hares & bird wildlife population. There are few corridors they can use to go from one habitat to another & this is highly used.</p> <p>Then there is all the other boring infrastructure issues that such a large scale build would bring, you cannot get a doctors appointment now in under a month & then there is the issue of traffic build up; bottle neck on the A149 from the Roughton end into Cromer & also the planned access on the Northrepps side.</p>
Officer Response	<p>Comments noted. The site-specific policy includes requirements to provide green infrastructure, retention of hedgerows and trees, provide open space and landscaping that maximises connectivity with the inclusion of biodiversity improvements and enhancements to existing key features such as the Beckett's Plantation.</p> <p>The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole which has resulted in the requirement within the site-specific policy to provide a Transport Assessment that includes the analysis of the development's impact on the local road network, including during construction periods, and identify any potential mitigation solutions as required. The Highway Authority confirmed that vehicular access onto Roughton Road from either C22/4 or C19/2 is unsuitable and not supported and no vehicular access is proposed onto Roughton Road within the site-specific policy.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC481
Response Date	17/12/2024 13:37:00
Full Name	Ms Christina Phillips
Organisation	
Agent Full Name	
Agent Organisation	

Does the Proposed Change contribute to the overall soundness of the Plan?	I wish to register my objection the subject matter; The Roughton Road has enough traffic travelling north and south. Despite the speed limit, vehicles continue to exceed this and many are unmindful of pedestrians. I have had to jump up the bank a few times. I would presume there will be MANY more if this goes ahead. Also, I'm concerned about the extra pressure on our services e.g. Doctors, Dentists, Hospital, Social Services. Please consider this objection.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: The Roughton Road has enough traffic travelling north and south. Despite the speed limit, vehicles continue to exceed this and many are unmindful of pedestrians. Also, I'm concerned about the extra pressure on our services e.g. Doctors, Dentists, Hospital, Social Services. Please consider this objection.
Officer Response	Comments noted. The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and as a result of discussions relating to this consultation, the Highways Authority confirmed that vehicular access onto Roughton Road from either C22/4 or C19/2 is unsuitable and not supported. Cromer is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC482
Response Date	18/12/2024 20:09:00
Full Name	Tim Leeder
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	My point is that North Norfolk Council is slowly but surely turning Cromer into an over populated area with no infrastructure to deal with hundreds of homes and people. Cromer Doctors, dentists and parking cannot cope now let alone the damage you will be doing to the Wildlife that constantly use these green fields to roam freely. To start building on greenfield sites just to house people moving in from other counties and not locals is absolutely ridiculous and will have a major impact for the future for the ability to grow/produce are own food in this country. Let's be honest here the land owners are only interested in Making a huge some of money in selling / developing this land and not to the interest of local people of Cromer.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: Cromer Doctors, dentists and parking cannot cope now let alone the damage you will be doing to the Wildlife that constantly use these green fields to roam freely. To start building on greenfield sites just to house people moving in from other counties and not locals

	is absolutely ridiculous and will have a major impact for the future for the ability to grow/produce are own food in this country.
Officer Response	<p>The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning in Health Protocol. The protocol presents a process describing how relevant NHS organisations, Norfolk & Suffolk County Councils, Public Health and the Norfolk and East Suffolk Local Planning Authorities jointly engage to ensure that health considerations are adequately accounted for in plan making and in planning applications and their subsequent developments so that the appropriate authorities can plan and priorities investment(s). Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p> <p>The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. Cromer is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of agricultural land would prevent the level of growth needed as identified in the Local Plan, the Council has a Brownfield Register however, there are not enough sites on this register to accommodate the required growth needed as set out in Policy SS1 and many potential brownfield sites are unsuitable due to location or other constraints.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC497
Response Date	16/12/2024 14:52:00
Full Name	Robert Ford
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I would like to object to any building of a housing estate of the size Gurney and Cable want to build.</p> <p>We all know that the government want to build more housing but this type of housing and the very fact it is same old names that crop up when land is built on. In Cabbels case, why not build in front of his castle where the silly two month a year camp site is or the not used Football golf.</p> <p>As for Football field and the like there are much more important issues to finance than that.</p> <p>No building should take place in this town owing to the infrastructure not being in place, i.e 5 weeks for a doctor appointment. Roads now becoming crowded, Public toilets being closed etc.</p> <p>The council can see no further than the extra income from council tax and its not good enough.</p> <p>No No No any planning application for Roughton Road won't cope with it and any plans to put roads and pathways through to Burnt Hills will be a disaster as the paths and road are crumbling now.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: No building should take place in this town owing to the infrastructure not being in place, i.e 5 weeks for a doctor appointment. Roads now becoming crowded, Public toilets being closed etc. No No No any planning application for Roughton Road won't cope with it and any plans to put roads and pathways through to Burnt Hills will be a disaster as the paths and road are crumbling now.
Officer Response	Comments noted. The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and as a result of discussions relating to this consultation, the Highways Authority confirmed that

	<p>vehicular access onto Roughton Road from either C22/4 or C19/2 is unsuitable and not supported. The site-specific policy for C22/4 includes requirements to retain and upgrade the existing public footpath to a surfaced route with the additional provision or a new route which connects to Roughton Road. This will provide a more sustainable means of connectivity that encourages active travel between the site and services and facilities located on Roughton Road.</p> <p>Cromer is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC499
Response Date	19/12/2024 09:29:00
Full Name	Mrs Anne Battersby
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	I am 81 and do not drive anymore and rely on public transport. Roughton road between Holway Close where I live to walk to bus or train station is not a safe place, cars drive far to fast over the 30 mile per hour, more cars on the said road would be a nightmare. Walking in this area is joyful, plenty of wild life and all the work going on around the fields to encourage more wild life would be a waste of time. So please think very carefully about the plans posted through my door. Please do not make Cromer, Roughton a nother very bad place to live.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: Roughton road between Holway Close where I live to walk to bus or train station is not a safe place, cars drive far to fast over the 30 mile per hour, more cars on the said road would be a nightmare. Walking in this area is joyful, plenty of wild life and all the work going on around the fields to encourage more wild life would be a waste of time. So please think very carefully about the plans posted through my door. Please do not make Cromer, Roughton a nother very bad place to live.
Officer Response	<p>Comments noted. The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole which has resulted in the requirement within the site-specific policy to provide a Transport Assessment that includes the analysis of the development's impact on the local road network, including during construction periods, and identify any potential mitigation solutions as required.</p> <p>The site-specific policy for C22/4 includes requirements to retain and upgrade the existing public footpath to a surfaced route with the additional provision or a new route which connects to Roughton Road. This will provide a more sustainable means of connectivity that encourages active travel between the site and services and facilities located on Roughton Road.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC504
Response Date	18/12/2024 16:12:00
Full Name	Mr Patrick A'Hern
Organisation	Innova Consulting Services
Agent Full Name	Louise

	Follett
Agent Organisation	Corylus Planning & Environmental Ltd
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>Paragraph 1.2 of Exam Doc FC001(b) Further Consultation Document (Nov 2024) is clear that the Inspector's Interim Findings letter dated 24th May 2024 identified an overall shortfall in planned housing provision in the Draft Plan.</p> <p>To deliver the enhanced level of housing numbers required a subsequent increase in sites and an amendment to the spatial strategy with regard to small growth villages has been required.</p> <p>Paragraph 1.3.2 of Exam Doc FC001(b) states;</p> <p>"If all of the Proposed Changes outlined in this consultation document are made to the Plan it will enable a minimum of 1,271 additional dwellings to come forward over the Plan period 2024-2040".</p> <p>However, the Inspector's letter at Appendix 7 of Exam Doc FC001(b) dated 30th August 2024 states at paragraph 5;</p> <p>"Turning to the Council's proposals to increase the supply and flexibility of housing delivery by approximately 1,300 to 1,500 additional dwellings over the plan period, depending on how it is done this should be a good basis for the examination to proceed."</p> <p>It would seem that the Council have fallen short of the Inspector's initial expectations by a minimum of 30 dwellings and potentially up to 230 dwellings.</p> <p>In order to remedy this position our clients are in a position to offer additional land at Cromer, one of the three towns in the emerging Local Plan identified for growth, for allocation for residential purposes.</p> <p>Cromer is a sustainable location for growth with a range of services and facilities including primary and secondary education, retail services and health facilities including a hospital. Cromer hospital provides a wide range of consultant-led outpatient services, day case operations and a Minor Injuries Unit (MIU) and is open seven days a week, from 8am to 7.45pm.</p> <p>Cromer is served by both rail and bus services offering choices for travel other than the private car to surrounding rural settlements and to the south to Norwich.</p> <p>Cromer has a range of social, leisure and sports facilities as well as churches, clubs and societies, it is a well-established existing community.</p> <p>Cromer therefore provides a sustainable and self-contained location for housing growth with residents able to access a wide range of services and facilities by walking, cycling or other modes of transport reducing reliance on, and the need to travel by, the private car.</p> <p>Cromer is identified in the emerging Local Plan as one of three towns to receive growth over the plan period 2020-2040 however this consultation only proposes to increase that growth by 170 dwellings out of a potential 1300- 1500 units anticipated by the Inspector (letter dated 30th August 2024). Additional units in the consultation are proposed by increasing a large strategic allocation at North Walsham and by increasing rural growth, i.e by pursuing a strategy of more dispersed growth.</p> <p>The 170 units additional units proposed at Cromer in this consultation are not in addition to the allocations for Cromer in Exam Doc A1 owing to the following;</p> <ol style="list-style-type: none"> 1. The acknowledgement of the Council at Exam Doc EH006 (g) (p.353) that draft allocation CO7/2 will not deliver in the plan period. 2. Draft allocation C16 now has planning permission for less dwellings than the draft allocation, (118 rather than 150). 3. 1 and 2 above result in a loss of (22+32) 52 allocated dwellings for Cromer. 4. The net gain at Cromer in this consultation is therefore 118 units, just 9% of the Inspector's 1300 additional units or 8% of 1500 additional units. <p>In order to provide flexibility in the emerging Local Plan and a range and choice of sites for housing delivery our clients can provide additional land at Cromer, in accordance with emerging spatial strategy, this is situated;</p> <ol style="list-style-type: none"> 1. Immediately to the west of site C22/4 and to the east of Roughton Road - with capacity for approximately 70 dwellings. This site could be accessed from the emerging allocation C22/4. 2. Land to the east of Norwich Road – with capacity for approximately 80-100 dwellings. <p>An annotated drawing at Appendix 1 attached to this representation shows the location and extent of proposed sites 1 and 2.</p> <p>The Council and the Inspector are advised that either site, 1 or 2 are able to come forward independently of each other.</p>

	<p>Our client's proposed sites support the soundness of the plan ensuring that it is positively prepared by providing a range and choice of sites facilitating the delivery of market and affordable homes, plus homes for the elderly at sustainable locations in accordance with the emerging spatial strategy of the Local Plan. The sites are located in close proximity to Roughton Road train station and the bus services that operate along both Norwich Road and Roughton Road which also provide sustainable travel choices.</p> <p>Our client's proposed sites will ensure that the emerging local Plan is effective with regard to housing delivery by providing a range and choice of sites over the plan period at a sustainable location, the Inspector having already accepted that development in the National Landscape is required to facilitate growth at Cromer.</p> <p>Our client's sites are therefore duly put forward to the Inspector for further consideration for site allocation at Cromer through Local Plan examination.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	In order to answer any questions the Inspector or others may have about our client's sites and these representations and to participate in any debate about housing allocations in and around Cromer.
File (where submitted)	Appendix 1 Cromer Boundaries - 09.12.2024.pdf
Officer Summary	<p>Paragraph 1.2 of Exam Doc FC001(b) Further Consultation Document (Nov 2024) is clear that the Inspector's Interim Findings letter dated 24th May 2024 identified an overall shortfall in planned housing provision in the Draft Plan.</p> <p>The 170 units additional units proposed at Cromer in this consultation are not in addition to the allocations for Cromer in Exam Doc A1 owing to the following;</p> <ol style="list-style-type: none"> 1. The acknowledgement of the Council at Exam Doc EH006 (g) (p.353) that draft allocation CO7/2 will not deliver in the plan period. 2. Draft allocation C16 now has planning permission for less dwellings than the draft allocation, (118 rather than 150). 3. 1 and 2 above result in a loss of (22+32) 52 allocated dwellings for Cromer. 4. The net gain at Cromer in this consultation is therefore 118 units, just 9% of the Inspector's 1300 additional units or 8% of 1500 additional units. <p>In order to provide flexibility in the emerging Local Plan and a range and choice of sites for housing delivery our clients can provide additional land at Cromer, in accordance with emerging spatial strategy, this is situated;</p> <ol style="list-style-type: none"> 1. Immediately to the west of site C22/4 and to the east of Roughton Road - with capacity for approximately 70 dwellings. This site could be accessed from the emerging allocation C22/4. 2. Land to the east of Norwich Road – with capacity for approximately 80-100 dwellings. <p>An annotated drawing at Appendix 1 attached to this representation shows the location and extent of proposed sites 1 and 2.</p> <p>The Council and the Inspector are advised that either site, 1 or 2 are able to come forward independently of each other.</p>
Officer Response	<p>Comments noted and proposed alternative sites are acknowledged. The Council's approach as set out in the Action Plan for this consultation already takes into account the updated position of proposed allocation, C07/2. Proposed allocation, C16 has now received planning permission however, construction on the site has not commenced and permission is not a guarantee of delivery, therefore the site remains within the Council's list of allocations in the Local Plan and the Council's Housing Trajectory, this approach has been taken for other proposed allocations in the Plan that have received planning permission but have not begun construction.</p> <p>The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing.</p>
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC505
Response Date	18/12/2024 16:12:00
Full Name	Mr Patrick A'Hern

Organisation	Innova Consulting Services
Agent Full Name	Louise Follett
Agent Organisation	Corylus Planning & Environmental Ltd
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>Our client supports the proposed extension of draft allocation C22/2 to that shown as proposed allocation C22/4 – Land West of Pine Tree Farm at Cromer.</p> <p>As submitted at the hearing sessions in February 2024 the Inspector will be aware that in order to deliver the southern roundabout access and provide adequate surface water drainage features to the south of the site (both criteria requirements of the draft emerging policy) it was necessary to expand the site area required for the initial draft allocation C22/2 of 400 dwellings.</p> <p>The emerging draft Policy C22/2 also had a criteria requirement for a substantial landscape buffer to the south of the allocated site to ensure adequate mitigation in the National Landscape. The location of this landscape buffer has been the subject of past discussions with the Council with consensus over the opportunity presented to strengthen and enhance existing field boundaries beyond the south of the C22/2.</p> <p>The extended allocation proposed at C22/4 makes effective use of land, as encouraged by paragraphs 123 and 124 subsections (a) & (b) of the National Planning Policy Framework (Dec 23) by including all field parcels up to the proposed landscape buffer (which remains a policy criteria requirement in emerging Policy C22/4). The extended area for development will therefore sit within the enhanced landscape buffer to the south of Cromer, the subject of previous negotiations with the local planning authority.</p> <p>Our client is currently in the process of preparing an outline planning application which demonstrates that a policy compliant scheme can be delivered at the site for 500 dwellings including open market and affordable housing, with land reserved for the provision of accommodation for older people and playing pitches, public open space and associated infrastructure including access.</p> <p>The Inspector has previously accepted the need for development within the National Landscape in order to facilitate growth at Cromer, expanding the proposed allocation allows new growth to be delivered comprehensively in a single development and makes best use of new highway infrastructure to be provided to deliver the allocation including the new southern roundabout.</p> <p>The proposed extension of allocation C22/4 supports the soundness of the plan ensuring that it is positively prepared by facilitating the delivery of market and affordable homes, plus homes for the elderly at a sustainable location in accordance with the emerging spatial strategy of the Local Plan. The site is located in close proximity to Roughton Road train station and the bus services on both Norwich Road and Roughton Road also contribute to sustainable travel choices.</p> <p>The allocation of C22/4 is justified by the evidence base supporting the Further Sites Consultation, including Appendix 1 – The Additional Sites Review Background Paper (including the Heritage Impact Assessment Addendum) and Appendix 5 - The Addendum to the Sustainability Appraisal (Nov 2024).</p> <p>The allocation of C22/4 is effective as the site is deliverable over the plan period and can contribute to the authority's five-year supply on adoption of the Local Plan.</p> <p>The allocation of C22/4 is consistent with national policy as it enables the delivery of sustainable development at a sustainable location in accordance with the policies of the National Planning Policy Framework and the spatial strategy of the emerging local plan to increase the housing supply of the authority over the plan period as identified by the Local Plan Inspector in his letter of 30th August 2024 - Appendix 7 of Exam Doc FC001(b).</p> <p>While our client is supportive of the Proposed Change 2 two matters are brought to the Inspectors attention for consideration;</p> <ol style="list-style-type: none"> 1. The inclusion of the railway bridge and highway land within the allocation mapping to the north of Pine Tree Farm. 2. Reference to provision of 'specialist elderly accommodation' <p><u>Allocation mapping</u></p> <p>Previous mapping accompanying submitted Policy C22/2 (paragraph 10.3 of Exam Doc A1) did not include the railway bridge or highway land to the north of Pine Tree Farm. Criteria 1 of Policy C22/2 stated;</p> <p><i>"1. Provision of a new segregated cycle/pedestrian footway along the Norwich Road including a dedicated footbridge (or suitable alternative) crossing over the railway;"</i></p>

Our client has been working with the local planning authority and the highway authority to evidence that an alternative walking and cycling route to Norwich Road is preferable such that the proposed wording for Criteria 1 of Policy C22/4 now states;

“1. Unless alternative routes are agreed by the Local Planning Authority in consultation with the Highway Authority, the provision of a new segregated cycle/pedestrian footway along the Norwich Road including a dedicated footbridge (or suitable alternative) crossing over the railway;”

The proposed new policy wording allows for an alternative walking and cycling route to be provided, however the railway bridge and highway land are now added into the mapping for the allocation.

It is noted that other allocation mapping in the emerging Local Plan does not include the highway land required to deliver the allocation as this is for any subsequent planning application to consider.

Our client does not want to be held ransom to Network Rail by providing a new footway and cycleway over the railway, indeed the Inspector raised this matter at Hearing Sessions in February 2024, however criteria 1 of proposed Policy **C22/4** is an acceptable solution.

Appendix 1 to this representation, prepared by Create, provides evidence that a new segregated cycle and pedestrian footway over the railway is not viable, to that end the removal of the railway bridge and highway land to the north of the allocation as a proposed extension to the allocation site as shown on mapping is requested to be removed.

Specialist Elderly Accommodation

Draft Policy **C22/4** states that site C22/4 should provide *“...67 dwellings equivalent of specialist elderly persons accommodation...”*

Paragraph 2.2.1 states;

“The combined site can deliver approximately 500 residential dwellings and 67 dwellings equivalent of specialist elderly persons accommodation, public open space and associated on-site and off-site infrastructure.”

The NPPF (Dec 23) states at paragraph 63 that housing for different groups in the community should be assessed and reflected in planning policies including *“older people (including those who require retirement housing, housing-with-care and care homes)”*. The NPPF therefore considers ‘specialist’ housing for the elderly as a subset of wider provision of housing for older people. This is borne out by the NPPF Glossary definition of ‘Older people’;

“People over or approaching retirement age, including the active, newly retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.”

It is not clear to a decision maker as to what ‘67 dwellings equivalent of specialist elderly persons accommodation’ would comprise. Paragraph 16d) of the NPPF (Dec ‘23) states that;

“Plans should:

d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;”

It is requested that the emerging Local Plan adopt the glossary definition of housing for older people to allow for allocations to provide the mix and range of housing types described in the glossary, including fully accessible M3(4) open market housing.

An overly prescriptive policy requirement for ‘X’ units of specialist elderly persons accommodation will increase risk for our client as the site may not be attractive to a developer of a particular type of specialist elderly persons accommodation, and the number of units to be provided as stated by the policy may not fit a market model for delivery resulting in a non-policy compliant scheme.

Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	In order to answer any questions the Inspector or others may have about Policy C22/4 and these representations and to participate in any debate about housing allocations in and around Cromer.
File (where submitted)	Appendix 1 - Walking and Cycling Route Strategy.pdf
Officer Summary	Support: As submitted at the hearing sessions in February 2024 the Inspector will be aware that in order to deliver the southern roundabout access and provide adequate surface water drainage features to the south of the site (both criteria requirements of the draft emerging

policy) it was necessary to expand the site area required for the initial draft allocation C22/2 of 400 dwellings. The emerging draft Policy C22/2 also had a criteria requirement for a substantial landscape buffer to the south of the allocated site to ensure adequate mitigation in the National Landscape. The location of this landscape buffer has been the subject of past discussions with the Council with consensus over the opportunity presented to strengthen and enhance existing field boundaries beyond the south of the C22/2.

The extended allocation proposed at **C22/4** makes effective use of land, as encouraged by paragraphs 123 and 124 subsections (a) & (b) of the National Planning Policy Framework (Dec 23) by including all field parcels up to the proposed landscape buffer (which remains a policy criteria requirement in emerging Policy C22/4). The extended area for development will therefore sit within the enhanced landscape buffer to the south of Cromer, the subject of previous negotiations with the local planning authority.

Our client is currently in the process of preparing an outline planning application which demonstrates that a policy compliant scheme can be delivered at the site for 500 dwellings including open market and affordable housing, with land reserved for the provision of accommodation for older people and playing pitches, public open space and associated infrastructure including access.

The allocation of **C22/4** is **justified** by the evidence base supporting the Further Sites Consultation, including Appendix 1 – The Additional Sites Review Background Paper (including the Heritage Impact Assessment Addendum) and Appendix 5 - The Addendum to the Sustainability Appraisal (Nov 2024).

The allocation of **C22/4** is **effective** as the site is deliverable over the plan period and can contribute to the authority's five-year supply on adoption of the Local Plan.

The allocation of **C22/4** is **consistent** with national policy as it enables the delivery of sustainable development at a sustainable location in accordance with the policies of the National Planning Policy Framework and the spatial strategy of the emerging local plan to increase the housing supply of the authority over the plan period as identified by the Local Plan Inspector in his letter of 30th August 2024 - Appendix 7 of Exam Doc FC001(b).

Our client has been working with the local planning authority and the highway authority to evidence that an alternative walking and cycling route to Norwich Road is preferable such that the proposed wording for Criteria 1 of Policy C22/4 now states;

"1. Unless alternative routes are agreed by the Local Planning Authority in consultation with the Highway Authority, the provision of a new segregated cycle/pedestrian footway along the Norwich Road including a dedicated footbridge (or suitable alternative) crossing over the railway;"

The proposed new policy wording allows for an alternative walking and cycling route to be provided, however the railway bridge and highway land are now added into the mapping for the allocation. It is noted that other allocation mapping in the emerging Local Plan does not include the highway land required to deliver the allocation as this is for any subsequent planning application to consider.

Appendix 1 to this representation, prepared by Create, provides evidence that a new segregated cycle and pedestrian footway over the railway is not viable, to that end the removal of the railway bridge and highway land to the north of the allocation as a proposed extension to the allocation site as shown on mapping is requested to be removed.

It is not clear to a decision maker as to what '67 dwellings equivalent of specialist elderly persons accommodation' would comprise. It is requested that the emerging Local Plan adopt the glossary definition of housing for older people to allow for allocations to provide the mix and range of housing types described in the glossary, including fully accessible M3(4) open market housing. An overly prescriptive policy requirement for 'X' units of specialist elderly persons accommodation will increase risk for our client as the site may not be attractive to a developer of a particular type of specialist elderly persons accommodation, and the number of units to be provided as stated by the policy may not fit a market model for delivery resulting in a non-policy compliant scheme.

Officer Response

Comments noted and support for proposed allocation noted. The Council will continue to engage with the site promoters to ensure the site's delivery.

The identification of land required for the provision of the footbridge will remain in policy following discussions between the Council and the Highways Authority, the site-specific policy includes the opportunity to seek alternative options, the Council would expect to see a viability report that suitably justifies why the footbridge cannot be delivered as part of any future planning application in addition to a proposed alternative as required by the policy.

The approach towards the provision of elderly care within the site-specific policies and Policy HOU2 were discussed at the previous hearing sessions undertaken in January-March 2024 and no concerns regarding this approach were subsequently raised by the inspector. The

	site promoter had the opportunity during these hearing sessions to raise this concern but no comments were provided at the time.
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC521
Response Date	19/12/2024 11:06:00
Full Name	Tessa Saunders
Organisation	Spatial & Strategic Planning Manager Anglian Water
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILES</p> <p>There is currently existing dry weather flow headroom at Cromer/ Runton Middlebrook Way WRC to accommodate additional growth within the catchment. We agree with Clause 11 but suggest that it is reworded for clarity to state:</p> <p><i>The submission, approval and implementation of a Foul Drainage Strategy providing details of any enhancements and setting out how additional foul flows will be accommodated within the foul sewerage network and delivered demonstrating that there is capacity available in the sewerage network and at the receiving water recycling centre to accommodate wastewater flows from the site prior to occupation of any dwellings;</i></p> <p>The supporting text should explain that developers must undertake pre-planning engagement with Anglian Water at the earliest opportunity to assess infrastructure capacity, and any specific requirements that may be needed to deliver the proposed development, which may include sustainable points of connection to our water supply and wastewater networks to minimise impacts on existing communities and the environment. There may be potential impacts on our network and storm overflows to be considered.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	Anglian Water Response - Front Page 19.12.24.pdf Appendix 1 WRC Capacity and Dry Weather Flow.pdf
Officer Summary	<p>There is currently existing dry weather flow headroom at Cromer/ Runton Middlebrook Way WRC to accommodate additional growth within the catchment. We agree with Clause 11 but suggest that it is reworded for clarity to state:</p> <p><i>The submission, approval and implementation of a Foul Drainage Strategy providing details of any enhancements and setting out how additional foul flows will be accommodated within the foul sewerage network and delivered demonstrating that there is capacity available in the sewerage network and at the receiving water recycling centre to accommodate wastewater flows from the site prior to occupation of any dwellings;</i></p> <p>The supporting text should explain that developers must undertake pre-planning engagement with Anglian Water at the earliest opportunity to assess infrastructure capacity, and any specific requirements that may be needed to deliver the proposed development, which may include sustainable points of connection to our water supply and wastewater networks to minimise impacts on existing communities and the environment. There may be potential impacts on our network and storm overflows to be considered.</p>
Officer Response	Comments noted. Agree to consider modification and amend as necessary. See modification schedule. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC532
Response Date	18/12/2024 15:03:00

Full Name	Caroline Jeffrey
Organisation	Principal Planner, Minerals and Waste Policy Norfolk County Council (Minerals & Waste)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>We are pleased to note that the following new or extended site allocations recognise the site is within a mineral safeguarding area, and include mineral safeguarding requirements within the following policies:</p> <ul style="list-style-type: none"> • Land West of Pine Tree Farm, Cromer (Policy C22/4) • Land East of Tunstead Road, Hoveton (Policy HV01/C) • Land at Brumstead Road, Stalham (Policy ST04/A) • Land Adjacent Ingham Road, Stalham (Policy ST19/B) • Land off Cromer Road & Church Lane, Mundesley (Policy MUN03/A) <p>The following site allocations are within a Minerals Safeguarding Area (sand and gravel), but this has not been included within the draft policy wording. Therefore, we object to these site allocation policies unless appropriate wording, regarding minerals safeguarding, is inserted into the following policies:</p> <ul style="list-style-type: none"> • Land at Stalham Road, Hoveton (Policy HV06/A) • Land at End of Mundesley Road, North Walsham (Policy NW16) • Land West of Langham Road, Blakeney (Policy BLA01/B) <p>The policy wording used in the North Norfolk Local Plan for other sites within Mineral Safeguarding Areas is currently: "The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority."</p> <p>Due to the progress on the Norfolk Minerals and Waste Local Plan, which is planned for adoption in 2025 and would then replace the current Minerals and Waste Core Strategy, we advise updating the policy wording for all allocated sites in the North Norfolk Local Plan that are within a Mineral Safeguarding Areas to be worded as follows: <i><u>"This site is underlain by a defined Mineral Safeguarding Area for sand and gravel resource; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resource does not take place."</u></i></p> <p>This wording is required to be inserted into the following policies HV06/A, NW16, BLA01/B and should also be used in policies C22/4, HV01/C, ST04/A, ST19/B and MUN03/A instead of the policy wording on mineral safeguarding used in the consultation document.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>We are pleased to note that the following new or extended site allocations recognise the site is within a mineral safeguarding area, and include mineral safeguarding requirements within the following policies:</p> <ul style="list-style-type: none"> • Land West of Pine Tree Farm, Cromer (Policy C22/4) <p>The policy wording used in the North Norfolk Local Plan for other sites within Mineral Safeguarding Areas is currently: "The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority."</p> <p>Due to the progress on the Norfolk Minerals and Waste Local Plan, which is planned for adoption in 2025 and would then replace the current Minerals and Waste Core Strategy, we advise updating the policy wording for all allocated sites in the North Norfolk Local Plan that are within a Mineral Safeguarding Areas to be worded as follows: <i><u>"This site is underlain by a defined Mineral Safeguarding Area for sand and gravel resource; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning</u></i></p>

	<p><i>Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resource does not take place.”</i></p> <p>This wording is required to be inserted into the following policies HV06/A, NW16, BLA01/B and should also be used in policies C22/4, HV01/C, ST04/A, ST19/B and MUN03/A instead of the policy wording on mineral safeguarding used in the consultation document.</p>
Officer Response	Comments noted. Agree to consider modification and amend as necessary. See modification schedule.
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC541
Response Date	18/12/2024 15:03:00
Full Name	Sarah Luff
Organisation	Norfolk County Council (Lead Local Flood Authority)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>The LLFA note that the sites that have been put forward as part of this review (referred to as Group A sites) are those sites which have been previously assessed through the Local Plan's Site Assessment Process and considered suitable for development but were not identified for allocation for reasons such as there being more sites than needed at the time for that specific settlement or, a different site in the same location provided better opportunities for community benefit.</p> <p>Please note that of the potential sites put forward as part of this consultation, a GIS shapefile has not been provided to the LLFA for one site (F05, Land between Holt and Greenway Lane, Fakenham) and as such this site has not been reviewed as part of this consultation. It is however noted that NNDC have since deemed this site unsuitable for inclusion.</p> <p>A comprehensive review of the remaining sites has been produced is attached, document title Appendix 2 FW2024_0840 – LLFA Response – Sites Review (Excel).</p> <p>Please note the LLFA's response is specific to surface water flood risk. No other sources of flood risk (including but not limited to fluvial and coastal flooding; flooding from artificial sources; groundwater flooding and sewer flooding) have been reviewed as part of this consultation.</p> <p>The following criteria have been used in our review, see appendix 2:</p> <p>Surface Water Flood Risk</p> <ul style="list-style-type: none"> • These have been reviewed for the 3.33%, 1.0% and 0.1% Annual Exceedance Probability (AEP) events for surface water flooding. • Where deemed necessary, site-specific comments have been provided. • Assessment of onsite flood risk is proportionate to the site size and the flood risk significance. <p>Reports of Internal and Anecdotal (inclusive of external) Flooding</p> <ul style="list-style-type: none"> • Reviewed with the LLFAs current flood records (which date back to 2011). • Onsite and flood records within 500m of the site boundary have been reported. • Please note all external flood records are deemed to be anecdotal. <p>Watercourses</p> <ul style="list-style-type: none"> • These have been reviewed and identified when onsite or within 100m proximity to the site boundary. • If a watercourse does not fall within the provided site boundaries (even if it is on the edge of the site boundary) this has been classed as offsite. • Watercourses have been defined (ordinary watercourse, main river etc) • We have not defined the ownership of the watercourses in this assessment. • We have not reviewed offline watercourses, blind ditches or pond features as part of this review. Further investigation will be needed to assess these features, their type and whether they are connected to the wider drainage network. • We have not defined whether the features are obstructed by housing or roads etc. <p>Surface and Foul Water Sewer Systems</p> <ul style="list-style-type: none"> • Reviewed against Anglian Water Services sewer mapping. • Both onsite and offsite surface water sewers with 100m of the site boundary have been reported. • We have not defined whether the features are obstructed by housing or roads etc. <p>Additional Information</p> <ul style="list-style-type: none"> • Source Protection Zones (SPZs) (If applicable)

	<ul style="list-style-type: none"> • Internal Drainage Boards (IDBs) (If applicable) <p>We have then reported:</p> <ol style="list-style-type: none"> 1. Would local flood risk/surface water drainage constraints be severe enough to prevent development of the site? 2. Recommendations ranging from standard information required at planning through to requiring review and potential removal if deemed appropriate. <p>Where appropriate, we have provided additional site-specific comments. For ease of use, we have produced a traffic light system based on the recommendations column:</p> <ul style="list-style-type: none"> • Red - Recommend a review of the site and potential removal from the local plan. • Orange - Significant information required at the planning stage. • Green - Standard information required at the planning stage.
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	<p>Appendix 2 FW2024_0840 – LLFA Response – Sites Review (Excel).xlsx</p>
<p>Officer Summary</p>	<p>A comprehensive review of the remaining sites has been produced is attached to this representation, document title Appendix 2 FW2024_0840. LLFA's response is specific to surface water flood risk. No other sources of flood risk (including but not limited to fluvial and coastal flooding; flooding from artificial sources; groundwater flooding and sewer flooding) have been reviewed as part of this consultation.</p> <p>The following criteria have been used in our review, see appendix 2:</p> <p>Surface Water Flood Risk</p> <ul style="list-style-type: none"> • These have been reviewed for the 3.33%, 1.0% and 0.1% Annual Exceedance Probability (AEP) events for surface water flooding. • Where deemed necessary, site-specific comments have been provided. • Assessment of onsite flood risk is proportionate to the site size and the flood risk significance. <p>Reports of Internal and Anecdotal (inclusive of external) Flooding</p> <ul style="list-style-type: none"> • Reviewed with the LLFAs current flood records (which date back to 2011). • Onsite and flood records within 500m of the site boundary have been reported. • Please note all external flood records are deemed to be anecdotal. <p>Watercourses</p> <ul style="list-style-type: none"> • These have been reviewed and identified when onsite or within 100m proximity to the site boundary. • If a watercourse does not fall within the provided site boundaries (even if it is on the edge of the site boundary) this has been classed as offsite. • Watercourses have been defined (ordinary watercourse, main river etc) • We have not defined the ownership of the watercourses in this assessment. • We have not reviewed offline watercourses, blind ditches or pond features as part of this review. Further investigation will be needed to assess these features, their type and whether they are connected to the wider drainage network. • We have not defined whether the features are obstructed by housing or roads etc. <p>Surface and Foul Water Sewer Systems</p> <ul style="list-style-type: none"> • Reviewed against Anglian Water Services sewer mapping. • Both onsite and offsite surface water sewers with 100m of the site boundary have been reported. • We have not defined whether the features are obstructed by housing or roads etc. <p>Additional Information</p> <ul style="list-style-type: none"> • Source Protection Zones (SPZs) (If applicable) • Internal Drainage Boards (IDBs) (If applicable) <p>We have then reported:</p> <ol style="list-style-type: none"> 1. Would local flood risk/surface water drainage constraints be severe enough to prevent development of the site? 2. Recommendations ranging from standard information required at planning through to requiring review and potential removal if deemed appropriate. <p>Where appropriate, we have provided additional site-specific comments. For ease of use, we have produced a traffic light system based on the recommendations column:</p> <ul style="list-style-type: none"> • Red - Recommend a review of the site and potential removal from the local plan. • Orange - Significant information required at the planning stage.

	<ul style="list-style-type: none"> • Green - Standard information required at the planning stage. <p>Summary of findings within attached document, Appendix 2:</p> <p>The site was rated as Green in the RAG rating system and the standard information on surface water flooding will be required at the planning application stage.</p>
Officer Response	Comments noted. The LLFA will also be consulted on as part of any future application on site. The site-specific policy includes requirements to the implementation of a surface water management plan that ensures there is no adverse effects on European sites and greenfield run-off rates are not increased. This is in addition to other requirements in the policy that require a foul drainage strategy to be undertaken and the provision of enhancements to sewerage infrastructure prior to the first occupation of any dwellings.
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC567
Response Date	18/12/2024 15:03:00
Full Name	Richard Doleman
Organisation	Principle Infrastructure Development Planner Norfolk County Council (Highways)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>No objection subject to the following changes to the proposed policy C22/4: ‘Unless alternative routes are agreed by the Local Planning Authority in consultation with the Highway Authority, †The provision of a new segregated cycle/pedestrian footway along the Norwich Road including a dedicated footbridge (or suitable alternative) crossing over the railway.</p> <p>The submission, approval and implementation of a Transport Impact Assessment, to be publicly consulted on, to include analysis of the impact of the development on the local road transport networks, including during construction, and to identify the mitigation and solutions that may be required.’</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>No objection subject to the following changes to the proposed policy C22/4: ‘Unless alternative routes are agreed by the Local Planning Authority in consultation with the Highway Authority, †The provision of a new segregated cycle/pedestrian footway along the Norwich Road including a dedicated footbridge (or suitable alternative) crossing over the railway.</p> <p>The submission, approval and implementation of a Transport Impact Assessment, to be publicly consulted on, to include analysis of the impact of the development on the local road transport networks, including during construction, and to identify the mitigation and solutions that may be required.’</p>
Officer Response	Comments noted. Agree in part to consider modification and amend as necessary. See modification schedule. Disagree with amendments to Criterion 1 of the policy – this is a modification already agreed and carried over from earlier hearings in March 2024. The Council will continue to engage with the Highway Authority and have done so throughout the Local Plan process however, the principle of the provision of the footbridge has already been discussed through the previous hearing sessions undertaken in January-March 2024 and through engagement between the three relevant parties. The Council consider the current iteration of the policy wording to be suitable in ensuring that potential alternatives are considered appropriately by the Council and the Highway Authority.
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC571

Response Date	18/12/2024 15:03:00
Full Name	Paul Harker
Organisation	Place Planning Manager Norfolk County Council (Childrens Services)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	RAG Status = Amber Impact on School Estate/Transport Proximity/Capacity to develop schools: If this site was extended by a further 100 dwellings it would put additional pressure from this site on both primary and secondary phase schools. The site is within 2 miles of the local schools. Depending upon the build out rate of the development we would need to expand the junior school to meet demand and seek developer contributions. some expansion work at the schools may be required if child yield outstrips the current rate of decline in population. It is likely this development could require school transport to get children to the nearest school. Any contributions required to mitigate this development, if the site comes forward, would be sought in response to the planning application.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	RAG Status = Amber Impact on School Estate/Transport Proximity/Capacity to develop schools: If this site was extended by a further 100 dwellings it would put additional pressure from this site on both primary and secondary phase schools. The site is within 2 miles of the local schools. Depending upon the build out rate of the development we would need to expand the junior school to meet demand and seek developer contributions. some expansion work at the schools may be required if child yield outstrips the current rate of decline in population. It is likely this development could require school transport to get children to the nearest school. Any contributions required to mitigate this development, if the site comes forward, would be sought in response to the planning application.
Officer Response	Comments noted. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.
Section	Proposed Change 2 - New Site Allocation: Land West of Pine Tree Farm, Cromer (C22/4)
ID	FC583
Response Date	19/12/2024 12:03:00
Full Name	Gemma Clark
Organisation	Higher Officer, Sustainable Development, Norfolk Coast and Marine Team Natural England
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILES Impacts to National landscapes Within the Norfolk Coast National Landscape A Landscape Strategy or Landscape Visual Impact Assessment (LVIA) will be required to provide a buffer and to develop or help integrate development into the landscape and minimise visual impact. Further advice on landscapes is in Annex 3 Nutrient neutrality Close to the Bure Broads and Marshes Nutrient Neutrality catchment area, and therefore foul and surface water may need to consider Nutrient Neutrality as part of a planning application. This depends on which wastewater treatment works the foul water from the development is treated by.

	<p>BMV Agricultural land Unspecified</p> <p>Recreational disturbance and other issues Contributions to GIRAMS included in the policy There is provision for 4.9 hectares of multi-functional open space together with measures for its on-going maintenance as well as biodiversity improvements to Beckett's Plantation.</p> <p>Could increase recreational disturbance to nearby Felbrigg Woods Site of Special Scientific Interest (SSSI) which is within a short distance from the proposed development. The provision of mitigation measures outlined in Annex 1 should be included to alleviate some of the pressure to designated sites.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	<p>Natural England - Annex 1.pdf Natural England - Annex 3.pdf</p>
Officer Summary	<p>Within the Norfolk Coast National Landscape A Landscape Strategy or Landscape Visual Impact Assessment (LVIA) will be required to provide a buffer and to develop or help integrate development into the landscape and minimise visual impact. Further advice on landscapes is in Annex 3.</p> <p>Close to the Bure Broads and Marshes Nutrient Neutrality catchment area, and therefore foul and surface water may need to consider Nutrient Neutrality as part of a planning application. This depends on which wastewater treatment works the foul water from the development is treated by.</p> <p>Agricultural land unspecified.</p> <p>Contributions to GIRAMS included in the policy There is provision for 4.9 hectares of multi-functional open space together with measures for its on-going maintenance as well as biodiversity improvements to Beckett's Plantation.</p> <p>Could increase recreational disturbance to nearby Felbrigg Woods Site of Special Scientific Interest (SSSI) which is within a short distance from the proposed development. The provision of mitigation measures outlined in Annex 1 should be included to alleviate some of the pressure to designated sites.</p>
Officer Response	<p>Comments noted. The site-specific policy includes mitigation requirements to offset the site's potential impact on the National Landscape. The Council provided a detailed response to the need to provide growth within the National Landscape and this is set out in the Council's Matter 5 Statement (EH011(a)(i)). A detailed site-specific assessment of the site's impact on the National Landscape is available to view in the Additional Sites Review Background Paper Appendix 1, the conclusion of which is that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape. An LVIA may be undertaken through the application process as expressed in Policy ENV2 of the Local Plan.</p> <p>The site is not within the Bure Broads and Marshes Nutrient Neutrality catchment area. There is significant headroom exists in Cromer to accommodate future growth. The draft DWMP states the long-term strategy i.e. beyond the Local plan period of increasing WRC capacity by ensuring a 10% reduction in surface water entering the network.</p> <p>The site lies within Grade 2 agricultural land and also Grade 2, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. Cromer is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local</p>

Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.

No proposed modifications or specific wording provided in Annex 1. The site-specific policy includes mitigation measures as identified via ongoing consultation with Natural England throughout the Local Plan process.

Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)

Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC2
Response Date	07/11/2024 15:28:13
Full Name	Mrs Tanya Adams
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	No, the Local Plan whilst considering its defined areas, needs to consider the quality of life and the environment for those in the area or moving to the area. The land on Mundesley Road is an important part of the working countryside and provides a valuable ecosystem for the area. It is bordered on one side on one side by Little London Road, which even when currently surrounded by land and crops, is flooded on multiple times throughout the year, making it impassable on foot, to build on this area would increase the flood risk in the area. It also provides a natural barrier from artificial night light and noise from the town to the natural wildlife habitat of the canal and Pigneys Wood, allowing the area to flourish which is essential for the environment. At the top of Acorn Road and around the field, we have bats, again essential for the ecosystem.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: The land on Mundesley Road is an important part of the working countryside and provides a valuable ecosystem for the area. It is bordered on one side on one side by Little London Road, which even when currently surrounded by land and crops, is flooded on multiple times throughout the year, making it impassable on foot, to build on this area would increase the flood risk in the area. At the top of Acorn Road and around the field, we have bats, again essential for the ecosystem.
Officer Response	Comments noted. The site-specific policy includes the requirement for a Surface Water Management Plan to demonstrate that greenfield run off rates from the site are not increased. The policy also includes a requirement for a Foul Drainage Strategy that will provide details of any enhancements and set out how additional foul flows will be accommodated within the foul sewerage network, this will be delivered prior to the occupation of any dwellings. Built development will not be located immediately adjacent to Little London Road.
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC4
Response Date	08/11/2024 16:07:20
Full Name	Mr Paul Heinrich
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILE This response relates specifically to: <ul style="list-style-type: none"> Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16) <ol style="list-style-type: none"> A detailed paper relating to this proposal is attached as a pdf. The proposed change has NOT been positively prepared being rushed and against previous evaluations of the site.

3. While effective in meeting the unreasonable demand for more housing than is actually needed to meet local needs (as opposed to those of incomers) there is no need for additional housing in North Walsham given the currently permissioned developments on Norwich Rd and Station Rd together with the North Walsham Sustainable Urban Extension already agreed and accepted.
4. Adding a further 330 wellings to North Walsham when over 2200 are already planning cannot be justified - the infrastructure of the town cannot cope.
5. While noting that national policy is to build regardless of local needs, local infrastructure, water and power supplies this is not an acceptable approach in a rural area, especially one constrained by coast, The Broads, high value landscape, high quality farmland and problems with nutrient neutrality issues.
6. The proposal of this site appears to be at the behest of developers despite the fact that the site was rejected earlier in the planning process and the revised evaluation put forward at Reg 19 consultation was inaccurate and demonstrated a lack of understanding of the pedestrian and vehicular traffic flows to key education, shopping and health services that would result from development of this site.
7. Access to the site is poor - Acorn Rd to the east is a narrow estate road with many parked vehicles and poor visibility at its junction with Bacton Road.
8. The now cul-de-sac at the top of Mundesley Rd has been a quiet residential street for over 30 years and is not suitable to sustain another 700+ vehicle movements per day.
9. It is understood that access might be provide via a new bridge over the railway cutting connecting to the B1145 with a roundabout. The cost of this raises serious questions regarding the viability of the site and thus the provision of a significant volume of affordable dwellings.
10. The position of a roundabout on what is a fast, straight road to the south, immediately followed to the north by a steep slope down to the Ant valley and bends over two narrow 19th century canal bridges has not been thought through as regards highway safety.
11. The site is not well located for access to education facilities, the town centre and the currently inadequate medical facilities. Walking routes to the nearest primary school are unsuitable and involve several road crossings thus children would likely be driven to school so adding to already considerable congestion both at the schools and surrounding streets. Similarly with access to the main supermarkets, doctors surgeries, the Travel Hub and railway station.
12. There is currently no public transport serving the area nor is any expected thus most journeys will be by car and thus could be deemed unsustainable.
13. A 2017 proposal for the site suggested that 45% of the dwellings would be 'affordable'. Whilst the previous and unacceptable access to the site may have made this viable it appears unlikely that this level of critically needed affordable homes would be viable given the cost of a bridge and roundabout to access the site. This further contributes to the site being unacceptable.
14. The site may be close to the industrial estate. However, this does NOT mean that jobs are available locally and those that are will largely be unskilled and semi-skilled in nature, there being no or very few professional level jobs. The skilled and professional jobs lie in Norwich and despite the rail and bus links will lead to a considerable increase in traffic both along the by-pass and along the congested Norwich Road. There is the further consideration concerning pushing extra traffic through Coltishall to the south.
15. The highways management proposals for North Walsham West were based on the impact of that development. They do not take account of increased use of the traffic lighted junctions between the by-pass and Cromer Rd or Norwich Rd. Inclusion of this site negates a significant part of that study.
16. Who are these new dwellings for? Census data shows only a small increase in the population of the District as a whole over the last 10+ years, a modest 1500 or so. Assuming that this rate of growth continues then any increase in development beyond that originally proposed cannot be justified. The requirement is for affordable rented accommodation for local people stuck on housing waiting lists. These should be the priority not high-end houses for incomers.
17. Additional issues concern the loss of high-grade agricultural land at a time when food production needs to increase, potential environmental damage to the sensitive landscape of the Ant valley and potential loss of biodiversity given the proximity of the site to the Pigney's Wood nature reserve.

Do you consider it necessary to participate in a public hearing Yes

<p>session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	<p>As District Councillor for the Ward in which this site is located I felt it essential to represent the people of the Ward and the wider town to ensure that all concerns are fully considered in public.</p>
<p>File (where submitted)</p>	<p>NW16 - the case against.doc (1)</p>
<p>Officer Summary</p>	<p>Object: The proposed change has NOT been positively prepared being rushed and against previous evaluations of the site. While effective in meeting the unreasonable demand for more housing than is actually needed to meet local needs (as opposed to those of incomers) there is no need for additional housing in North Walsham given the currently permitted developments on Norwich Rd and Station Rd together with the North Walsham Sustainable Urban Extension already agreed and accepted. a further 330 dwellings to North Walsham when over 2200 are already planning cannot be justified - the infrastructure of the town cannot cope.</p> <p>site appears to be at the behest of developers despite the fact that the site was rejected earlier in the planning process and the revised evaluation put forward at Reg 19 consultation was inaccurate and demonstrated a lack of understanding of the pedestrian and vehicular traffic flows to key education, shopping and health services that would result from development of this site. Access to the site is poor - Acorn Rd to the east is a narrow estate road. access might be provide via a new bridge over the railway cutting connecting to the B1145 with a roundabout. The cost of this raises serious questions regarding the viability of the site.</p> <p>The site is not well located for access to education facilities, the town centre and the currently inadequate medical facilities. here is currently no public transport serving the area nor is any expected thus most journeys will be by car. The skilled and professional jobs lie in Norwich and despite the rail and bus links will lead to a considerable increase in traffic both along the by-pass and along the congested Norwich Road. There is the further consideration concerning pushing extra traffic through Coltishall to the south. The highways management proposals for North Walsham West were based on the impact of that development. They do not take account of increased use of the traffic lighted junctions between the by-pass and Cromer Rd or Norwich Rd. Inclusion of this site negates a significant part of that study. any increase in development beyond that originally proposed cannot be justified.</p> <p>The requirement is for affordable rented accommodation for local people stuck on housing waiting lists. potential environmental damage to the sensitive landscape of the Ant valley and potential loss of biodiversity given the proximity of the site to the Pigney's Wood nature reserve.</p>
<p>Officer Response</p>	<p>Comments noted.</p> <p>The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the Districts existing and future identified needs for all types of development over the Plan period. North Walsham is identified as a Large Growth Town in Policy SS1 and as such is where a higher proportion of new housing will be located. Locations such as these have primary, secondary education, healthcare facilities and large town centres which coupled with the extensive choice of convenience and comparison good shopping, good public transport (including direct rail links) and being the focus for commercial and employment investment perform a strong role as service centres and employment providers. As such the identified Large Growth Towns remain the most sustainable settlements and locations where growth should be directed.</p> <p>The initial HELAA assessment undertaken in 2017 identifies the site as unsuitable based on its impacts on the wider road network. The site's access and other factors were considered suitable at the time. The HELAA assesses sites individually and is a high-level desktop study that informed the early plan process and the districts capacity for residential development, it does not identify allocations and is not the full assessment that informed the Local Plan (this is found in Exam Doc, D3 & Appendix 1 of the Additional Sites Review Background Paper). The full site assessment process is explained in Background paper 6 - Development Site Selection Methodology [Examination Reference C6]. Assessment of the site as expressed in the Site Assessment Booklet (D3) concludes the site is suitable but not taken further as it was not required at the time. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider network can be mitigated (See exam docs, D19 & EH011e).</p> <p>The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. No vehicular access is being provided via Acorn Road - this access is pedestrian/cycle only. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. The site-specific policy includes the mitigation and enhancement</p>

	of the County Wildlife Site and existing mature trees and hedgerows, the site will also be required to provide Open Space in compliance with Local Plan Policy.
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC6
Response Date	08/11/2024 16:07:13
Full Name	Mrs Sophia Jackman
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am not happy about the proposed change no.3 (development on Mundesley Road). The access to the development would cause many problems. Already the traffic on Lingate Road is at capacity and often gets congested. Another few thousand cars would not work. Also I feel that many cars would cut through the acorn estate and Swafield Rise leading to more problems.</p> <p>Many cars park along the end of Mundesley road to use the Paston Way walk and therefore any through traffic will cause congestion on this narrow carriage way. There is plenty of scope to build on the west side of town with better access links.</p> <p>I strongly oppose this proposed change and urge you not add it to the local plan.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	I would like to oppose this in person
File (where submitted)	
Officer Summary	Object: The access to the development would cause many problems. Already the traffic on Lingate Road is at capacity and often gets congested. Also I feel that many cars would cut through the acorn estate and Swafield Rise leading to more problems. Many cars park along the end of Mundesley road to use the Paston Way walk and therefore any through traffic will cause congestion on this narrow carriage way.
Officer Response	Comments noted. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. No vehicular access is being provided via Acorn Road - this access is pedestrian/cycle only.
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC9
Response Date	10/11/2024 18:55:00
Full Name	Mr Andy Coghlan
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I reject the plans to build these houses.</p> <p>The site is not suitable.</p> <p>We would lose farmland and green countryside.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	

If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: Site is not suitable. Loss of agricultural land
Officer Response	Comments noted. Assessment of the site as expressed in the Site Assessment Booklet in the Local Plan's Examination Library (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Further assessment of the site is provided in Appendix 1 of the Additional Sites Review Background Paper.
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC10
Response Date	10/11/2024 20:43:39
Full Name	Ms Jo Whitehouse
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	No: This site is a greenfield site located on the northeast edge of North Walsham. Why are we building again on green sites? The traffic - where is the amount of traffic going to go on Mundesley Road. The road is already a cut through road from Mayfield Way, Swaffield Way and the other roads, running through to the Bacton road. This area is now a fast cut through. With more houses being built, the cars will cut through to get onto the Bacton road. Mundesley road will just become more of a hazard. The shop at the junction of Mundesley road and the small road to the Bypass is a cut through and cars speed up and down there.
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: This site is a greenfield site. The road is already a cut through road from Mayfield Way, Swaffield Way and the other roads, running through to the Bacton road. This area is now a fast cut through.
Officer Response	Comments noted. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application.
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC12
Response Date	21/11/2024 18:41:36
Full Name	Mr Richard Kerfoot
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	Vehicular access to this proposed site via Acorn Road would cause considerably more congestion than currently experienced. With on road parking this causes obstacles and chicanes for current homeowners so a potential rise of 500 vehicles would be calamitous.

	<p>Vehicular access via Mundesley Road would be preferable however current traffic flow at the junction with Lyngate Road and visitors to the Premier Shop, together with Sainsburys HGV's and the majority of buses (double and single decker) using this junction is not workable.</p> <p>The Acorn Road estate and Swafield Rise area form a natural barrier between Urban and Rural areas. Wildlife is prominent in the area and the field is known to flood in the NE section, Also current works in progress for power cable to cross corner of the field.</p> <p>Several years ago this site was deemed "Not Suitable" so what has changed to make the site "Suitable"</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: Vehicular access to this proposed site via Acorn Road would cause considerably more congestion than currently experienced. Vehicular access via Mundesley Road would be preferable however current traffic flow at the junction with Lyngate Road and visitors to the Premier Shop, together with Sainsburys HGV's and the majority of buses (double and single decker) using this junction is not workable. Several years ago this site was deemed "Not Suitable" so what has changed to make the site "Suitable"</p>
Officer Response	<p>Comments noted. The initial HELAA assessment undertaken in 2017 identifies the site as unsuitable based on its impacts on the wider road network. The site's access and other factors were considered suitable at the time. The HELAA assesses sites individually and is a high-level desktop study that informed the early plan process and the districts capacity for residential development, it does not identify allocations and is not the full assessment that informed the Local Plan (this is found in Exam Doc, D3 & Appendix 1 of the Additional Sites Review Background Paper). The full site assessment process is explained in Background paper 6 - Development Site Selection Methodology [Examination Reference C6]. Assessment of the site as expressed in the Site Assessment Booklet (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider network can be mitigated (See exam docs, D19 & EH011e). Assessment of the site as expressed in the Site Assessment Booklet in the Local Plan's Examination Library (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Further assessment of the site is provided in Appendix 1 of the Additional Sites Review Background Paper.</p> <p>No vehicular access is being provided via Acorn Road - this access is pedestrian/cycle only.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC13
Response Date	11/11/2024 14:01:21
Full Name	Miss Emily Wylie
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I do not think this should be part of the local plan. There are already 2000 homes being built on the west side of town. The infrastructure and roads will not cope with the extra people and cars. Any further buildings should be in the surrounding villages. This piece of land is a greenfield site and should be kept that way. A loss of farmland and country side will be detrimental to the town. Please DO NOT build here.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No

If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: already 2000 homes being built on the west side of town. The infrastructure and roads will not cope with the extra people and cars. Any further buildings should be in the surrounding villages. This piece of land is a greenfield site
Officer Response	Comments noted. The site-specific policy for NW62/A includes requirements for improvements to the wider road network and assessments for its impacts. The Local Plan includes a strategy for growth in Policy SS1 for all tiers of the Settlement Hierarchy, including Small Growth Villages.
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC15
Response Date	11/11/2024 15:32:18
Full Name	Mr Bruce Lindon
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>The same arguments apply to the proposed change that the inspector referred to in his report i.e highway concerns regarding the junctions at the Cromer road traffic lights and the Norwich road traffic lights, also the junction at Mundesley road and Lyngate road is often heavily congested and potentially dangerous,</p> <p>There are already problems at Coltishall and Horstead caused by traffic accessing the Norwich road and potentially Wroxham bridge would be impacted.</p> <p>Surface water management, the river Ant flows into the Ant broads the site of an SSSI and being the best example of an unpolluted valley fen in western Europe, can nutrient neutrality be guaranteed?</p> <p>There is no mention of the windfarm cables which will traverse the site.</p> <p>The site has already been rejected as unsuitable.</p> <p>There is no mention of local facilities, I already have to wait 5 weeks for a doctors appointment.</p> <p>There is no guarantee of affordable housing.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: same arguments apply to the proposed change that the inspector referred to in his report i.e highway concerns regarding the junctions at the Cromer road traffic lights and the Norwich road traffic lights, also the junction at Mundesley road and Lyngate road is often heavily congested. There are already problems at Coltishall and Horstead caused by traffic accessing the Norwich road and potentially Wroxham bridge would be impacted. Surface water management, the river Ant flows into the Ant broads the site of an SSSI. There is no mention of the windfarm cables which will traverse the site. The site has already been rejected as unsuitable. no mention of local facilities. No guarantee of affordable housing.
Officer Response	Comments noted. The Inspector's initial letter dated July 2024 does not reference this site and only makes reference to NW62/A. No comments were raised regarding highways impacts in areas of North Walsham not immediately affected by NW62/A. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. Nutrient Neutrality mitigation is not required for sites in North Walsham as described in the assessment of NW16 in Appendix 1 of the Additional Sites Review Background Paper.

	The site-specific policy and site design take into account the presence of offshore wind infrastructure works. Assessment of the site as expressed in the Site Assessment Booklet in the Local Plan's Examination Library (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Further assessment of the site is provided in Appendix 1 of the Additional Sites Review Background Paper. Affordable housing is required by policy.
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC16
Response Date	11/11/2024 21:02:46
Full Name	Mrs Clare Sturgess
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	This Parcel of land is green land and not suitable for more housing. The area is countryside and is going to seriously impact on wildlife and habitat around the quiet lanes of north Walsham and the canal . This part of the town of north Walsham has remained untouched and a beautiful part of our town for many years and will be encroached upon . People visit this area because of the tranquility and helps will wellbeing of many local people including many dog walkers. It would be a great shame to spoil another unspoiled area . Please listen to the local people who matter .
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	I am a local resident of the area and do not want this to go ahead. I want to protect this area for future generations.
File (where submitted)	
Officer Summary	Object: Parcel of land is green land and not suitable for more housing. area is countryside and is going to seriously impact on wildlife and habitat around the quiet lanes. People visit this area because of the tranquility and helps will wellbeing of many local people.
Officer Response	Comments noted. Assessment of the site as expressed in the Site Assessment Booklet in the Local Plan's Examination Library (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. The site-specific policy includes the mitigation and enhancement of the County Wildlife Site and existing mature trees and hedgerows, the site will also be required to provide Open Space in compliance with Local Plan policy.
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC20
Response Date	12/11/2024 12:36:17
Full Name	Mrs Anne Hodds
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	I appreciate the need for additional housing BUT PLEASE consider the lack of current infrastructure and facilities available in North Walsham and its surrounding area. I refer mainly to the medical facilities; both Doctors Surgeries are stretched to capacity and they struggle to maintain a service as is required to meet the needs of the community. When trying to gain an appointment it is the norm to wait generally in excess of 4+ weeks, and let's be honest when you have need to see a doctor it's not something that can usually wait that long. Do not offend me by laying the blame for this current situation on the last Government and the "empty" pot. I've lived in North Walsham for some 30 years and seen housing increase but have seen no real changes to our Surgeries to accommodate this. And of course we

	have the traffic congestion which will increase. Until these issues and other key issues are sensibly addressed how can you consider building new houses.
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: Lack of current infrastructure and facilities available in North Walsham and its surrounding area. Doctors Surgeries are stretched to capacity and they struggle to maintain a service as is required to meet the needs of the community. Traffic congestion which will increase.
Officer Response	Comments noted. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application.
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC26
Response Date	12/11/2024 16:17:00
Full Name	Mr Dominic Lewis
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	The proposed new site NW16 should not be developed for housing. The access to the site will be difficult for pedestrians and cyclists, being remote to the town centre. This will increase car use. The field itself is a significant part of the easily accessible green spaces and this will compromise the natural beauty of the area. Views from those houses on Swafield Rise which enjoy the view will be compromised. There are significant developments around North Walsham that this one is not necessary in order to improve the supply of housing. Nor is there sufficient indication that this site will offer affordable housing to the local people.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: access to the site will be difficult for pedestrians and cyclists, being remote to the town centre. The field itself is a significant part of the easily accessible green spaces and this will compromise the natural beauty of the area. There are significant developments around North Walsham that this one is not necessary in order to improve the supply of housing.
Officer Response	Comments noted. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. No vehicular access is being provided via Acorn Road - this access is pedestrian/cycle only.

	The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. The Inspector's response to the Local Plan (July 2024 EH006(f)) states the submitted Plan has a shortfall of housing provision and the Council are seeking to provide additional allocations to help mitigate this shortfall and meet the revised objectively assessed needs.
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC28
Response Date	12/11/2024 19:58:31
Full Name	Mrs Kate Leith
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	The argument about the need for additional houses does not seem sound, unless these are AFFORDABLE HOMES FOR EXISTING RESIDENTS. Given the population of the district as a whole only increased by 1,500 from 2011-2021 (census data), and North Walsham alone is already committed to building over 2,200 new homes, how can the Planning Inspector justify his demand that our town agrees to a further 330 dwellings? Residents here already struggle to get a doctor's or dentist's appointment, roads are often gridlocked - especially Mundesley Road and Lyngate Road. Acorn Road is a narrow residential street with many parked cars meaning it is effectively a single lane. Any more traffic on these roads will be intolerable for local residents.
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: the need for additional houses does not seem sound, unless these are AFFORDABLE HOMES FOR EXISTING RESIDENTS. Residents here already struggle to get a doctor's or dentist's appointment, roads are often gridlocked - especially Mundesley Road and Lyngate Road. Acorn Road is a narrow residential street with many parked cars.
Officer Response	Comments noted. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. No vehicular access is being provided via Acorn Road - this access is pedestrian/cycle only. The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. The Inspector's response to the Local Plan (July 2024 EH006(f)) states the submitted Plan has a shortfall of housing provision and the Council are seeking to provide additional allocations to help mitigate this shortfall and meet the revised objectively assessed needs.
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC29
Response Date	13/11/2024 13:24:43
Full Name	Mr Mark Cracknell
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	Access via a new roundabout from B1145 North Walsham bypass is proposed. This is a positive change as it will help to alleviate the huge congestion that builds up at the junction of Mundesley Road and Lyngate Road due in large part to on street parking on Lyngate Road. My question is, how will the considerable cost of this be funded? If it is only being built to

	facilitate the construction of the new housing, I believe that the Developers should bear the cost ideally in full or at worst make a sizeable contribution.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Support: Access via a new roundabout from B1145 North Walsham bypass is proposed. This is a positive change as it will help to alleviate the huge congestion that builds up at the junction of Mundesley Road and Lyngate Road due in large part to on street parking on Lyngate Road.
Officer Response	Support noted. Provision of the a suitable access is required by the site-specific policy, financial contributions can be sought through the application process.
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC32
Response Date	05/12/2024 11:53:17
Full Name	mrs Maria Forsdick
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Land at the end of Mundesley road NW16</p> <p>This site has been rejected for good reasons.Further developement in North Walsham can not be justified as there are already more homes being built on the west side development than there are people on the housing list for North Walsham. The population change data over the last 10 years does not support further housing developement beyond that which is already planned and agreed.The new developement would be unnecessary housing.</p> <p>North Walsham is not a small village that needs to be grown it is the biggest town in North Norfolk.But the town centre is small it is a unique market town,with unique shops apart from the supermarkets .It is already surrounded by many houses. There are no department stores.or pub and restaurant chains,or fast food chains and no large DIY stores. It is a beautiful norfolk town it is just how all the people who live here like it ,it is not like the towns around the outskirts of London .There is a fantastic community, that helps each other out,but once you make a town too big you tend to lose this and change the town forever.</p> <p>The roads in North walsham are small and narrow on this side of the town and are not large enough to take the extra traffic that this developement would produce if it was built,with the amount of houses proposed that could be another 660 vehicles on already busy but small roads.roads like Lyngate road,Acorn road, Mundesley road, ,Crow road,Bacton road,the B1145 and the A149,this amount of traffic will grid lock our town and cause more accidents.It would also exacerbate the traffic problems in Coltishall.which has a major traffic problem already,as it is a small village on the most direct route to Norwich from North Walsham.</p> <p>The developers are also going to have problems with provision of acceptable access this reduces the viability of the site with potential lose of essential affordable housing for local people.both of the proposed access points Mundesley road and Acorn road are not viable.</p> <p>There are no viable walking routes to and from schools health care and shops more car use will be required.As public transport is not available and it is a long way away from the railway station.</p> <p>The increase of people will have a negative impact on our schools ,doctors and dentists . The nearest school in Manor road has a limited amount of spaces the new west side developement has a primary school being built but no secondary school.</p> <p>Our doctors surgeries who at the moment manage our population well by using,doctors assistants and nurse practitioners to manage the emergency appointments.they are amazing by the way as are the doctors.But it does take 3-4 weeks to get an appointment with a doctor now and that is before the west side developement is built.</p>

Our dentists have no NHS places available and it has taken me four years to find a local dentist with spaces for private patients .I have my first appointment next week. There are many people who don't have a dentist.

There are few local jobs available so this would increase commuting usually by car through North Walsham and Coltishall.

This development would also cause previous highways studies for north Walsham west and associated mitigations would require considerable revision and potential costs

Is there enough water supply for all these houses?Is the surface water going to flood the houses that are already here.?The field and the road already get waterlogged at times of heavy rain fall . Is the surface water going to polute and damage the canal,that is near by?If more water than nature can supply is needed what will happen to our waterways?

The suggested development would be built on high grade farm land needed for food production.and is also Green land .Beautiful countryside which is close to a nature reserve Pigneys wood and the Ant marshes and the dilam canal . The development company propose gravity surface water drainage which could put these at risk of polution.The paston way that runs alongside the feild is a lovely country walk that leads to the canal and the woods,if the development goes ahead this would be changed and spoiled.

There is also lot of wild life in the area,although the developers will tell you otherwise they come and look when animals are hibernating or migrating.we have seen deer and foxes and field mice in the field ,there are also badgers,and many wild birds , we have seen buzzards kites, owls and pheasants ,a golden pheasant,chafinches,bull finches in the hedgerows at the side of the feild,have also seen blue tits ,great tits,coal tits ,long tailed tits,gold finches,black birds,rooks,jackdaws ,jays,magpies,robins dunnocks ,sparrows,song thrush,stock doves ,collared doves and a cuckoo and of course the pigeons and sea gulls.Near the canal there are also eagrets and kingfishers.It is wonderful to see them all.In warmer months we also see bats they fly around the street lights in front of our house and through our garden which is opposite the field.I dont know were the bats roost but it must be near by and I also know that it is illeagal in the UK to disturb bats.Another good reason not to develope this land.

I also feel that the quality of life for the residents of North Walsham should be considered , losing our countryside our quite places that are good for our mental health,being surrounded by noisey roads and too many people,traffic chaos and longer waits for health appointments,crowded schools are all bad for the people of North Walsham. please dont use this land for building.

Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: This site has been rejected for good reasons.Futher development in North Walsham can not be justified as there are already more homes being built on the west side development than there are people on the housing list for North Walsham.</p> <p>North Walsham is not a small village that needs to be grown it is the biggest town in North Norfolk.But the town centre is small it is a unique market town,with unique shops apart from the supermarkets .It is already surrounded by many houses. There are no department stores.or pub and restaurant chains,or fast food chains and no large DIY stores. It is a beautiful norfolk town it is just how all the people who live here like it ,it is not like the towns around the outskirts of London.</p> <p>The roads in North walsham are small and narrow on this side of the town and are not large enough to take the extra traffic that this development would produce if it was built,with the amount of houses proposed that could be another 660 vehicles on already busy but small roads.roads like Lyngate road,Acorn road, Mundesley road, ,Crow road,Bacton road,the B1145 and the A149,this amount of traffic will grid lock our town and cause more accidents.</p> <p>The developers are also going to have problems with provision of acceptable access this reduces the viability of the site with potential lose of essential affordable housing for local people.both of the proposed access points Mundesley road and Acorn road are not viable. There are no viable walking routes to and from schools health care and shops more car use will be required.As public transport is not available and it is a long way away from the railway station. The increase of people will have a negative impact on our schools ,doctors and dentists . The nearest school in Manor road has a limited amount of spaces the new west side development has a primary school being built but no secondary school. It does</p>

take 3-4 weeks to get an appointment with a doctor now and that is before the west side development is built. Our dentists have no NHS places available and it has taken me four years to find a local dentist with spaces for private patients.

This development would also cause previous highways studies for north Walsham west and associated mitigations would require considerable revision and potential costs. Is there enough water supply for all these houses? Is the surface water going to flood the houses that are already here? The field and the road already get waterlogged at times of heavy rain fall. Is the surface water going to pollute and damage the canal, that is near by? If more water than nature can supply is needed what will happen to our waterways? The suggested development would be built on high grade farm land needed for food production and is also Green land. Beautiful countryside which is close to a nature reserve Pigneys wood and the Ant marshes and the dilam canal.

There is also lots of wild life in the area. I also feel that the quality of life for the residents of North Walsham should be considered, losing our countryside our quiet places that are good for our mental health, being surrounded by noisy roads and too many people, traffic chaos and longer waits for health appointments, crowded schools are all bad for the people of North Walsham. please don't use this land for building.

Officer Response

Comments noted. The initial HELAA assessment undertaken in 2017 identifies the site as unsuitable based on its impacts on the wider road network. The site's access and other factors were considered suitable at the time. The HELAA assesses sites individually and is a high-level desktop study that informed the early plan process and the districts capacity for residential development, it does not identify allocations and is not the full assessment that informed the Local Plan (this is found in Exam Doc, D3 & Appendix 1 of the Additional Sites Review Background Paper). The full site assessment process is explained in Background paper 6 - Development Site Selection Methodology [Examination Reference C6]. Assessment of the site as expressed in the Site Assessment Booklet (D3) concludes the site is *suitable but not taken further* as it was not required at the time. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider network can be mitigated (See exam docs, D19 & EH011e). Assessment of the site as expressed in the Site Assessment Booklet in the Local Plan's Examination Library (D3) concludes the site is *suitable but not taken further* as it was not required at the time. Further assessment of the site is provided in Appendix 1 of the Additional Sites Review Background Paper.

North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning in Health Protocol. The protocol presents a process describing how relevant NHS organisations, Norfolk & Suffolk County Councils, Public Health and the Norfolk and East Suffolk Local Planning Authorities jointly engage to ensure that health considerations are adequately accounted for in plan making and in planning applications and their subsequent developments so that the appropriate authorities can plan and priorities investment(s). Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.

The site-specific policy includes the requirement for a Surface Water Management Plan to demonstrate that greenfield run off rates from the site are not increased. The policy also includes a requirement for a Foul Drainage Strategy that will provide details of any enhancements and set out how additional foul flows will be accommodated within the foul sewerage network, this will be delivered prior to the occupation of any dwellings. The site-specific policy includes the mitigation and enhancement of the County Wildlife Site and existing mature trees and hedgerows, the site will also be required to provide Open Space in compliance with the Local Plan.

Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC38
Response Date	18/11/2024 13:00:53
Full Name	Mr & Miss C & A Weller & Powles
Organisation	

Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Anyone who has local knowledge of the area knows that the site is not suitable for multiple reasons.</p> <p>Mundesley Road and Lyngate Road are already subject to heavy traffic and congestion. The combination of buses, Sainsbury's lorries, parked cars and a narrow road and junction already cause multiple issues daily. Larger, wider traffic frequently use the pavement. The amount of traffic a new development will create and also the heavy construction traffic just won't work.</p> <p>The area already suffers from an insufficient drainage system. Surface water already overloads the sewers creating foul water flooding.</p> <p>Although we have an industrial estate there are limited employment opportunities.</p> <p>We are a rural town - there are so many issues with all aspects of this plan, as others have already commented, it really should not be allowed to go ahead.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	It is important that the views of local people are put forward as to the viability of the proposal rather than decisions being made in an office miles away from the area.
File (where submitted)	
Officer Summary	Object: Mundesley Road and Lyngate Road are already subject to heavy traffic and congestion. The area already suffers from an insufficient drainage system. Surface water already overloads the sewers creating foul water flooding. Although we have an industrial estate there are limited employment opportunities.
Officer Response	Comments noted. The Highway Authority are content with the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. The site-specific policy includes the requirement for a Surface Water Management Plan to demonstrate that greenfield run off rates from the site are not increased. The policy also includes a requirement for a Foul Drainage Strategy that will provide details of any enhancements and set out how additional foul flows will be accommodated within the foul sewerage network, this will be delivered prior to the occupation of any dwellings.
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC42
Response Date	18/11/2024 21:06:04
Full Name	Mrs Kim Payne
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I feel strongly that this site is unsuitable for development due to a number of factors.</p> <ol style="list-style-type: none"> 1. The doctors surgeries, pharmacies, schools and shopping facilities don't have extensive availability for potentially hundreds of new users. 2. The access to this development, even via the B1145 offers potential problems with bottle necks at Swafield bridge and Cromer Rd traffic lights and huge traffic jams around Lyngate Rd. 3. Surface water drainage, although on a slope to Little London Road, which floods already, provide a significant probability of nitrates entering the Dilham Canal. With has abundant wildlife. There are deer, otters and kingfishers within a quarter of a mile of this proposal.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please	

outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: The doctors surgeries, pharmacies, schools and shopping facilities don't have extensive availability. access to this development, even via the B1145 offers potential problems with bottle necks at Swafield bridge and Cromer Rd traffic lights. Surface water drainage, although on a slope to Little London Road, which floods already, provide a significant probability of nitrates entering the Dilham Canal.
Officer Response	Comments noted. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. The site-specific policy includes the requirement for a Surface Water Management Plan to demonstrate that greenfield run off rates from the site are not increased. The policy also includes a requirement for a Foul Drainage Strategy that will provide details of any enhancements and set out how additional foul flows will be accommodated within the foul sewerage network, this will be delivered prior to the occupation of any dwellings. Nutrient Neutrality mitigation is not required for sites in North Walsham as described in the assessment of NW16 in Appendix 1 of the Additional Sites Review Background Paper. The site-specific policy also includes the mitigation and enhancement of the County Wildlife Site and existing mature trees and hedgerows, the site will also be required to provide Open Space in compliance with Local Plan policy.
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC56
Response Date	19/11/2024 15:08:00
Full Name	Helen Thorne
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	
Officer Response	Comments noted. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. Pedestrian/cycle links will be provided throughout the site that will promote active travel to nearby services. The Council has a Brownfield Register, there are not enough sites on this register to accommodate the required growth needed as set out in Policy SS1 and many potential brownfield sites are unsuitable due to location or other constraints.
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC57

Response Date	20/11/2024 15:59:00
Full Name	Henry & Melanie Macey
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>The principal objection is simply on the grounds of housing capacity.</p> <p>ACCESS</p> <p>The fundamental objection must be access. The B1145, even with the proposed roundabout would increase the danger on the B1145, especially approaching from Swafield. A necessary bridge may, hopefully, be prohibitive due to costs. Added congestion at school-run times will mean increased danger on the roads and the poor pavements.</p> <p>INFRASTRUCTURE & COMMUNITY</p> <p>Water both fresh and drainage. Little London already floods.</p> <p>Schools have limited free space. Dental surgeries are already over-subscribed. Medical centres equally have maximum patients on roll. If new residents are retirees – common in this area - this will be exacerbated.</p> <p>There are no local facilities apart from the excellent Mundesley Rd shop. The Mundesley Rd site is a long way from supermarkets or the town centre where the parking provision has already been reduced. No-one will walk to the town and we require the town to flourish.</p> <p>TRAFFIC</p> <p>330 houses will generate 700 cars; the local roads would be increasingly dangerous especially morning and afternoon. Colitshall cannot cope with more commuters the village and over the bridge.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: The B1145, even with the proposed roundabout would increase the danger on the B1145, especially approaching from Swafield. Added congestion at school-run times will mean increased danger on the roads and the poor pavements. Little London already floods. Schools have limited free space. Dental surgeries are already over-subscribed. Medical centres equally have maximum patients on roll. The Mundesley Rd site is a long way from supermarkets or the town centre where the parking provision has already been reduced. The local roads would be increasingly dangerous especially morning and afternoon Colitshall cannot cope with more commuters the village and over the bridge.</p>
Officer Response	<p>Comments noted. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Opportunities to provide for local infrastructure beyond what is included within the site-specific policy will be explored through the application process.</p> <p>The site-specific policy includes the requirement for a Surface Water Management Plan to demonstrate that greenfield run off rates from the site are not increased. The policy also includes a requirement for a Foul Drainage Strategy that will provide details of any enhancements and set out how additional foul flows will be accommodated within the foul sewerage network, this will be delivered prior to the occupation of any dwellings.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC59
Response Date	19/11/2024 08:11:00
Full Name	Christopher Saul
Organisation	

Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	This development was rejected in 2018 with genuine justification by experts in planning, environment and highways. Nothing has changed since that report with no additional road access, no additional water, drainage or sewage works. The whole project is a money grab of a little piece of land blistered onto the North of North Walsham just for the sake of it . It is currently grade A agricultural land which is in constant production and as a housing estate is strategically and geographically, totally inconvenient for the town and local road networks. Although the residents of the following villages will not thank me, I believe it would be far better to build new houses in: Knapton, Trunch, Worstead, Sco Ruston and Scottow who would benefit from expansion and who already have the basic infrastructure in place and with good road access. Common sense must prevail on this matter.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: development was rejected in 2018 with genuine justification by experts in planning, environment and highways. It is currently grade A agricultural land. believe it would be far better to build new houses in: Knapton, Trunch, Worstead, Sco Ruston and Scottow who already have the basic infrastructure in place and with good road access.
Officer Response	<p>Comments noted. The initial HELAA assessment undertaken in 2017 identifies the site as unsuitable based on its impacts on the wider road network. The site's access and other factors were considered suitable at the time. The HELAA assesses sites individually and is a high-level desktop study that informed the early plan process and the districts capacity for residential development, it does not identify allocations and is not the full assessment that informed the Local Plan (this is found in Exam Doc, D3 & Appendix 1 of the Additional Sites Review Background Paper). The full site assessment process is explained in Background paper 6 - Development Site Selection Methodology [Examination Reference C6]. Assessment of the site as expressed in the Site Assessment Booklet (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider network can be mitigated (See exam docs, D19 & EH011e).</p> <p>Assessment of the site as expressed in the Site Assessment Booklet in the Local Plan's Examination Library (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Further assessment of the site is provided in Appendix 1 of the Additional Sites Review Background Paper. The Local Plan includes a strategy for growth in Policy SS1 for all tiers of the Settlement Hierarchy, including Small Growth Villages. The site lies within Grade 3 and Grade 2 agricultural land. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC60
Response Date	12/11/2024 11:17:00
Full Name	Mr & Mrs Scott & Nadine Vousden
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	I write to you concerning the proposed development of land to the North of North Walsham between Swafield Rise and Little London Lane, your ref:NW16. I wish to object in the strongest terms to this site being of renewed consideration for the following reasons; 1) This is a green field site and in use as arable land. 2) The site is too far from the centre of town without adequate public transport and will inevitably

	<p>cause an increase in the use of cars to access shops and services. 3) Proposal to include homes for the elderly? How are they to gain access to the towns incredibly overstretched health services, this is not within reasonable walking distance of these proposed homes? 4) Severe lack of health services in North Walsham, including dentistry, the current waiting times for “non urgent” appointments now stretching into 4 weeks. You could argue that ALL doctor’s appointments have a relative urgency attached to them? Especially if it is you that is feeling unwell. 5) The opportunities for employment in North Walsham are not good. Where are all these extra people expected to find work, I refer to the 2200 houses in addition to the NW16 site already proposed? If they are to commute into Norwich (where the majority of the jobs paying adequate rates to afford these new houses) this will cause a massive increase to the already congested and inadequate road network. The traffic lights at the railway station on the bypass are a choke point in rush hour as is the residential B1150 Norwich Road leaving town. Then of course there is the strain on the very narrow streets and inadequate bridge crossing the River Bure at Horstead. Further down the line you have the awful queues in rush hour waiting to join or cross the A1270 Broadland Northway (NDR). North Walsham is a difficult town to alleviate congestion in due to the low bridges and railway lines, these choke points cannot be avoided. The limited River Bure crossing points further add to the case for North Walsham (especially to the North of the town) being a poor choice for large scale house building schemes. 6) There is not enough capacity at the towns schools for the extra students coming from the increase in population further development will bring. There has been no suggestion that any public services will be expanded to cope with the increase in demand. I therefore urge the committee to reject this proposal, as it was in 2017, as being a completely unsuitable site for housing.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>Object: This is a green field site and in use as arable land. The site is too far from the centre of town without adequate public transport. How are elderly to gain access to the towns incredibly overstretched health services, this is not within reasonable walking distance of these proposed homes.</p> <p>Severe lack of health services in North Walsham. The opportunities for employment in North Walsham are not good. The traffic lights at the railway station on the bypass are a choke point in rush hour as is the residential B1150 Norwich Road leaving town. North Walsham is a difficult town to alleviate congestion in due to the low bridges and railway lines, these choke points cannot be avoided. There is not enough capacity at the towns schools for the extra students coming from the increase in population further development will bring. I therefore urge the committee to reject this proposal, as it was in 2017, as being a completely unsuitable site for housing.</p>
<p>Officer Response</p>	<p>Comments noted. The initial HELAA assessment undertaken in 2017 identifies the site as unsuitable based on its impacts on the wider road network. The site’s access and other factors were considered suitable at the time. The HELAA assesses sites individually and is a high-level desktop study that informed the early plan process and the districts capacity for residential development, it does not identify allocations and is not the full assessment that informed the Local Plan (this is found in Exam Doc, D3 & Appendix 1 of the Additional Sites Review Background Paper). The full site assessment process is explained in Background paper 6 - Development Site Selection Methodology [Examination Reference C6]. Assessment of the site as expressed in the Site Assessment Booklet (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Evidence provided during the Regulation 18</p>

	<p>consultation and additional evidence provided since then, indicates that the impacts on the wider network can be mitigated (See exam docs, D19 & EH011e).</p> <p>The site-specific policy includes the mitigation and enhancement of the County Wildlife Site and existing mature trees and hedgerows, the site will also be required to provide Open Space in compliance with Local Plan policy. Education capacity information is provided by the Education Authority and financial contributions will be considered through the application process.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC61
Response Date	12/11/2024 11:31:00
Full Name	Mrs Rowena Bowden
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Grounds for objections.</p> <ol style="list-style-type: none"> 1. Previous proposal by Richborough Developments in 2017, to develop this site, was rejected. What were the objections to that proposal and have those reasons been overcome? 2. Statements supporting this proposal state that there are 'good public transport links with both bus and train being available.' The reality is that the train is very expensive and unreliable. The buses are already overloaded (many passengers having to stand) in the rush hour, especially when the trains are frequently not running. The main hospital is not easily accessible, nearly an hour away by car, extremely difficult to access without a car. I wonder how many people die before they even reach the hospital. 3. This area is already poorly served by buses, they do not run frequently enough to be of much use. I note 40 dwellings are to be included 'equivalent of specialist elderly persons accommodation.' This area is too remote from shops, GP services and transport links into Norwich or to the Norfolk and Norwich Hospital. Elderly people living in this area will just become increasingly isolated. This type of housing may also encourage yet more retirees wishing to live near the coast, from more expensive areas such as London. This has already happened in Norfolk and resulted in the current housing stock being ridiculously overpriced. Continuing to attract even more elderly people to the area will only add even more strain to health services in the area. 4. Aside from the presence of a gas pipeline across this area, it is currently being undermined in order to put in place infrastructure connected to offshore wind turbines. 5. Referencing the Lyngate Road Industrial Estate as a source of local jobs is unrealistic. In reality there are very limited jobs in North Walsham. I think you would struggle to find many jobs in the area that would fund a mortgage sufficient to buy many of the properties in the North Walsham area. My son has to travel into Norwich and London for work, his wife into Great Yarmouth in order to fund the purchase of a tiny property in the town. My neighbours all travel into Norwich for work, my husband travels to Wymondham (there were no suitable jobs in North Walsham only Wymondham or Norwich). <p>In reality most people have to travel into Norwich for work. The roads into Norwich are already overloaded, in particular the road through Coltishall. They cannot cope with more commuters.</p> <ol style="list-style-type: none"> 6. The drainage/sewage infrastructure in the surrounding area is already inadequate and poorly maintained. Many existing properties built before 2000 have failing soakaways and non-porous driveways and are (legally or otherwise) directing huge amounts of surface water into the drainage system. I believe this is largely responsible for the increasing number of sinkholes appearing in the town. There has already been at least one on Mayfield Way, another area is currently being investigated by Anglian Water on Mayfield Way. <p>Flooding. The Norfolk County Council Flood Investigation Report into the flooding in North Walsham from 2016 – 2018 indicates that there was flooding in Swafeld Rise and also in the Lyngate Road Industrial Estate area. More development in this area is only going to overload the already inadequate drainage system and lead to more flooding in future.</p> <ol style="list-style-type: none"> 7. I note reference to the 'potential for a secondary access onto Mundesley Road/Lyngate Road.' There is currently a diversion along Lyngate Road and it is clear that this road is not fit to be taking large volumes of heavy traffic, including huge lorries. This suggestion is unrealistic and impractical. Some of the housing there does not have off road parking, so residents have no choice but to park vehicles along this road, resulting in regular congestion. This is without another 330 homes, with the potential for 2, 3 or even 4 car users to each

home, using this route. My neighbours currently have 4 vehicles. Most properties have at least 2 vehicles.

8. Does the proposed 38% of open space include front and rear gardens or is it genuinely 'open space'. So many developments now promise these things in order to get the permission through then fail to deliver and it is then too late to do anything about it.

9. At the site of the recent works carried out by Murphy's, in the area, to install the infrastructure for the offshore wind farms, there were reports of suspected illegal badger culling. Ancient trees and hedgerows have been removed to gain access to the site. I suspect this development would lead to more of the same.

10. North Walsham town centre is already a bottle neck with very narrow roads in the centre. I do not believe that the town can cope with this additional development.

11. This area currently had crops growing on it. When we should be treasuring our farmland and trying to become more self sufficient as a nation, why are we allowing perfectly good farmland to be sold off for development?

12. The land is very low lying and prone to waterlogging.

13. This area is too remote from amenities such as shops, GP surgeries, opticians, dental surgeries, accessible hospital services, the travel hub and transport into Norwich. The bus services are not regular enough with bus stops too far apart to be any use. I frequently walk into town as there is never a bus at the time that I need one. My neighbour uses taxis. Does the development include shops, GP and dental surgeries, schools?

14. There appears to be no mention so called 'affordable homes'. In any case, I understand that the policy to include affordable housing in new developments is not working. The so called 'affordable' homes need to be sold in order to progress the rest of developments and the housing associations are not coming forward to buy these properties as they are frequently not future proofed, without built in energy efficiency measures such as solar panels and alternative energy sources. The housing associations do not want to take them on and then have to face the cost of having to incorporate such measures retrospectively.

15. I do not believe that there is a SHORTAGE of housing (there are plenty for sale), only a shortage of GOOD QUALITY AFFORDABLE housing. If ownership of properties as second homes and holiday lets was prohibited, this would result in more properties hitting the market, generate income in the form of capital gains tax and stamp duty and help to level out the ridiculously overpriced house prices.

<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>Object: Previous proposal by Richborough Developments in 2017, to develop this site, was rejected. The train is very expensive and unreliable. The buses are already overloaded (many passengers having to stand) in the rush hour, especially when the trains are frequently not running. This area is too remote from shops, GP services and transport links into Norwich or to the Norfolk and Norwich Hospital. Elderly people living in this area will just become increasingly isolated. There are very limited jobs in North Walsham.</p> <p>The roads into Norwich are already overloaded, in particular the road through Coltishall. They cannot cope with more commuters. The drainage/sewage infrastructure in the surrounding area is already inadequate and poorly maintained. Many existing properties built before 2000 have failing soakaways and non-porous driveways and are (legally or otherwise) directing huge amounts of surface water into the drainage system. Norfolk County Council Flood Investigation Report into the flooding in North Walsham from 2016 – 2018 indicates that there was flooding in Swafeld Rise and also in the Lyngate Road Industrial Estate area. 'potential for a secondary access onto Mundesley Road/Lyngate Road.' There is currently a diversion along Lyngate Road and it is clear that this road is not fit to be taking large volumes of heavy traffic, including huge lorries. This suggestion is unrealistic and impractical. Some of the housing there does not have off road parking, so residents have no choice but to park vehicles along this road, resulting in regular congestion. North Walsham town centre is already a bottle neck with very narrow roads in the centre.</p> <p>I do not believe that the town can cope with this additional development. The land is very low lying and prone to waterlogging. 'affordable' homes need to be sold in order to progress the rest of developments and the housing associations are not coming forward to buy these</p>

	properties as they are frequently not future proofed, without built in energy efficiency measures such as solar panels and alternative energy sources. Presence of a gas pipeline across this area, it is currently being undermined in order to put in place infrastructure connected to offshore wind turbines. I do not believe that there is a SHORTAGE of housing (there are plenty for sale), only a shortage of GOOD QUALITY AFFORDABLE housing.
Officer Response	<p>Comments noted. The initial HELAA assessment undertaken in 2017 identifies the site as unsuitable based on its impacts on the wider road network. The site's access and other factors were considered suitable at the time. The HELAA assesses sites individually and is a high-level desktop study that informed the early plan process and the districts capacity for residential development, it does not identify allocations and is not the full assessment that informed the Local Plan (this is found in Exam Doc, D3 & Appendix 1 of the Additional Sites Review Background Paper). The full site assessment process is explained in Background paper 6 - Development Site Selection Methodology [Examination Reference C6]. Assessment of the site as expressed in the Site Assessment Booklet (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider network can be mitigated (See exam docs, D19 & EH011e).</p> <p>HSE were consulted on the presence of the existing gas pipeline and raised no issues. The site-specific policy and site design take into account the presence of offshore wind infrastructure works. The site-specific policy also includes the requirement for a Surface Water Management Plan to demonstrate that greenfield run off rates from the site are not increased. The policy also includes a requirement for a Foul Drainage Strategy that will provide details of any enhancements and set out how additional foul flows will be accommodated within the foul sewerage network, this will be delivered prior to the occupation of any dwellings. Affordable housing is required by policy.</p> <p>Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC69
Response Date	21/11/2024 15:56:00
Full Name	Mrs Lindsay Neenan
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am writing to state my opposition to the proposed plans to build another 330 houses on Mundesley Road, North Walsham.</p> <p>Whilst I understand the need for more housing, I feel this development would have a detrimental effect on our community.</p> <p>The increase in population would put a significant strain on our already overburdened infrastructure. Doctors surgeries, schools, dentists etc cannot take any more capacity and this would add even more strain on our public service.</p> <p>The area is that of natural beauty and the build would result in significant environmental damage. The area is used by the community for walks and leisure, having a positive impact on the mental health and wellbeing of many. At a time when this is so important, it is imperative we leave these areas undeveloped.</p> <p>I strongly urge you, for the sake of our town and community, to reconsider this proposed housing development.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	

Officer Summary	Object: The increase in population would put a significant strain on our already overburdened infrastructure. The area is that of natural beauty and the build would result in significant environmental damage. development would have a detrimental effect on our community.
Officer Response	Comments noted. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy.
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC77
Response Date	24/11/2024 15:24:00
Full Name	Guy Thompson
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	Site previously rejected as unsuitable. Further development in North Washam cannot be justified. Serious concerns about local infrastructure being able to cope with further development Demonstrable highway issues on Mundesley Road and other nearby small urban roads with no mitigation provided. Previous studies into traffic in West North Walsham would have to be heavily revised. Concerns over surface water pollution to the river Ant, The Dilham Canal and Pigneys Wood.
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: Site previously considered unsuitable. Further development in North Washam cannot be justified. concerns about local infrastructure being able to cope with further development. highway issues on Mundesley Road and other nearby small urban roads with no mitigation provided. Previous studies into traffic in West North Walsham would have to be heavily revised. Concerns over surface water pollution to the river Ant, The Dilham Canal and Pigneys Wood.
Officer Response	Comments noted. The initial HELAA assessment undertaken in 2017 identifies the site as unsuitable based on its impacts on the wider road network. The site's access and other factors were considered suitable at the time. The HELAA assesses sites individually and is a high-level desktop study that informed the early plan process and the districts capacity for residential development, it does not identify allocations and is not the full assessment that informed the Local Plan (this is found in Exam Doc, D3 & Appendix 1 of the Additional Sites Review Background Paper). The full site assessment process is explained in Background paper 6 - Development Site Selection Methodology [Examination Reference C6]. Assessment of the site as expressed in the Site Assessment Booklet (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider network can be mitigated (See exam docs, D19 & EH011e). Assessment of the site as expressed in the Site Assessment Booklet in the Local Plan's Examination Library (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Further assessment of the site is provided in Appendix 1 of the Additional Sites Review Background Paper. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. The site-specific policy includes the requirement for a Surface Water Management Plan to demonstrate that greenfield run off rates from the site are not increased. The policy also includes a requirement for a Foul Drainage Strategy that will provide details of any

	enhancements and set out how additional foul flows will be accommodated within the foul sewerage network, this will be delivered prior to the occupation of any dwellings.
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC87
Response Date	25/11/2024 07:22:00
Full Name	Mrs Gail Armstrong
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Re: The Paston Gateway. Site Ref: NW16</p> <p>I have, along with other residents in Acorn Road and Swafield Rise that that there is a proposal to build 300 houses on this site on the land to the east Mundesley Road. Like a lot of the residents, I am very concerned about this proposed development. It is entirely unsuitable for the following reasons:</p> <p>The site was rejected in 2017 for very valid reasons</p> <p>Further development in North Walsham beyond that previously accepted cannot be justified.</p> <p>Serious concerns about the local infrastructure – highways, school, health and social care – to cope with a large scale development. Both doctors surgeries are full and there are only two dental practices in town, one of which can take no more patients.</p> <p>The site is on the edge of town with no viable walking routes from the site to schools, healthcare and main shopping facilities hence the significant reliance on cars.</p> <p>Only 2 supermarkets in town where the car parks are already full. There is Waitrose on the edge of North Walsham.</p> <p>Each house will have at least car, but probably two and the roads the site can't cope.</p> <p>There are already highway issues on Mundesley Road, Crow Road, Bacton Road and the B1145/A149 with no indication of mitigations. These roads are used by local residents to access the bypass.</p> <p>Acorn Road is unsuitable as an access route as there is usually roadside parking and used as access to the bypass and Bacton Road.</p> <p>Previous studies for North Walsham West and associated mitigations would require considerable revision and potential costs.</p> <p>Provision of acceptable access arrangements reduces site viability with potential loss of essential affordable housing for local people.</p> <p>Employment – few jobs are available so increasing commuting, usually by rod.</p> <p>Population change data over the last 10 years does not support further housing development beyond that previously planned. The birth rate is falling.</p> <p>Loss of high grade agricultural land.</p> <p>Wildlife in the area including deer, bats, foxes and buzzards.</p> <p>Concerns over the surface water pollution of the River Ant valley, canal and Pigney's. The land slopes down to Little London Road and often floods when there is heavy rain.</p> <p>I hope these comments will be seriously considered during the consultation period.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: The site was rejected in 2017 for very valid reasons. Further development in North Walsham beyond that previously accepted cannot be justified. concerns about the local infrastructure – highways, school, health and social care. site is on the edge of town with no viable walking routes from the site to schools, healthcare and main shopping facilities. There are already highway issues on Mundesley Road, Crow Road, Bacton Road and the

	<p>B1145/A149 with no indication of mitigations. These roads are used by local residents to access the bypass. Acorn Road is unsuitable as an access route as there is usually roadside parking and used as access to the bypass and Bacton Road. Previous studies for North Walsham West and associated mitigations would require considerable revision and potential costs. Access arrangements reduces site viability with potential loss of essential affordable housing for local people. few jobs are available. Population change data over the last 10 years does not support further housing development beyond that previously planned. Loss of high grade agricultural land. Wildlife in the area including deer, bats, foxes and buzzards. Concerns over the surface water pollution of the River Ant valley, canal and Pigney's.</p>
Officer Response	<p>Comments noted. The initial HELAA assessment undertaken in 2017 identifies the site as unsuitable based on its impacts on the wider road network. The site's access and other factors were considered suitable at the time. The HELAA assesses sites individually and is a high-level desktop study that informed the early plan process and the districts capacity for residential development, it does not identify allocations and is not the full assessment that informed the Local Plan (this is found in Exam Doc, D3 & Appendix 1 of the Additional Sites Review Background Paper). The full site assessment process is explained in Background paper 6 - Development Site Selection Methodology [Examination Reference C6]. Assessment of the site as expressed in the Site Assessment Booklet (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider network can be mitigated (See exam docs, D19 & EH011e).</p> <p>Assessment of the site as expressed in the Site Assessment Booklet in the Local Plan's Examination Library (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Further assessment of the site is provided in Appendix 1 of the Additional Sites Review Background Paper. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. No vehicular access is being provided via Acorn Road - this access is pedestrian/cycle only. Policy already includes requirement for a surface water management plan.</p> <p>The site is predominantly within Grade 3 agricultural land and also Grade 2, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.</p> <p>The site-specific policy includes the mitigation and enhancement of the County Wildlife Site and existing mature trees and hedgerows, the site will also be required to provide Open Space in compliance with Local Plan policy.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC91
Response Date	27/11/2024 14:07:00
Full Name	Mrs Jaqueline Saul
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am writing to inform you of my strong objection to the above proposed development plan. As you are aware this site was rejected for development in 2017. Nothing has changed since then and the criteria for this proposed development has not been met, for example: the inter structure is not there for such a development. Where are the new Doctors Surgery, schools, libraries, affordable housing for local people? The chaos that would be caused by the amount of cars, vans etc using the proposed development is unthinkable. Also there would be the loss of farmland and open countryside which would be a tragic loss for North Walsham.</p> <p>There are so many reasons why this development should be rejected once again by the North Norfolk District Council and the Highways Department and I would ask you to consider that</p>

	this proposed development is not beneficial to North Walsham or the environment and would strongly urge you to reject it.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: site was rejected for development in 2017. Nothing has changed since then and the criteria for this proposed development has not been met. infrastructure is not there for such a development. loss of farmland and open countryside. many reasons why this development should be rejected once again by the North Norfolk District Council and the Highways Department
Officer Response	<p>Comments noted. The initial HELAA assessment undertaken in 2017 identifies the site as unsuitable based on its impacts on the wider road network. The site's access and other factors were considered suitable at the time. The HELAA assesses sites individually and is a high-level desktop study that informed the early plan process, it does not identify allocations and is not the final assessment (this is found in Exam Doc, D3 & Appendix 1 of the Additional Sites Review Background Paper). Assessment of the site as expressed in the Site Assessment Booklet (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider network can be mitigated (See exam docs, D19 & EH011e).</p> <p>Assessment of the site as expressed in the Site Assessment Booklet in the Local Plan's Examination Library (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Further assessment of the site is provided in Appendix 1 of the Additional Sites Review Background Paper. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC93
Response Date	26/11/2024 14:48:00
Full Name	Martin & Suzie Burrows
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>We are writing to voice our concerns over the proposed subject planning proposal. Schools infrastructure has little room to expand. Building more housing stock has a direct impact on children in school, as class sizes grow, diluting their educational experience and decreasing their opportunity of success.</p> <ol style="list-style-type: none"> 1 Health care in North Walsham is beyond breaking point. The 2 doctors surgeries have little room for expansion given the lack of investment from government, therefore putting additional pressures on the surgeries to deliver to existing registered residents. Dentist availability is also beyond critical for residents who need NHS dentistry. Extra housing will only increase demand and further weaken availability. 2 Traffic congestion is also an issue during the day with regular log jams in the town and at the traffic lights on Norwich Road. Aylsham Road going out of town is also a major hazard for pedestrians and road users alike as it is narrow, with no footpaths. The road is used by HGV, busses and cars. That part of town needs a bypass to cut down on this through flow., as traffic continues to grow. <p>I fully understand the requirement for new housing stock, especially affordable homes and even the re-introduction of council housing. However, it is totally obvious that North Walsham's infrastructure requires development in line with all the expansion that has taken place over the last 25 years, in my time as a resident. I expect the council will take little notice of any objections and concerns of residents as you are under pressure to meet government targets.</p>

	But to enable an integrated expansion, all aspects of the Towns fabric must develop alongside, which quite clearly to date has not happened.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: Building more housing stock has a direct impact on children in school, as class sizes grow, diluting their educational experience and decreasing their opportunity of success. Health care in North Walsham is beyond breaking point. Extra housing will only increase demand and further weaken availability.</p> <p>Traffic congestion is also an issue during the day with regular log jams in the town and at the traffic lights on Norwich Road. Aylsham Road going out of town is also a major hazard for pedestrians and road users alike as it is narrow, with no footpaths. The road is used by HGV, busses and cars. That part of town needs a bypass to cut down on this through flow., as traffic continues to grow. understand the requirement for new housing stock, especially affordable homes and even the re-introduction of council housing. However, it is totally obvious that North Walsham's infrastructure requires development in line with all the expansion that has taken place over the last 25 years.</p>
Officer Response	<p>Comments noted. Education capacity information is provided by the Education Authority and financial contributions will be considered through the application process in line with Developer contribution policy HC4. Additional opportunities to provide for local infrastructure beyond what is included within the site-specific policy will be explored through the application process. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC99
Response Date	25/11/2024 15:16:00
Full Name	Ms Eleanor Roberts
Organisation	Senior Sustainable Development Officer Water Management Alliance
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Thank you for consulting the Water Management Alliance on the North Norfolk Proposed Submission Version (Regulation 19 Publication) Local Plan. The Parishes included in the Housing Allocation Plan have some lands located within the boundary of the Internal Drainage District (IDD) of the Broads (2006) Internal Drainage Board (IDB) and Norfolk Rivers Internal Drainage Board (IDB). The Board's Byelaws therefore apply to those lands.</p> <p>A copy of the Board's Byelaws for The Broads IDB can be accessed on our website (https://www.wlma.org.uk/uploads/BIDB_Byelaws.pdf), along with maps of the IDD (https://www.wlma.org.uk/uploads/84-BIDB_drainindex.pdf). A copy of the Board's Byelaws for Norfolk Rivers IDB can be accessed on our website (https://www.wlma.org.uk/uploads/NRIDB_Byelaws.pdf), along with maps of the IDD (https://www.wlma.org.uk/uploads/179-NRIDB_Index.pdf).</p> <p>In keeping with other WMA member Boards, the principal function of the Broads (2006) IDB and Norfolk Rivers IDB is to provide flood protection within the Board's area. Certain watercourses within the IDD have been designated as 'Adopted Watercourses' by the Board. The adoption of a watercourse is an acknowledgement by the Board that the watercourse is of arterial importance to the IDD and as such, will normally receive maintenance from the IDD.</p> <p>For clarity, Main Rivers within each IDB are regulated by the Environment Agency.</p>

The Board's rationale and approach towards managing flood risk and water levels within the IDD is set out in the WMA Group's Planning and Byelaw Strategy document (https://www.wlma.org.uk/uploads/WMA_Planning_and_Byelaw_Policy.pdf).

The Board will comment on planning for all major developments (10 or more properties) within the IDD watershed that are likely to discharge surface water into a watercourse within the IDD. Under certain circumstances, some major developments outside the IDD boundary may also be regulated by the Board's byelaws. We request that the Board is consulted as any planning application comes forward relating to any of the identified allocation sites.

In order to reduce potential conflict between the planning process and the Board's regulatory regime and consenting process please be aware of the points set out below.

Sites within WMA Board IDD

- F10 Fakenham, Land South of Barons Close

This allocation site is partially within the Norfolk Rivers IDD, and I note the presence of a Board Adopted watercourse (DRN093G0101 – MN51 Fakenham) adjacent to the southern site boundary, as well as riparian watercourses to the east and west. For any future proposals at this site, please be aware of the following:

- Surface water disposal from new developments should be in line with the drainage hierarchy (as per best practice).
- If surface water is proposed to be disposed of via infiltration, we would recommend that the proposed strategy is supported by ground investigation to determine the infiltration potential of the site and the depth to groundwater. If on-site material were to be considered favourable then we would advise infiltration testing in line with BREDigest 365 (or equivalent) to be undertaken to determine its efficiency.
- If a surface water discharge is proposed to a watercourse, the proposed development will require land drainage consent in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment of a Surface Water Development Contribution fee, calculated in line with the Board's charging policy (https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf).
- The discharge of treated foul water to a watercourse within the IDD requires land drainage consent in line with the Board's byelaws (specifically byelaw 3).
- Any works within 9 metres of a Board adopted watercourse will require consent to relax Byelaw 10 (no obstructions within 9 metres of the edge of drainage or flood risk management infrastructure).
- If development proposals involve works to alter a Board Adopted watercourse, consent is required under Section 23 of the Land Drainage Act 1991 (and byelaw 4).
- Should any development proposals include works to alter a riparian watercourse (including culverting for access), consent will be required under Section 23 of the Land Drainage Act 1991 (and byelaw 4). The Board is responsible for consenting this activity within the IDD, while Norfolk County Council (the Lead Local Flood Authority) is the regulatory body outside the boundary of the IDD.

Sites outside WMA Board IDD with potential to negatively impact the IDD

- C22/2, Cromer, Land West of Pine Tree Farm
- F01/B, Fakenham, Land North of Rudham Stile Lane
- F02, Fakenham, Land Adjacent Petrol Filling Station
- F03, Fakenham, Land at Junction of A148 & B1146
- LUD01/A, Ludham, Land South of School Road
- NW01/B, North Walsham, Land at Norwich Road & Nursery Drive
- NW62/A, North Walsham, Land West of North Walsham
- E7, Tattersett, Tattersett Business Park

The above sites lie outside the Norfolk Rivers IDB's IDD, however have the potential to significantly impact the Board's district should a surface water discharge be proposed. We recommend that as each of these sites prepares to apply for planning permission, they ensure their drainage proposals are designed in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4 and with the input of the IDB. It is possible that consent will be required from the Board for surface water discharge from these sites. It is likely that significant improvement works will be required in the receiving catchments of these developments in order to accept resultant additional flows downstream, for the purpose of reducing flood risk upstream and we would welcome discussion as early as possible to come to any necessary agreements to reduce flood risk in both the Board's IDD downstream and new development upstream.

At this stage our advice for surface water drainage design is as follows:

- Surface water disposal from new developments should be in line with the drainage hierarchy (as per best practice).
- We recommend that a drainage strategy is supplied which has been considered in line with the Planning Practice Guidance SuDS discharge location hierarchy.

- If it is proposed that a site disposes of surface water via infiltration, we recommend that the viability of this proposal is evidenced by ground investigation followed by infiltration testing in line with BRE Digest 365.
- If a surface water discharge is proposed to a watercourse within the watershed catchment of the Board's IDD then we request that this be in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible.
- Should any development proposals include works to alter a riparian watercourse (including culverting for access), consent will be required under Section 23 of the Land Drainage Act 1991. The Board is responsible for consenting this activity within the IDD, while Norfolk County Council (the Lead Local Flood Authority) is the regulatory body outside the boundary of the IDD.

Sites outside WMA Board IDD less likely to negatively impact the IDD

- BLA04/A, Blakeney, Land East of Langham Road
- BRI01, Briston, Land East of Astley Primary School
- BRI02, Briston, Land West of Astley Primary School
- C07/2, Cromer, Land at Cromer High Station
- C16, Cromer, Former Golf Practice Ground, Overstrand Road
- H17, Holt, Land North of Valley Lane
- H20, Holt, Land at Heath Farm
- H27/1, Holt, Land at Heath Farm
- HV01/B*, Hoveton, Land East of Tunstead Road
- LUD06/A, Ludham, Land at Eastern End of Grange Road
- NW52, North Walsham, Land East of Bradfield Road
- MUN03/B, Mundesley, Land off Cromer Road & Church Lane
- SH04, Sheringham, Land Adjoining Seaview Crescent
- SH07, Sheringham, Former Allotments, Weybourne Road, Adjacent to 'The Reef'
- SH18/1B, Sheringham, Land South of Butts Lane
- ST19/A*, Stalham, Land Adjacent Ingham Road
- ST23/2*, Stalham, Land North of Yarmouth Road, East of Broadbeach Gardens
- W01/1, Wells-next-the-Sea, Land South of Ashburton Close
- W07/1, Wells-next-the-Sea, Land Adjacent Holkham Road

*We would expect to see successful infiltration in this location as per other recent local developments.

For the above sites, we have no initial concerns, however as stated above we would request that the WMA is consulted on any forthcoming planning applications at these sites. Our standing advice at this stage is as follows:

- Surface water disposal from new developments should be in line with the drainage hierarchy (as per best practice).
 - We recommend that a drainage strategy is supplied which has been considered in line with the Planning Practice Guidance SuDS discharge location hierarchy.
 - If it is proposed that a site disposes of surface water via infiltration, we recommend that the viability of this proposal is evidenced by ground investigation followed by infiltration testing in line with BRE Digest 365.
 - If a surface water discharge is proposed to a watercourse within the watershed catchment of the Board's IDD then we request that this be in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible.
 - Should any development proposals include works to alter a riparian watercourse (including culverting for access), consent will be required under Section 23 of the Land Drainage Act 1991. The Board is responsible for consenting this activity within the IDD, while Norfolk County Council (the Lead Local Flood Authority) is the regulatory body outside the boundary of the IDD.

Whilst the consenting process as set out under the Land Drainage Act 1991 and the aforementioned Byelaws are separate from planning, the ability to implement a planning permission may be dependent on the granting of these consents. As such we strongly recommend that developers seek the necessary consent prior to determination of a planning application. The Board's officers are available to respond to queries and provide advice.

Do you consider it necessary to participate in a public hearing session, should these be required?

If you wish to participate in a hearing session(s), please

outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<ul style="list-style-type: none"> Site lies out WMA Board IDD with potential to negatively impact the IDD
Officer Response	<p>Comments noted. Policy already includes requirement for a surface water management plan. No changes to policy required.</p> <p>Note: This response is an identical repeat of the WMA Reg 19 response with the exception that site NW16 is included in the table as a 'Sites outside WMA Board IDD with potential to negatively impact the IDD'.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC103
Response Date	28/11/2024 08:38:00
Full Name	Mrs Elizabeth Borrow
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>My objections to the proposed development on the land at the end of Mundesley Road are as follows:</p> <p>1. The Land: As I understand it, the land is Prime Agricultural land (BMV) and should therefore be protected by the Town and Country Planning Department.</p> <p>There is an abundance of wildlife in this area, including owls, skylarks, herons, egrets, cuckoos, water voles, badgers, otters and a wide range of butterflies and other winged insects, and birds.</p> <p>2. Access: There is a serious problem regarding access to the proposed development via Mundesley Road, and Lyngate Road.</p> <p>These roads are very busy with buses, transporters, farm vehicles, and wide vehicle low loaders. Both roads have similar problems. They are very narrow, made worse by parked cars. The pavements are very narrow with only room for a push chair/wheel chair and motorised scooters, of which there are many in this area. Parts of Mundesley Road has only a pavement on one side of the road, which again is very narrow.</p> <p>Large vehicles have difficulty turning in and out of Lyngate Road to/from Mundesley Road and often mount the pavement, not very safe for pedestrians.</p> <p>Both roads are continually being repaired/closed off because they are not suitable for the continual heavy traffic. This causes congestion in other parts of the town.</p> <p>The junction from Lyngate Road onto the B1145 is an accident blackspot, and have been numerous serious accidents with the heavy traffic we already have. What will it be like with another possible 700 plus vehicles?</p> <p>3. Residents: The Doctors, Dentists and Schools in the area are full to capacity. How is the town going to cope with all these extra people? Even if surgeries, dental practices and schools are built, how are they going to be staffed considering there is a shortage of these professional people.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: The land is Prime Agricultural land (BMV) and should therefore be protected by the Town and Country Planning Department. There is an abundance of wildlife in this area. There is a serious problem regarding access to the proposed development via Mundesley Road, and Lyngate Road. These roads are very busy with buses, transporters, farm vehicles, and

	<p>wide vehicle low loaders. Both roads have similar problems. They are very narrow, made worse by parked cars. The pavements are very narrow with only room for a push chair/wheel chair and motorised scooters. Large vehicles have difficulty turning in and out of Lyngate Road to/from Mundesley Road and often mount the pavement, not very safe for pedestrians. The junction from Lyngate Road onto the B1145 is an accident blackspot, and have been numerous serious accidents with the heavy traffic we already have. The Doctors, Dentists and Schools in the area are full to capacity.</p>
Officer Response	<p>Comments noted. The site is predominantly within Grade 3 agricultural land and also Grade 2, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.</p> <p>The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC108
Response Date	01/12/2024 13:41:06
Full Name	Mr Daniel Jackman
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I do not believe that this piece of land should be considered as a potential site in the local plan. In 2017 this site was rejected in the local plan due to a great many issues. The problems still remain - nothing has changed - so the site should not be reconsidered.</p> <p>One of the main problems is access. It's proposed that the primary access will be on the bypass with secondary access directly opposite my house on Mundesley Road. I don't believe anybody driving to or from the town will use the bypass entrance - they will take the 'cut through' on the Mundesley road for ease. Mundesley Road can not take that amount of traffic, let alone the Lyngate Road which is already congested often with accidents happening regularly.</p> <p>This piece of farmland should be kept as farmland. This beautiful part of North Walsham is used by many walkers. The wildlife is abundant.</p> <p>The town has already got 2200 new homes being built on the west side. North Walsham has not grown in population by a degree that warrants this many houses. They will not be used for local people. The infrastructure and roads can not take any more.</p> <p>This site has never been a viable building plot.</p> <p>I urge you not to consider this in the local plan.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: In 2017 this site was rejected in the local plan due to a great many issues. The problems still remain - nothing has changed - so the site should not be reconsidered. One of the main problems is access. It's proposed that the primary access will be on the bypass with secondary access directly opposite my house on Mundesley Road. I don't believe anybody driving to or from the town will use the bypass entrance - they will take the 'cut through' on</p>

	<p>the Mundesley road for ease. Mundesley Road can not take that amount of traffic, let alone the Lyngate Road which is already congested often with accidents happening regularly. This piece of farmland should be kept as farmland. This beautiful part of North Walsham is used by many walkers. The wildlife is abundant. North Walsham has not grown in population by a degree that warrants this many houses. They will not be used for local people. The infrastructure and roads can not take any more. This site has never been a viable building plot.</p>
Officer Response	<p>Comments noted. The initial HELAA assessment undertaken in 2017 identifies the site as unsuitable based on its impacts on the wider road network. The site's access and other factors were considered suitable at the time. The HELAA assesses sites individually and is a high-level desktop study that informed the early plan process and the districts capacity for residential development, it does not identify allocations and is not the full assessment that informed the Local Plan (this is found in Exam Doc, D3 & Appendix 1 of the Additional Sites Review Background Paper). The full site assessment process is explained in Background paper 6 - Development Site Selection Methodology [Examination Reference C6]. Assessment of the site as expressed in the Site Assessment Booklet (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider network can be mitigated (See exam docs, D19 & EH011e).</p> <p>Assessment of the site as expressed in the Site Assessment Booklet in the Local Plan's Examination Library (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Further assessment of the site is provided in Appendix 1 of the Additional Sites Review Background Paper. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application.</p> <p>The site-specific policy includes the mitigation and enhancement of the County Wildlife Site and existing mature trees and hedgerows, the site will also be required to provide Open Space in compliance with the Local Plan.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC114
Response Date	02/12/2024 09:28:17
Full Name	Mrs Elizabeth Beston
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I strongly object to the proposed plans for housing on Mundesley Road, North Walsham (NW16) for the following reasons:</p> <p>TRAFFIC</p> <p>The consultation says there is 'good access to peak time public transport links'. This is not true. I live on the northern edge of the town (closer to the town than the proposed site) and there is one bus a day that takes people to Norwich from a bus stop within walking distance of the site. Most of the time people wanting to travel to Norwich will have to travel to the town centre for the bus or train, which, I promise you, people will drive to those locations. People will also drive to the supermarket, the doctors, and the pharmacy - in fact all amenities, because realistically, it's a little too far to walk, especially if you are elderly or have young children. This will cause issues in the town itself (most of which is a one-way system) and cause havoc on Grammer Road (already congested at peak times) and locally around this part of North Walsham, in particular the part of Lyngate Road that connects the B1145 and Mundesley Road. This connecting road is already used for locals to access the main road and the town and becomes incredibly problematic with congestion at peak times (with on-road parking it is essentially a single-track road). Buses will have increased trouble accessing the road and keeping to bus timetables, and people crossing the road will have to wait even longer to get across (my son says it's hard enough to do so already). In addition, the Premier corner store, (for which people park on the road) by the junction between Lyngate Road and Mundesley Road is very busy at times, causing more congestion. If the proposed housing site is constructed, traffic in this area WILL increase and cause congestion, air pollution, pedestrian dangers, public transport delays, personal delays, and be upsetting to local residents. Further afield, new residents will drive into Norwich for work or leisure. This will be a particular issue in Cottishall, a village that is already overwhelmed with passing traffic through its tiny main street, and at the roundabout connecting B1150 and the A1270, which already has significant delays at peak times, for both car and public transport users. It is also</p>

important to point out that those with school-aged children will drive to the local schools (again, this site is just a little too far to walk to the town) for drop-off and pick-up, causing congestion, air pollution and pedestrian danger outside of those schools.

If a secondary access point to the new estate is created, as proposed in the documentation, this will make the situation even worse. Currently, this part of Mundesley Road is a quiet dead-end, used frequently by walkers to access the old railway track. The increased traffic (including good vehicles) will spoil the tranquillity of this part of Mundesley Road, increase air pollution and be dangerous to pedestrians.

AMENITIES

I am concerned that the doctor's surgery and pharmacy simply do not have the capacity to add more patients to its roster. The carpark is unbelievably busy most of the time and the wait for non-emergency appointments can be weeks. We have a large elderly population here in North Walsham, and I fear the needs of current residents will not be met if further provisions are not built into this proposal.

I am not convinced that the local sewage works has the capacity for an increased population. With an increased population, will the treatment works be able to cope? Have you considered the increase in rainfall due to climate change? Do these two issues in combination mean that more overflow dumps will have to be done? What effect will this have on our waterways and coastline? Do we have guarantees from Anglian Water that they will improve the wastewater facilities locally - can we know that any promises made will not be revoked (water companies do not have the best reputation at the moment)? Increased rainfall due to climate change will also have an impact on surface water runoff. How will runoff affect the surrounding land? What about the historic and wildlife-filled disused canal? Will changing the land from soil to concrete create problems for existing residents in regard to flooding?

WILDLIFE

I have lived on new housing estates before (Lovell's Heath Farm development in Holt), which used to be farmland. I can tell you with absolute certainty that new housing estates are devoid of wildlife. We lived there for 3 years and there was no birdsong and very few insects. It was very sad. In the area proposed we currently have a plethora of wildlife. Lots of birds, lots of small mammals like shrews and mice, and plenty of insects. Even with 'green spaces' promised, centuries-old habitats will be destroyed. Wildlife will be displaced or killed. What was once a thriving ecosystem will become barren. Wildlife is not just important for its own sake, but also provides so many benefits for humans. It encourages people to get outside for their physical and mental health. It brings joy to the elderly and housebound. Remove this, and current residents will suffer the consequences.

Lastly, I wish to ask who is this housing for. The population of North Walsham is not growing. We already have 2200 new houses being built, we don't need any more! I rather feel as if this is an exercise in filling government quotas that have not been thought out at a local level, by people who do not live here or have no interest in the lives of local people. It's all very well saying we need more housing but make sure it is in the right places, for the right reasons, for the right people and with the right infrastructure, which North Walsham DOES NOT HAVE. This site was rejected before for good reason, and it must be rejected again.

Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: there is one bus a day that takes people to Norwich from a bus stop within walking distance of the site. Most of the time people wanting to travel to Norwich will have to travel to the town centre for the bus or train, which, I promise you, people will drive to those locations. it's a little too far to walk, especially if you are elderly or have young children. This will cause issues in the town itself (most of which is a one-way system) and cause havoc on Grammer Road (already congested at peak times) and locally around this part of North Walsham, in particular the part of Lyngate Road that connects the B1145 and Mundesley Road. This connecting road is already used for locals to access the main road and the town and becomes incredibly problematic with congestion at peak times (with on-road parking it is essentially a single-track road). In addition, the Premier corner store, (for which people park on the road) by the junction between Lyngate Road and Mundesley Road is very busy at times, causing more congestion. traffic in this area WILL increase and cause congestion,

	<p>air pollution, pedestrian dangers, public transport delays, personal delays, and be upsetting to local residents. If a secondary access point to the new estate is created, as proposed in the documentation, this will make the situation even worse. Currently, this part of Mundesley Road is a quiet dead-end, used frequently by walkers to access the old railway track. concerned that the doctor's surgery and pharmacy simply do not have the capacity to add more patients to its roster. The carpark is unbelievably busy most of the time and the wait for non-emergency appointments can be weeks. not convinced that the local sewage works has the capacity for an increased population. Increased rainfall due to climate change will also have an impact on surface water runoff. plethora of wildlife. Lots of birds, lots of small mammals like shrews and mice, and plenty of insects. he population of North Walsham is not growing. We already have 2200 new houses being built, we don't need any more! I rather feel as if this is an exercise in filling government quotas that have not been thought out at a local level, by people who do not live here or have no interest in the lives of local people. This site was rejected before for good reason, and it must be rejected again.</p>
Officer Response	<p>Comments noted. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. Additional access onto Mundesley Road will be required to provide a safe and suitable access into the site for vehicles and pedestrians. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p> <p>The site-specific policy includes the requirement for a Surface Water Management Plan to demonstrate that greenfield run off rates from the site are not increased. The policy also includes a requirement for a Foul Drainage Strategy that will provide details of any enhancements and set out how additional foul flows will be accommodated within the foul sewerage network, this will be delivered prior to the occupation of any dwellings.</p> <p>The site-specific policy also includes the mitigation and enhancement of the County Wildlife Site and existing mature trees and hedgerows, the site will also be required to provide Open Space in compliance with the Local Plan. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy.</p> <p>Assessment of the site as expressed in the Site Assessment Booklet in the Local Plan's Examination Library (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Further assessment of the site is provided in Appendix 1 of the Additional Sites Review Background Paper.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC119
Response Date	01/12/2024 10:11:00
Full Name	Nadine Vousden
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am writing to voice my objection to the building of 330 houses at the end of Mundesley Road.</p> <p>Reasons for my objections</p> <p>North Walsham is a medieval town that was never designed to house as many people as the council would like.</p> <p>Our road network has not evolved to any significant degree since the days of the horse and cart.</p> <p>Without proper funding this situation will remain, and will be compounded by the proposed development.</p> <p>The Schools, Doctors, Dentist and public services are sorely lacking at our current level in spite of promises for their improvement at the last stage of development.</p> <p>Please would you explain why this was overlooked and how you intend to rectify before the next stage of planned development?</p> <p>Public services need to be kept in proportion with the population they are intending to serve. I see no evidence they will increase with demand. Please would you explain how you plan to deliver?</p>

Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: North Walsham is a medieval town that was never designed to house as many people as the council would like. Our road network has not evolved to any significant degree since the days of the horse and cart. Without proper funding this situation will remain. The Schools, Doctors, Dentist and public services are sorely lacking at our current level in spite of promises for their improvement at the last stage of development. Public services need to be kept in proportion with the population they are intending to serve. I see no evidence they will increase with demand.
Officer Response	Comments noted. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Opportunities to provide for local infrastructure beyond what is included within the site-specific policy will be explored through the application process. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application.
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC124
Response Date	02/12/2024 10:24:00
Full Name	Paul Johnson
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I live adjacent go Lyngate Road, North Walsham and strongly oppose the proposed development, with my reasons listed below.</p> <ul style="list-style-type: none"> · North Walsham already has significant land put aside for building new homes, there really is not the need to add to this when the town cannot cope and does not have the facilities for its current population. · The proposed land is top quality farming land that affords the farmer two harvests a year. · Environmental impact, this is a very large piece of land that funnels down to a nature reserve, there is already significant evidence of flooding on Little London Road and surrounding land. · The top of the field has already had problems with heavy water build up, the farmer has recently, and in a rather rushed manner delivered many tons of soil to cover it, so hurried that they didn't have time to remove the potatoes and plants from the soil. · Wildlife, the field and adjacent land enjoys a healthy variety of wildlife, this will have a massive impact on their future. · Infrastructure, the road system cannot handle the additional vehicle movements that a new estate would deliver to this side of town, the roads are already over congested, Acorn Road and Mayfield Way are very busy in peak period, added to with drivers using it as a cut through to avoid Crow Road and its dangers. Mundesley Road and Lyngate Road are often blocked and the frequency of accidents on that end of the B1145 clearly indicates it cannot handle any further uplift in traffic. <p>I live on Lyngate Road which has become a racetrack for many of the users hitting 60 plus miles an hour speed. Someone will be killed or seriously injured if no action is taken on Lyngate to reduce speeds. The road is too narrow to accommodate lorries with frequent use of the narrow pavement by the large HGV lorries that use it at all hours of the day and night. (I know there are supposed restrictions on lorry use, but these are ignored!).</p> <p>Today, Monday the 2nd December, 2024 I carried out my own traffic survey.</p>

Spending 15 minutes at various times today detailed below I counted the following level of use. Expanding to build another housing estate with limited access will cause more traffic and infrastructure issues that wont help. I **do not** believe that building a Bridge/Roundabout further up the bypass will help Lyngate Road. Traffic from Norwich will filter to use Lyngate Road as it's the first access point rather than drive further up the road. Vice Versa if the new estate goes ahead and the proposed Bridge/Roundabout is used, then Lyngate Road will still be the focal point for the new estate residents to access Sainsbury's and the town facilities.

I was disappointed but not surprised at the Town Council meeting that the developers had not even considered Lyngate Road as an issue with their presentation which shows at best naivety to the local infrastructure and at worst total disregard for local residents.

Lyngate Road was designed as a quiet small use residential road that has become a major thoroughfare. Extra housing will cause further congestion and is totally unacceptable.

Our houses shake when the HGV's drive past.

Will the council cover any subsidence bills caused by increased traffic?

- The land already allocated for building appears to be carefully thought out with access to the rail and road links without placing pressure on the small and out of date road systems.
- The lack of quality employment in town already discourages younger members of the community to purchase property in Norwich. Anyone moving to the area is also likely to have to commute to and from Norwich, which supports the allocated land already in place on that side of town.
- Road proposals, a bridge and roundabout have not been thought through, this will have a massive impact on safety, flooding and environment.
- Lack of Doctor capacity, No NHS and limited private Dental practices all are seemingly ignored.

Traffic Survey: December 2nd, 2024 sample taken from observing traffic flow Lyngate Road.

7.15 am to 7.30 am
59 cars/vans, 6 HGV's and 2 buses

7.50 am to 8.05am
136 cars/vans and 3 HGV's

10.30am to 10.45am
78 cars/vans and 5 HGV's

3.05pm to 3.20pm
102 cars/vans,3 HGV's and 2 bus

There were in the space of a 75 minute sample spread throughout the day
492 cars/vans using the road, plus 19 HGV's and 4 buses.

If this is average over an 18 hour day it looks like:
7000 plus cars and likely 100 or more HGV's.

Traffic survey 5pm to 5.15 pm ..117 cars/vans and 2 HGV's

<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>Object: North Walsham already has significant land put aside for building new homes, there really is not the need to add to this when the town cannot cope and does not have the facilities for its current population. proposed land is top quality farming land that affords the farmer two harvests a year. this is a very large piece of land that funnels down to a nature reserve, there is already significant evidence of flooding on Little London Road and surrounding land. top of the field has already had problems with heavy water build up. the field and adjacent land enjoys a healthy variety of wildlife. the road system cannot handle the additional vehicle movements that a new estate would deliver to this side of town, the roads are already over congested, Acorn Road and Mayfield Way are very busy in peak period, added to with drivers using it as a cut through to avoid Crow Road and its dangers. Mundesley Road and Lyngate Road are often blocked and the frequency of accidents on that end of the B1145 clearly indicates it cannot handle any further uplift in traffic. Conducted own traffic survey. lack of</p>

	quality employment in town. Road proposals, a bridge and roundabout have not been thought through.
Officer Response	<p>Comments noted. The site is predominantly within Grade 3 agricultural land and also Grade 2, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.</p> <p>Policy already includes requirement for a surface water management plan and Drainage Strategy and Open Space is to be provided on the northern boundary of the site. The site-specific policy includes the mitigation and enhancement of the County Wildlife Site and existing mature trees and hedgerows, the site will also be required to provide Open Space in compliance with the Local Plan. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC127
Response Date	03/12/2024 11:57:14
Full Name	Mr Adrian Will
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>This proposal is wrong on so many levels and we really cannot believe it has once again raised its head as a potential for consideration. Our reasons are as follows:</p> <ul style="list-style-type: none"> • The proposed land is top quality farming land that affords the farmer two harvests a year, this year they have also have the addition of grazing sheep on the land. • North Walsham already has carefully considered plans for land put aside for building which takes into consideration road, rail and access to amenities, making the town central to the layout of future developments. • Location, this Land is too far away from all the amenities. To get anywhere will require a car, the road systems currently cannot handle the volume of vehicle movements. 330 new homes would further impact on the regularly grid locked out of date road system that is in place on this side of town. Acorn Road and Mayfield Way are very busy in peak periods, added to by drivers using it as a cut through from Bacton Road to avoid using Crow Road, which is also frequently gridlocked. Mundesley Road and Lyngate Road are often blocked and the frequency of accidents on that end of the B1145 clearly indicates it cannot handle any further uplift in traffic. • The developers have indicated an additional access to the B1145, clearly not thought through with safety or practicality in mind. That end of the bypass is not suitable for an additional uplift in traffic, as well as the damage to the old railway route which is popular with walkers. Such scheme will create further drainage issues and people would be highly unlikely to use it to access the town, choosing to take the path of least resistance and head for the easiest route to the supermarkets, schools etc. • Environmental impact, this is a very large piece of land that funnels down to a nature reserve, there is already significant evidence of flooding on Little London Road and surrounding land. • The top of the field has already had problems with heavy water build up, the farmer has recently, and in a rather rushed manner, delivered many tons of soil to cover it, so hurried that they didn't have time to remove the potatoes and plants from the soil. • There is a mains gas line running along side this land, surely this will represent a significant risk for any building of roads across the old railway route. • Wildlife, the field and adjacent land enjoys a healthy variety of wildlife, this proposal, if passed will have a dramatic impact on their future. • The lack of quality employment in town already discourages younger members of the community from purchasing property in town, favouring to head closer Norwich for its opportunities and facilities. Anyone moving to this area is also likely to have to commute

	<p>to and from Norwich, which supports the allocated land already in place on that side of town with direct access to the A149, B1145 and B1150 without adding further congestion to the town centre.</p> <ul style="list-style-type: none"> • Sewerage – The developer’s proposal is to pump sewage to the current works, the infrastructure in place already struggles to cope and so this will need investment to avoid problems in other lower parts of the town. • Amenities – North Walsham already has plans for 2200 new homes to be built, our town already struggles to offer the residents suitable access to Doctors, Dentist and other services so the plans already agreed will represent a further challenge, we simply cannot absorb more without significant investment. • Finally appears to be so many empty buildings around town which already have drainage and utilities in place, affordable homes for our younger generation has to be the priority surely we should be exhausting these opportunities first before any consideration is given to green field sites. <p>We understand firsthand the problems that new estates can produce for existing residents, our previous property was flooded because of heavy rain, unmanaged and out of date drainage systems and a new estate being added to the same system.</p> <p>We have all seen the impacts that changeable weather is having on our countryside, this area of North Walsham is a beautiful area, bursting with wildlife and already struggling with land drainage, 330 new homes will without doubt push it over the edge and then it’s too late. Who can we hold accountable and responsible for these issues then?</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	<p>No</p>
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>Object: The proposed land is top quality farming land that affords the farmer two harvests a year, this year they have also have the addition of grazing sheep on the land. North Walsham already has carefully considered plans for land put aside for building which takes into consideration road, rail and access to amenities, making the town central to the layout of future developments.</p> <p>Location, this Land is too far away from all the amenities. To get anywhere will require a car, the road systems currently cannot handle the volume of vehicle movements. 330 new homes would further impact on the regularly grid locked out of date road system that is in place on this side of town. Acorn Road and Mayfield Way are very busy in peak periods, added to by drivers using it as a cut through from Bacton Road to avoid using Crow Road, which is also frequently gridlocked. Mundesley Road and Lyngate Road are often blocked and the frequency of accidents on that end of the B1145 clearly indicates it cannot handle any further uplift in traffic.</p> <p>The developers have indicated an additional access to the B1145, clearly not thought through with safety or practicality in mind. That end of the bypass is not suitable for an additional uplift in traffic, as well as the damage to the old railway route which is popular with walkers. Such scheme will create further drainage issues. This is a very large piece of land that funnels down to a nature reserve, there is already significant evidence of flooding on Little London Road and surrounding land. The field and adjacent land enjoys a healthy variety of wildlife, this proposal, if passed will have a dramatic impact on their future.</p> <p>There is a mains gas line running along side this land, surely this will represent a significant risk for any building of roads across the old railway route. Lack of quality employment in town already discourages younger members of the community from purchasing property in town, favouring to head closer Norwich for its opportunities and facilities. The developer’s proposal is to pump sewage to the current works, the infrastructure in place already struggles to cope and so this will need investment to avoid problems in other lower parts of the town.</p> <p>North Walsham already has plans for 2200 new homes to be built, our town already struggles to offer the residents suitable access to Doctors, Dentist and other services so the plans already agreed will represent a further challenge, we simply cannot absorb more without significant investment. Finally appears to be so many empty buildings around town which already have drainage and utilities in place, affordable homes for our younger generation has to be the priority</p>

Officer Response	<p>Comments noted. The site is predominantly within Grade 3 agricultural land and also Grade 2, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth. The Council has a Brownfield Register, there are not enough sites on this register to accommodate the required growth needed as set out in Policy SS1.</p> <p>The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. The site-specific policy includes the requirement for a Surface Water Management Plan to demonstrate that greenfield run off rates from the site are not increased. The policy also includes a requirement for a Foul Drainage Strategy that will provide details of any enhancements and set out how additional foul flows will be accommodated within the foul sewerage network, this will be delivered prior to the occupation of any dwellings.</p> <p>HSE were consulted on the presence of the existing gas pipeline and raised no issues. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC129
Response Date	03/12/2024 15:47:00
Full Name	Nigel Lloyd
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I will say up front that I strongly OBJECT to the proposal to build 360 homes within the countryside adjacent to Mundesley Road, North Walsham.</p> <p>When I was a NW Councillor and Member of the planning committee at NNDC, this area was rejected for good reasons and those objection were supported by NNDC Planning Department. Nothing has changed since then! I raise the following points to support my objection.....</p> <p><u>Principle</u></p> <p>It was decided to build over 2000 homes in North Walsham on the West of the town. It is clear that the proposed new roads connecting Cromer and Norwich Roads in the West will be costly and these roads must be in place before any construction begins. Increasing the acreage in the West by a further 360 homes will assist those Developers to contribute financially support these new routes. Building elsewhere means the town will get less in return for the Developer profit. Increasing the number of homes in the West will help to bring tangible benefits to the town that counter the downside of another 2000 + homes. The developer contribution at NW16 of 360 new homes will bring minimal benefits to residents but serve to make their lives worse.</p> <p><u>Highways</u></p> <p>Any new development in this location must be served by at least two access to routes to support emergency services. There are simply no acceptable traffic routes to support this development. Any suggestion that an access route onto the bypass for this development is laughable. 360 homes will simply not support the cost of a new road junction onto a trunk Rd.</p> <p>Mundesley Road is already busy. It supports HGV traffic routes through the town, regular Sainsburys deliveries, it is a main route to the coast - all this in addition to local traffic. Nearly all traffic is routed down Crow Rd (a small width road that supports vehicle movements of only 1 HGV at a time) or Lyngate Road which has parked cars, a bus stop and a high level of pedestrian movements. This road already becomes gridlocked at certain times of the day and cannot sustain more traffic movements. The proposed access onto Mundesley Rd from the estate is therefore unacceptable and dangerous.</p>

Traffic must be routed away from Acorn Estate. Acorn estate is blessed with a tiny width road network that is barely acceptable to local traffic as it is. Any further traffic movements will cause this estate to become gridlocked, unpleasant and add risk to the residents. The road network was simply not designed for any further traffic!

Little London Road must be avoided at all costs! This is a gateway to the countryside for NW residents and is regularly used for recreation and a route to the NW & Dilham Canal, Paston Way and Pigneys Wood.

Affordable Homes

There are over 350 local residents waiting to be housed in NW. The small offering of affordable homes is unacceptable and NNDC must reject anything less than 40% affordable. It is unacceptable to put developer profit before the needs of the population. We all know that a care home will never be built.

Countryside

The East of the town and specifically the end of Mundesley Road supports a large pedestrian recreational presence. Routes to Paston Way, The NW & Dilham Canal amenity, Pigneys Wood and the countryside beyond are all funnelled into the area of NW16. Planners must realise that having proposed significant development in the West, the town now needs to retain its countryside amenity. It was always proposed that the NW16 area should remain as an amenity for the town and it should!

Environment

The wildlife corridors supported by Paston Way, the NW & Dilham Canal and Pigneys Wood are important wildlife habitats that should be preserved for the benefit of the existing fauna and flora and for residents, many of whom seek the tranquillity and solace that these areas currently offer. A development in this location risk displacing important species from these habitats and once gone - they may never return.

Please look to add houses to a more sustainable location

Do you consider it necessary to participate in a public hearing session, should these be required?

If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:

File (where submitted)

Officer Summary

Object: strongly **OBJECT** to the proposal to build 360 homes within the countryside adjacent to Mundesley Road, North Walsham. When I was a NW Councillor and Member of the planning committee at NNDC, this area was rejected for good reasons and those objection were supported by NNDC Planning Department. Nothing has changed since then!

The developer contribution at NW16 of 360 new homes will being minimal benefits to residents but serve to make their lives worse. Any new development in this location must be served by at least two access to routes to support emergency services. There are simply no acceptable traffic routes to support this development. Any suggestion that an access route onto the bypass for this development is laughable. 360 homes will simply not support the cost of a new road junction onto a trunk Rd. Mundesley Road is already busy. It supports HGV traffic routes through the town, regular Sainsburys deliveries, it is a main route to the coast - all this in addition to local traffic. Nearly all traffic is routed down Crow Rd (a small width troad hat supports vehicle movements of only 1 HGV at a time) or Lyngate Road which has parked cars, a bus stop and a high level of pedestrian movements. Traffic must be routed away from Acorn Estate. Little London Road must be avoided at all costs!

There are over 350 local residents waiting to be housed in NW. The small offering of affordable homes is unacceptable and NNDC must reject anything less than 40% affordable. It is unacceptable to put developer profit before the needs of the population.

The East of the town and specifically the end of Mundesley Road supports a large pedestrian recreational presence. Routes to Paston Way, The NW & Dilham Canal amenity, Pigneys Wood and the countryside beyond are all funnelled into the area of NW16. The wildlife corridors supported by Paston Way, the NW & Dilham Canal and Pigneys Wood are important wildlife habitats that should be preserved for the benefit of the existing fauna and flora and for residents, many of whom seek the tranquillity and solace that these areas currently offer.

Officer Response	<p>Comments noted. No Outline or Full planning application was submitted to the Council in 2017. The initial HELAA assessment undertaken in 2017 identifies the site as unsuitable based on its impacts on the wider road network. The site's access and other factors were considered suitable at the time. The HELAA assesses sites individually and is a high-level desktop study that informed the early plan process and the districts capacity for residential development, it does not identify allocations and is not the full assessment that informed the Local Plan (this is found in Exam Doc, D3 & Appendix 1 of the Additional Sites Review Background Paper). The full site assessment process is explained in Background paper 6 - Development Site Selection Methodology [Examination Reference C6]. Assessment of the site as expressed in the Site Assessment Booklet (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider network can be mitigated (See exam docs, D19 & EH011e).</p> <p>Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability. Built development will not be located immediately adjacent to Little London Road and no vehicular access is being provided via Acorn Road - this access is pedestrian/cycle only. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application.</p> <p>Affordable Housing is required by policy as set out in the Local Plan. The site-specific policy includes the mitigation and enhancement of the County Wildlife Site and existing mature trees and hedgerows, the site will also be required to provide Open Space in compliance with the Local Plan.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC134
Response Date	03/12/2024 14:58:00
Full Name	Jasmine Dewberry
Organisation	Deputy Clerk North Walsham Town Council
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>North Walsham Town Council wishes to oppose the proposal in the latest consultation on the North Norfolk District Council Local Plan for land at the end of Mundesley Rd (N16) to be changed from a countryside allocation to residential.</p> <p>In the original consultation process on the Local Plan, which the Town Council was involved in, the allocation of this site for housing was rejected in favour of land to the west of the town. The reasons for this included the remoteness of the site from the town centre and services, an adverse impact on a valued landscape and an unsuitable local road network. This reasoning was supported at the time by the Council's Planning Policy Officers and then Cllrs. It was a decision that the Town Council accepted at that time.</p> <p>The Town Council sees no reason for this assessment of the site to be changed in the latest consultation. It points out that the adverse environmental impact is recognised by the Council as still remaining and believes the change in the Council's stance that the site is now accessible to the town centre and services is not evidenced based. The circumstances that led the District Council to originally say that the site was remote have not changed.</p> <p>The Town Council points out that the site is a long way from local schools, medical centres, and local supermarkets as well as links to the local (bus) travel hub and railway station. In essence, the site does not provide viable walking routes to these facilities and means residents of any development will be dependent on using private cars. In practice it will mean several hundred extra car journeys each day on residential streets many of which already carry significant traffic volumes.</p> <p>The District Council will be aware that over 2000 extra homes in North Walsham are already in the process of being built or provided for in the existing proposed Local Plan. It is presumed that the District Council is aware of the infrastructure challenges that this brings without providing for even more houses at the end of Mundesley Rd. The Town Council, in particular, points out that the existing medical surgeries are inadequate and struggling to meet current</p>

demand with no expansion likely for many years. Further, no NHS Dentistry services for new clients exist in the town and the capacity of local private dental practices to take on more customers is very limited.

It also has to be presumed that residents at the site are likely to seek employment opportunities in the Greater Norwich Area. However, the main road route to Norwich (B1150) is already experiencing major traffic congestion at Coltishall and this has led the local Council's for the village to expressing concern about the existing planned expansion of North Walsham. It is therefore not the case as suggested by the District Council's Planning Officers analysis that the site in general has good access to employment.

The Town Council has recently been advised by the District Council's Housing Dept that there are around 350 households with a local connection to North Walsham on the Council's social housing waiting list and that in recent years only around 10 percent of such households are being rehoused in any given year. Further, the Council was informed at its Full Council meeting on 27/11/24 by the Developers that just 15 per cent of the proposed new houses will be affordable. It therefore questions whether the proposed extra houses will have any real impact on this level of local housing need. Instead, the likely outcome will be more people coming to live in the town but no progress being made on the existing housing needs of local residents.

In conclusion, the Town Council recognises the District Council faces challenges arising from for the Planning Inspectorate's decision that for the North Norfolk Local Plan to be approved land for what is understood to be an extra 1000 houses has to be provided. However, what is proposed looks like an easy option to find housing numbers to satisfy the Planning Inspectorate, but which takes no account of the loss of valued countryside or inadequate infrastructure in North Walsham. The Town Council, however, recognises the importance of the Local Plan being approved to enable regulated housing development in future years. Therefore, if North Walsham is going to have to provide more land for housing the Council remains open to having further discussions with the District Council on what may be more appropriate sites than land at the end of Mundesley Rd.

<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>Object: In the original consultation process on the Local Plan, which the Town Council was involved in, the allocation of this site for housing was rejected in favour of land to the west of the town. The reasons for this included the remoteness of the site from the town centre and services, an adverse impact on a valued landscape and an unsuitable local road network. This reasoning was supported at the time by the Council's Planning Policy Officers and then Cllrs. It was a decision that the Town Council accepted at that time. The Town Council sees no reason for this assessment of the site to be changed in the latest consultation.</p> <p>The Town Council points out that the site is a long way from local schools, medical centres, and local supermarkets as well as links to the local (bus) travel hub and railway station. In essence, the site does not provide viable walking routes to these facilities and means residents of any development will be dependent on using private cars. In practice it will mean several hundred extra car journeys each day on residential streets many of which already carry significant traffic volumes.</p> <p>It is presumed that the District Council is aware of the infrastructure challenges that this brings without providing for even more houses at the end of Mundesley Rd. The Town Council, in particular, points out that the existing medical surgeries are inadequate and struggling to meet current demand with no expansion likely for many years. Further, no NHS Dentistry services for new clients exist in the town and the capacity of local private dental practices to take on more customers is very limited.</p> <p>It also has to be presumed that residents at the site are likely to seek employment opportunities in the Greater Norwich Area. However, the main road route to Norwich (B1150) is already experiencing major traffic congestion at Coltishall and this has led the local Council's for the village to expressing concern about the existing planned expansion of North Walsham.</p> <p>Town Council therefore questions whether the proposed extra houses will have any real impact on this level of local housing need. Instead, the likely outcome will be more people coming to live in the town but no progress being made on the existing housing needs of local residents.</p>

	<p>the Town Council recognises the District Council faces challenges arising from for the Planning Inspectorate's decision that for the North Norfolk Local Plan to be approved land for what is understood to be an extra 1000 houses has to be provided. However, what is proposed looks like an easy option to find housing numbers to satisfy the Planning Inspectorate, but which takes no account of the loss of valued countryside or inadequate infrastructure in North Walsham. The Town Council, however, recognises the importance of the Local Plan being approved to enable regulated housing development in future years. Therefore, if North Walsham is going to have to provide more land for housing the Council remains open to having further discussions with the District Council on what may be more appropriate sites than land at the end of Mundesley Rd.</p>
Officer Response	<p>Comments noted. The initial HELAA assessment undertaken in 2017 identifies the site as unsuitable based on its impacts on the wider road network. The site's access and other factors were considered suitable at the time. The HELAA assesses sites individually and is a high-level desktop study that informed the early plan process and the districts capacity for residential development, it does not identify allocations and is not the full assessment that informed the Local Plan (this is found in Exam Doc, D3 & Appendix 1 of the Additional Sites Review Background Paper). The full site assessment process is explained in Background paper 6 - Development Site Selection Methodology [Examination Reference C6]. Assessment of the site as expressed in the Site Assessment Booklet (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider network can be mitigated (See exam docs, D19 & EH011e). Assessment of the site as expressed in the Site Assessment Booklet in the Local Plan's Examination Library (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Further assessment of the site is provided in Appendix 1 of the Additional Sites Review Background Paper.</p> <p>Education capacity information is provided by the Education Authority and financial contributions will be considered through the application process in line with Developer contribution policy HC4. The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning in Health Protocol. The protocol presents a process describing how relevant NHS organisations, Norfolk & Suffolk County Councils, Public Health and the Norfolk and East Suffolk Local Planning Authorities jointly engage to ensure that health considerations are adequately accounted for in plan making and in planning applications and their subsequent developments so that the appropriate authorities can plan and priorities investment(s). Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p> <p>The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC135
Response Date	04/12/2024 08:11:00
Full Name	Mr & Miss C & A Weller & Powles
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I would urge you to take into account the following when deciding whether the plan for 330 new houses at the land at the end of Mundesley Road (NW16) should move forward;</p> <p>HIGHWAYS</p> <p>Lyngate Road does NOT provide a viable alternative connection between the B1145 and Mundesley Road. The road is too narrow and busy for the existing amount of traffic - road rage is a daily occurrence. HGV's and wider vehicles regularly use the pavement. It becomes heavily congested and sometimes gridlocked due to HGV's and buses unable to manoeuvre</p>

in and out of the narrow junction with Mundesley Road. This is also true for the road between that junction and Crow Road.

This problem will not be solved with the building of an access road and a roundabout coming out onto the B1145 as the cars will immediately turn left down Lyngate Road to get to Sainsbury's, not just the supermarket but the ONLY petrol station in the town.

The junction of Lyngate Road with the B1145 is a high accident spot.

How will these road cope with the construction traffic?

The town as a whole can become gridlocked due to the layout of the towns roads. The town cannot cope with more traffic. A map doesn't show the towns traffic flow and pinch points.

On a side note the developers are referring to a stretch of the B1145 as Lyngate Road as this is what it says if you zoom in on google maps. I have pointed out to them that it could cause some confusion.

ANGLIAN WATER

Underneath the Anglian Water heading it states that investment is likely required. We already know that the sewage system needs updating as it is. We have experienced foul water flooding due to hydraulic overload. We were told investment was needed and that it wasn't in Anglian Water's budget. Luckily a quick fix of a non return valve has put a sticking plaster over the problem but the problem is obviously still there. If there is no investment by Anglian Water how will the towns sewage system cope?

The Lynfield Estate is awaiting work to be carried out to alleviate flooding. The work has been delayed until 2026.

LANDSCAPE

The land is good quality farmland, but it is not just about the land being farmland, it is the fact that the Weavers Way runs along one side of it and it is only one field away from the canal. The building of the houses will have a detrimental effect on the wildlife areas surrounding it. It is a green space which should be protected and cherished.

SCHOOLS, DOCTORS & DENTISTS

The closest school to the area is at capacity.

Current wait at Birchwood Surgery is 7 weeks for a routine doctors appointment. Is there space for more patients?

No NHS dentist spaces and limited private.

And that is without the new residents of the 2000 plus houses which are in the process of being built!

AFFORDABLE HOUSING

We agree that more AFFORDABLE housing is needed. When asked, the developers could not answer what a starter home would cost they merely spoke about the wider economics. The lack of employment opportunities, let alone highly paid employment opportunities within the town mean that these homes are not for locally employed people.

The majority of the houses are going to be Executive 3/4 bedroom houses.

This development does not sufficiently help the local people who require social and affordable housing.

We understand that planning was denied in 2017. Nothing has changed since then, except for the government asking every council to build more houses. Please do not build a development in an area that cannot cope with it.

We implore you to listen to the views of local people, who live in the town and are in the best position to know what will and won't work. The town does not have the infrastructure to support the plan. The placing of this development does not make sense and will have a detrimental effect on, the residents who live nearby, the town and the surrounding areas.

Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: Lyngate Road does NOT provide a viable alternative connection between the B1145 and Mundesley Road. The road is too narrow and busy for the existing amount of traffic - road rage is a daily occurrence. HGV's and wider vehicles regularly use the pavement. It

becomes heavily congested and sometimes gridlocked due to HGV's and buses unable to manoeuvre in and out of the narrow junction with Mundesley Road. This is also true for the road between that junction and Crow Road. This problem will not be solved with the building of an access road and a roundabout coming out onto the B1145 as the cars will immediately turn left down Lyngate Road to get to Sainsbury's, not just the supermarket but the ONLY petrol station in the town. The town as a whole can become gridlocked due to the layout of the towns roads. The town cannot cope with more traffic.

Underneath the Anglian Water heading it states that investment is likely required. We already know that the sewage system needs updating as it is. We have experienced foul water flooding due to hydraulic overload. We were told investment was needed and that it wasn't in Anglian Water's budget. Luckily a quick fix of a non return valve has put a sticking plaster over the problem but the problem is obviously still there. If there is no investment by Anglian Water how will the towns sewage system cope?

The land is good quality farmland, but it is not just about the land being farmland, it is the fact that the Weavers Way runs along one side of it and it is only one field away from the canal. The building of the houses will have a detrimental effect on the wildlife areas surrounding it.

The closest school to the area is at capacity. Current wait at Birchwood Surgery is 7 weeks for a routine doctors appointment. Is there space for more patients? We agree that more AFFORDABLE housing is needed. When asked, the developers could not answer what a starter home would cost they merely spoke about the wider economics. The lack of employment opportunities, let alone highly paid employment opportunities within the town mean that these homes are not for locally employed people.

We understand that planning was denied in 2017. Nothing has changed since then, except for the government asking every council to build more houses. Please do not build a development in an area that cannot cope with it.

Officer Response

Comments noted. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider road network can be mitigated (See exam docs, D19 & EH011e).

The site-specific policy includes the requirement for a Surface Water Management Plan to demonstrate that greenfield run off rates from the site are not increased. The policy also includes a requirement for a Foul Drainage Strategy that will provide details of any enhancements and set out how additional foul flows will be accommodated within the foul sewerage network, this will be delivered prior to the occupation of any dwellings. Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (C4, Page 25). Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.

The site-specific policy includes the mitigation and enhancement of the County Wildlife Site and existing mature trees and hedgerows, the site will also be required to provide Open Space in compliance with the Local Plan. No Outline or Full planning application was submitted to the Council in 2017.

The initial HELAA assessment undertaken in 2017 identifies the site as unsuitable based on its impacts on the wider road network. The site's access and other factors were considered suitable at the time. The HELAA assesses sites individually and is a high-level desktop study that informed the early plan process and the districts capacity for residential development, it does not identify allocations and is not the full assessment that informed the Local Plan (this is found in Exam Doc, D3 & Appendix 1 of the Additional Sites Review Background Paper). The full site assessment process is explained in Background paper 6 - Development Site Selection Methodology [Examination Reference C6]. Assessment of the site as expressed in the Site Assessment Booklet (D3) concludes the site is *suitable but not taken further* as it was not required at the time. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider network can be mitigated (See exam docs, D19 & EH011e). Assessment of the site as expressed in the Site Assessment Booklet in the Local Plan's Examination Library (D3) concludes the site is *suitable but not taken further* as it was not required at the time. Further assessment of the site is provided in Appendix 1 of the Additional Sites Review Background Paper.

Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC136
Response Date	05/12/2024 11:53:06
Full Name	Mr David Curtis
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Local residents are now in receipt of the Draft Policy NW16 - Land At End Of Mundesley Road, as supplied by the council.</p> <p>Whilst a good start document, I feel certain "specific requirements" made need to be improved upon :</p> <p>1 - The B1145 at the access point mentioned is National Speed limit. Surely provision needs making to bring this into a safe limit.</p> <p>2 - "Provision of a bridge over the Paston Way". What sort of bridge, footbridge, rope bridge?? This needs to be clarified as a 2 lane vehicular access capable of taking the weights of vehicles that will be accessing the site during construction and beyond.</p> <p>Referring to the A4 flyer as distributed by Richborough on Wednesday the 27th November 2024.</p> <p>1 - The primary access is listed as via the bridge to the B1145. This sounds wonderful in getting traffic out onto the bypass. What clauses will be insisted upon to ensure the site is developed from this bridge. As an individual of many years business experience I can see the site being built via the secondary access off Old Mundesley Road, and once built the proposed primary access bridge gets kicked into the long grass. As a sign of commitment to the project and therefore the town I regard it as non- negotiable that the primary access route is constructed first before any development of the site starts.</p> <p>2 - Note is made of access via the B1145 Lyngate Road. This is incorrect, they are 2 totally separate roads. With reference to Lyngate Road, although a 2 lane road, for about 100 metres there is provision for residents to park their cars. This effectively reduces the road to a single carriageway. This road is already a bottleneck; with potentially another 600 cars using this road it can only cause more problems and also damage to the road and affect the health of residents of that road.</p> <p>3 - It is pointed out that this will be sustainable. In order to be sustainable residents will have to have an income. This morning - 5th December 2024 - I have trawled websites such as LinkedIn, Indeed etc to see how many jobs are available in North Walsham. It turn out to be a total of 25. How is this going to support 300 dwellings?? This strikes me as a direct contradiction to Richborough's claim. Sure, there are vacancies in Norwich / Gt Yarmouth etc, so surely it makes sense to locate new housing nearer to an income source.</p> <p>4 - Richborough's flyer details numerous "indicative" areas, I'm rather surprised there aren't ones for an Eiffel Tower or Leaning Tower of Pisa (Nth Walsham lol). My point is you can list anything as indicative, it's reality that counts and how will Richborough be held to account for the delivery of any of these.</p> <p>5 - There are drainage basins on the plan. What isn't on the plan is where will these drain to, or will they just flood onto Little London Road.</p> <p>My final point is this.</p> <p>Should this land be developed then it is lost for all time as part of our countryside, it can never return. Not only will this be a loss of high quality farmland - 2 crops a year - but also nature that uses it, deer, badgers, bats, birdlife will be forced to forage an ever dwindling countryside. There are far more sensible brownfield sites to consider that are nearer better transport links / employment but obviously these incur cost to make them suitable for housing. Have we really reached the point in this country where profit comes first and destruction of wildlife habitats is of secondary concern.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No

If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: The B1145 at the access point mentioned is National Speed limit. Surely provision needs making to bring this into a safe limit. "Provision of a bridge over the Paston Way". What sort of bridge, footbridge, rope bridge?? This needs to be clarified as a 2 lane vehicular access capable of taking the weights of vehicles that will be accessing the site during construction and beyond.</p> <p>As an individual of many years business experience I can see the site being built via the secondary access off Old Mundesley Road, and once built the proposed primary access bridge gets kicked into the long grass. As a sign of commitment to the project and therefore the town I regard it as non- negotiable that the primary access route is constructed first before any development of the site starts.</p> <p>Note is made of access via the B1145 Lyngate Road. This is incorrect, they are 2 totally separate roads. With reference to Lyngate Road, although a 2 lane road, for about 100 metres there is provision for residents to park their cars. This effectively reduces the road to a single carriageway. This road is already a bottleneck.</p> <p>There are drainage basins on the plan. What isn't on the plan is where will these drain to, or will they just flood onto Little London Road.</p> <p>Should this land be developed then it is lost for all time as part of our countryside, it can never return. Not only will this be a loss of high quality farmland - 2 crops a year - but also nature that uses it, deer, badgers, bats, birdlife will be forced to forage an ever dwindling countryside. There are far more sensible brownfield sites to consider that are nearer better transport links / employment but obviously these incur cost to make them suitable for housing</p>
Officer Response	<p>Comments noted. The site-specific policy does not reference a specific design for the bridge as the policy is written to allow flexibility in the approach taken, the design of any access over Paston Way will be determined and considered through the application process. The principle of the suitability of the access is already established through the site assessment process (see Appendix 1 of the Additional Sites Review Background Paper) and the Highway Authority support the site and its access arrangements, having advised that a Transport Assessment will be required as part of any application. Provision of an access onto the B1145 is a policy requirement identified in the site-specific policy.</p> <p>The site-specific policy includes the requirement for a Surface Water Management Plan to demonstrate that greenfield run off rates from the site are not increased. The policy also includes a requirement for a Foul Drainage Strategy that will provide details of any enhancements and set out how additional foul flows will be accommodated within the foul sewerage network, this will be delivered prior to the occupation of any dwellings.</p> <p>The site-specific policy includes the mitigation and enhancement of the County Wildlife Site and existing mature trees and hedgerows, the site will also be required to provide Open Space in compliance with the Local Plan.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC143
Response Date	05/12/2024 16:51:00
Full Name	Dr June Sherlock
Organisation	
Agent Full Name	
Agent Organisation	

<p>Does the Proposed Change contribute to the overall soundness of the Plan?</p>	<p>Increased housing will affect the B1150 road from North Walsham to the NDR and Norwich.</p> <p>Already the road through Coltishall has become utterly unsuitable for the volume of traffic passing through it. This is not just in terms of volume but the size of vehicles using a road and bridge that are not fit for their purpose</p> <p>It has already been pointed out by the police and by emergency service that the pinch points are on Station Road, on the bridge crossing the river Bure and the so called triangle where the fuel station is located.</p> <p>On station road there is a severe danger to pedestrians using the footpath, and undoubtedly car drivers are breaking the law in theory by having no option but to mount the kerb when coming nose to nose with massive 10-wheel trucks. I admire the drivers of such vehicles who must negotiate this nerve-wracking slalom called Coltishall.</p> <p>The bridge is obviously only wide enough to take a single larger vehicle which includes the buses, caravans during the holiday seasons, and the increasing number of larger articulated vehicles. Hold-ups are inevitable. Accidents are not infrequent and major hold-ups have already occurred due to the narrow sharp bend at the fuel station.</p> <p>In addition to these existing significant motorised traffic issues, is the issue for pedestrians. The noise and pollution is already awful for anybody living or walking along the route, and dangerous for those wishing to cross the road at the pharmacy/butcher location, and especially at the fuel station location where the Wroxham traffic going the B1150 and at the Recruiting Sergeant location where a mini-roundabout makes things even more complicated for pedestrians to cross with traffic from the Buxton Road and given that the bus stop is located on either side of this road, this is piling risk upon risk for non-motorists. Children daily have to cross this road to use the buses. On top of this there is the issue of parents wishing to walk with children to the Coltishall school who need to cross safely. It is paramount that major consideration should be given to pedestrians. Given the latest New Highway Code favouring the safety of pedestrians this must take priority.</p> <p>I walk to the mini-roundabout daily and have observed several times in the four years I have lived here accidents occurring at the roundabout, short tempers, mistakes being made. The level of traffic noise is horrendous, not just along the stretch between the mini roundabout and the bridge, but also up the hill towards Norwich where the pavement is so narrow, a pedestrian - or two - can be inches away from the massive wheels of these articulated Lorries.</p> <p>The roundabout itself is treated as a starting grid and is often more like the Nurnburg ring on a Sunday when one would hope for a quieter day to have a break from the big trucks. Given the recent addition on the Buxton Road of Mick George gravel lorries, Horstead and Coltishall is being bombarde from all directions with an unsustainable level of traffic.</p> <p>In conclusion, to expect Coltishall and Horstead to be able to cope with yet another significant increase in traffic flowing from the housing proposals for North Walsham is dangerous and foolhardy in the extreme.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>Object: Increased housing will affect the B1150 road from North Walsham to the NDR and Norwich. Already the road through Coltishall has become utterly unsuitable for the volume of traffic passing through it. already been pointed out by the police and by emergency service that the pinch points are on Station Road, on the bridge crossing the river Bure and the so called triangle. The bridge is obviously only wide enough to take a single larger vehicle which includes the buses, caravans during the holiday seasons, and the increasing number of larger articulated vehicles. Hold-ups are inevitable. Accidents are not infrequent and major hold-ups have already occurred.</p> <p>The noise and pollution is already awful for anybody living or walking along the route, and dangerous for those wishing to cross the road at the pharmacy/butcher location, and especially at the fuel station location where the Wroxham traffic going the B1150 and at the Recruiting</p>

	<p>Sergeant location where a mini-roundabout makes things even more complicated for pedestrians to cross with traffic from the Buxton Road and given that the bus stop is located on either side of this road, this is piling risk upon risk for non-motorists. Children daily have to cross this road to use the buses. The level of traffic noise is horrendous, not just along the stretch between the mini roundabout and the bridge, but also up the hill towards Norwich where the pavement is so narrow, a pedestrian - or two - can be inches away from the massive wheels of these articulated Lorries.</p> <p>In conclusion, to expect Coltishall and Horstead to be able to cope with yet another significant increase in traffic flowing from the housing proposals for North Walsham is dangerous and foolhardy in the extreme.</p>
Officer Response	<p>Comments noted. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider road network can be mitigated (See exam docs, D19 & EH011e). As a result of the previous hearing sessions that took place in January - March 2023, revised wording for NW62/A has been provided and agreed to by the Council which will incorporate specific measures for the mitigation of impacts on the B1150 and Coltishall.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC164
Response Date	07/12/2024 18:01:16
Full Name	Kevin Hemp
Organisation	
Agent Full Name	Kevin Hemp
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Access to would cause bottle neck on Lyngate Road.</p> <p>Good quality agricultural land grade(3a) being used, whilst lots of other Brownfield sites available in and around Nth Walsham.</p> <p>Concerns with regards to Anglian Water - with respects of dealing with the foul water and surface water that they have so far failed to address in this area of North Walsham</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	As this website is impossible to navigate or understand to enable me to submit my objective views across.
File (where submitted)	
Officer Summary	Object: Good quality agricultural land grade(3a) being used, whilst lots of other Brownfield sites available in and around Nth Walsham. Concerns with regards to Anglian Water - with respects of dealing with the foul water and surface water that they have so far failed to address in this area of North Walsham
Officer Response	<p>Comments noted. The site is predominantly within Grade 3 agricultural land and also Grade 2, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.</p> <p>The site-specific policy includes the requirement for a Surface Water Management Plan to demonstrate that greenfield run off rates from the site are not increased. The policy also includes a requirement for a Foul Drainage Strategy that will provide details of any</p>

	enhancements and set out how additional foul flows will be accommodated within the foul sewerage network, this will be delivered prior to the occupation of any dwellings.
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC169
Response Date	08/12/2024 11:20:13
Full Name	Mrs Samantha McLean-Dietz
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I have lived in North Walsham for over 50 years and as such, have seen the town evolve and grow. I have never submitted opposition against a development before but having viewed the proposal from Richborough I must comment as follows:</p> <ul style="list-style-type: none"> • If 330 new homes are built, based on a conservative average of three people per household then that is an estimate of approximately 1000 persons increase. I do not believe that there are 1000 homeless in North Walsham so this development is essentially aimed at incomers. I reject the argument that this would serve to house local young people as it is widely reported throughout the country that most young people are unable to afford the deposit on a new home. • Within my memory there has only ever been two doctors' surgeries, two junior schools and now only the secondary school when there used to be the additional Boys' Grammar School and Girls' High School (now amalgamated to form Paston Sixth Form College). This surely means that any population increase will cause a further strain on these educational services. • Other infrastructure problems could be overworking the sewage system and treatment works (I am aware of the underground site at Swafield bridge), the lack of dentists' surgeries, attempting to police and deter potential rises in crime due to population increase. There is also little job opportunity to sustain employment for additional people. • I believe that most modern households have use of two cars. On that rationale, the development would attract another 600+ cars to the area. The proposed highways alteration of adding a roundabout and bridge would increase the risk of traffic accident especially on the main Mundesley Road bypass where the Lyngate Road junction leads to the northern half of the industrial estate. This is already an accident blackspot. Should a new bridge and roundabout not transpire, the alternative route, is traffic coming through the Acorn Road housing estate, bringing air pollution and cars legally travelling up to 30 m.p.h. on roads adjacent to a children's play park. • Due to the new development being so far out of town, in my opinion, most people will drive to their destination even if it is only to the town centre which already suffers from congestion, whilst the Travel Hub and train station for public transportation are a minimum of twenty minutes' walk for the fit and healthy. • I believe that the neighbouring village of Swafield will also be adversely affected with further traffic swell as their village is intersected by the only road going directly to Mundesley from North Walsham. • The effect on the Acorn Road housing estate can only be surmised but I would state that it is probable that the character of the estate will be changed. At present, I can vouch for the fact that it is a very quiet and safe place to live, with next to no crime (as far as I am aware) and no night activity whatsoever. The proposed development will increase the risk of this scenario being changed for the worse, with a rise in population situated in such close proximity. • The proposed development site will be built on a greenfield site. It is aesthetically pleasing for the residents of the Acorn Road housing estate to have fields nearby and I see dog-walkers, walkers and runners enjoy using the footpath that is located at the edge of the proposed site. This path leads onto Little London Road, a quaint, countryside, single-lane road, full of wildlife at the moment. Only one field further is situated NWT Pigney's Wood Nature Reserve. The overspill of wildlife from the reserve that the surrounding area enjoys at present will be adversely affected by the detrimental factors that are undeniably present on the outskirts of town and city developments, namely, the loss of habitat, wildlife disturbance, litter and fly-tipping. • North Walsham has already been expanded by the two Norwich Road developments, that is, the old Smedleys site and further out from town past the water towers, plus that of Long Barrow Drive. Then we already have proposals in the pipeline for the old Paston playing field off Station Road, that of North Walsham Garden Centre and the Walsham West development.

	<p>Surely this must have fulfilled a small town's quota for new builds without cramming another 330 onto a small field in the countryside?</p> <p>Finally, in my experience generally, the developer shows the public its plans, obtains permission to build the development, only to drop the plans for the community-related proposals such as open spaces and cycle routes to simply build the houses which was the profitable part of the proposal</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	The development directly impacts people living in the vicinity of the proposed development and we should be given the opportunity to comment.
File (where submitted)	
Officer Summary	<p>Object: If 330 new homes are built, based on a conservative average of three people per household then that is an estimate of approximately 1000 persons increase. I do not believe that there are 1000 homeless in North Walsham so this development is essentially aimed at incomers. I reject the argument that this would serve to house local young people as it is widely reported throughout the country that most young people are unable to afford the deposit on a new home.</p> <p>Any population increase will cause a further strain on these educational services. Other infrastructure problems could be overworking the sewage system and treatment works (I am aware of the underground site at Swafield bridge), the lack of dentists' surgeries, attempting to police and deter potential rises in crime due to population increase. There is also little job opportunity to sustain employment for additional people.</p> <p>The proposed highways alteration of adding a roundabout and bridge would increase the risk of traffic accident especially on the main Mundesley Road bypass where the Lyngate Road junction leads to the northern half of the industrial estate. This is already an accident blackspot. Should a new bridge and roundabout not transpire, the alternative route, is traffic coming through the Acorn Road housing estate, bringing air pollution and cars legally travelling up to 30 m.p.h. on roads adjacent to a children's play park.</p> <p>Due to the new development being so far out of town, in my opinion, most people will drive to their destination even if it is only to the town centre which already suffers from congestion. I believe that the neighbouring village of Swafield will also be adversely affected with further traffic swell as their village is intersected by the only road going directly to Mundesley from North Walsham. The effect on the Acorn Road housing estate can only be surmised but I would state that it is probable that the character of the estate will be changed.</p> <p>The proposed development site will be built on a greenfield site. It is aesthetically pleasing for the residents of the Acorn Road housing estate to have fields nearby and I see dog-walkers, walkers and runners enjoy using the footpath that is located at the edge of the proposed site. This path leads onto Little London Road, a quaint, countryside, single-lane road, full of wildlife at the moment.</p> <p>North Walsham has already been expanded. Surely this must have fulfilled a small town's quota for new builds without cramming another 330 onto a small field in the countryside? Finally, in my experience generally, the developer shows the public its plans, obtains permission to build the development, only to drop the plans for the community-related proposals such as open spaces and cycle routes to simply build the houses which was the profitable part of the proposal.</p>
Officer Response	<p>Comments noted. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p> <p>The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider road network can be mitigated (See exam docs, D19 & EH011e). Built development will not be located immediately adjacent to Little London Road. No vehicular access is being provided via Acorn Road - this access is pedestrian/cycle only.</p>

	The site-specific policy includes the mitigation and enhancement of the County Wildlife Site and existing mature trees and hedgerows, the site will also be required to provide Open Space in compliance with the Local Plan.
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC179
Response Date	08/12/2024 23:04:00
Full Name	Nigel Ward
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: NW does not have capacity to cope. The NW16 will create carnage with extra traffic 330 homes will equate to another 660 cars in an already heavy congested area. The lack of Schools, GPs, Dentists, and infrastructure such as roundabouts near NR16. The loss of agricultural land, wildlife is of enormous concern to. Brown fieldsites have not been looked at in different locations. The huge impact NR16 will have on other local villages with traffic at Coltishal and Horstead. the bottle neck in Norfolk. I would also add NNDC Website to object is dreadful making bit extremely difficult to object. I was given this email to make my objection.
Officer Response	<p>Comments noted. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Education capacity information is provided by the Education Authority and financial contributions will be considered through the application process in line with Developer contribution policy HC4. The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning in Health Protocol. The protocol presents a process describing how relevant NHS organisations, Norfolk & Suffolk County Councils, Public Health and the Norfolk and East Suffolk Local Planning Authorities jointly engage to ensure that health considerations are adequately accounted for in plan making and in planning applications and their subsequent developments so that the appropriate authorities can plan and priorities investment(s). Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p> <p>The site-specific policy includes the mitigation and enhancement of the County Wildlife Site and existing mature trees and hedgerows, the site will also be required to provide Open Space in compliance with the Local Plan. The Council has a Brownfield Register, there are no suitable sites on this register to accommodate the required growth needed as set out in Policy SS1.</p> <p>The Council is satisfied that the consultation was conducted fairly and proportionately, and that appropriate publicity was undertaken in line with our normal practices. A significant level of response has been received, indicating a good level of awareness and it is clear that a broad range of concerns (or supporting comments) have been communicated.</p> <p>The consultation has followed the same process for each stage of Local Plan production and is in-line with the statutory requirements. The Council uses software developed by a reputable and experienced global organisation and is used by hundreds of organisations across the UK including a multitude of local planning authorities to whom this platform was specifically developed.</p>

Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC180
Response Date	06/12/2024 09:24:00
Full Name	Mr Frederick Oldershaw
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	I would like to be kept informed of the proposed change to the farmland at the end of Mundesley Road, North Walsham. My main concern is the increased congestion this would bring to the area especially at the junction at Lyngate Road - which is already very busy and dangerous at times due to the parking outside the shop.
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	This proposal has already, rightly, been rejected previously. The reasons for rejection still apply.
File (where submitted)	
Officer Summary	Object: This proposal has already, rightly, been rejected previously. The reasons for rejection still apply.
Officer Response	<p>Comments noted. The initial HELAA assessment undertaken in 2017 identifies the site as unsuitable based on its impacts on the wider road network. The site's access and other factors were considered suitable at the time. The HELAA assesses sites individually and is a high-level desktop study that informed the early plan process and the districts capacity for residential development, it does not identify allocations and is not the full assessment that informed the Local Plan (this is found in Exam Doc, D3 & Appendix 1 of the Additional Sites Review Background Paper). The full site assessment process is explained in Background paper 6 - Development Site Selection Methodology [Examination Reference C6]. Assessment of the site as expressed in the Site Assessment Booklet (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider network can be mitigated (See exam docs, D19 & EH011e).</p> <p>Assessment of the site as expressed in the Site Assessment Booklet in the Local Plan's Examination Library (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Further assessment of the site is provided in Appendix 1 of the Additional Sites Review Background Paper.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC181
Response Date	07/12/2024 09:17:00
Full Name	Geoff Stichbury
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am registering my objection to the proposed development site NW16 on Mundesley Road North Walsham.</p> <p>Medical services in particular as well as other local infrastructure are already severely stretched in the town</p> <p>(A recent date for a doctors appointment was given as 7 weeks !)</p> <p>The site has previously been rejected as unsuitable.</p> <p>What makes it suitable now ?</p>

Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: Medical services in particular as well as other local infrastructure are already severely stretched in the town. The site has previously been rejected as unsuitable.
Officer Response	<p>Comments noted. The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning in Health Protocol. The protocol presents a process describing how relevant NHS organisations, Norfolk & Suffolk County Councils, Public Health and the Norfolk and East Suffolk Local Planning Authorities jointly engage to ensure that health considerations are adequately accounted for in plan making and in planning applications and their subsequent developments so that the appropriate authorities can plan and priorities investment(s).</p> <p>Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p> <p>The initial HELAA assessment undertaken in 2017 identifies the site as unsuitable based on its impacts on the wider road network. The site's access and other factors were considered suitable at the time. The HELAA assesses sites individually and is a high-level desktop study that informed the early plan process and the districts capacity for residential development, it does not identify allocations and is not the full assessment that informed the Local Plan (this is found in Exam Doc, D3 & Appendix 1 of the Additional Sites Review Background Paper). The full site assessment process is explained in Background paper 6 - Development Site Selection Methodology [Examination Reference C6]. Assessment of the site as expressed in the Site Assessment Booklet (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider network can be mitigated (See exam docs, D19 & EH011e).</p> <p>Assessment of the site as expressed in the Site Assessment Booklet in the Local Plan's Examination Library (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Further assessment of the site is provided in Appendix 1 of the Additional Sites Review Background Paper.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC184
Response Date	09/12/2024 10:06:00
Full Name	Mr Mark Seager
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>The increase in housing in North Norfolk is not taking into account all of the extra traffic that will use the B1150 to Norwich. The bridge in Coltishall/ Horstead cannot cope with the current traffic volumes- the bridge is totally unsuitable for HGVs and the volume of traffic. Already several accidents have occurred and vehicles regularly mount the pavements as it is so narrow- inevitably deaths will occur.</p> <p>HGVs should be banned and a by pass is urgently required</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	

File (where submitted)	
Officer Summary	Object: The increase in housing in North Norfolk is not taking into account all of the extra traffic that will use the B1150 to Norwich. The bridge in Coltishall/ Horstead cannot cope with the current traffic volumes- the bridge is totally unsuitable for HGVs and the volume of traffic. Already several accidents have occurred and vehicles regularly mount the pavements as it is so narrow- inevitably deaths will occur. HGVs should be banned and a by pass is urgently required.
Officer Response	Comments noted. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider road network can be mitigated (See exam docs, D19 & EH011e).
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC217
Response Date	10/12/2024 15:59:00
Full Name	Mr Richard Moore
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Overview.</p> <p>I oppose this Site's residential development, previously rejected in 2017 by NNDC as unsuitable because:-Edge of Town Green Field Site, loss of Grade 1 Farmland in open Countryside, remote from Schools & Healthcare, no Bus Routes & remote from Transport Hub, Railway Station & Supermarkets, increase in Traffic congestion, limited local Employment, No guarantee of adequate affordable Housing to meet local needs, majority of houses at cost afforded: by incomers, not locals. So essentially, nothing has changed at this time in 2024, except increase in housing & population, the same inadequate conditions apply today. Planning Document suggests that NW62/a & NW01/6 can provide a more sustainable development, a higher quantum of housing & potential of providing significant local strategic benefits & closer to Town. Ref.local Plan 19/1/22 by NNDC & Site Assessment Reg. 19.</p> <p>Access.</p> <p>Existing Accesses to the Site at Mundesley Road & Acorn Road are not deemed suitable by NNDC, due to added volume of traffic, hence a new access is proposed via construction of a new Roundabout on B1145 & new Bridge over Paston,Way, into the NW corner of the Site. The cost of this Access provision would be a prohibitive on-cost in relation to sale of the proposed houses. Additional land to west of Paston way requires to be purchased for this transport road access link, at additional expense. This additional land required for Site access is in addition to NW16 cost.</p> <p>Location.</p> <p>The site is in the countryside & is grade 1 agricultural land. As a country we don't already produce enough of our own food which necessitates imports. Also Labour's drive to net zero is starting to install solar farms on Norfolk's agricultural land. This ever increasing loss of our food productive land cannot be justified. As increasingly we will have to import more & more produce, which will not help the drive to net zero. This is a National scandal!</p> <p>The area itself is a beautiful landscape, which is a wonderful asset to not only existing immediate residents, but to the Town, it must not be concreted over.</p> <p>Ecology.</p> <p>The Site & adjacent area, has a very varied selection of wildlife & birds. A survey by Richborough Estates found dunnoek, bullfinch, songthrush, yellow hammer, red kite, buzzard, all declining species in recent years. Also, there are batts, the rare barbastelle bat, hedgehog, field mice, schrews, deer, muntjac & badgers, swans, mallard, kingfisher, amongst many others.</p> <p>The Site has Paston Way on the Western boundary & further to the south there is the ancient historic & iconic Dilham Canal, both offering exceptional benefits. The Site includes a County Wildlife Site encompassing the Paston Way Trail. This development would have serious impacts on these areas. The Site could support over 1,000 residents & therefore, their leisure & other activities, could put these delicate areas at risk, their wildlife. flora & fauna.</p> <p>Safety.</p>

	<p>For those walking into Town & mums with pushchairs, Mundestey Road generally very busy, only has one roadside footpath, quite narrow & with the extra population increase, this is likely to become dangerous for them. The Site is at least 1km from the Town, Doctors, Dentists, etc. & even further from the Library, Bus Terminal, Station & Leisure facilities, Infants & Junior Schools 1.5km walk. Not everyone can walk that far & back, particularly difficult for the elderly & disabled - the Site is basically in the countryside away from essential Infrastructure. There are no existing local Bus routes near the Site.</p> <p>Developments already Approved.</p> <p>Services - Water.</p> <p>The existing AWA Water supply is via the two North Walsham Water Towers, there were built to provide for 5,000 homes, This supply is far overstretched with a low pressure & cannot adequately support the additional planned homes, with estimated consumption of 322bn litres. Additional infrastructure will be required to provide this supply.</p> <p>The above surveys, findings, observations & comments, would without question, indicate that this Site NW16 is totally unsuitable for consideration for development of any kind & certainly not Resident development, as listed below:-</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>Object: previously rejected in 2017 by NNDC as unsuitable because:-Edge of Town Green Field Site, loss of Grade 1 Farmland in open Countryside, remote from Schools & Healthcare, no Bus Routes & remote from Transport Hub, Railway Station & Supermarkets, increase in Traffic congestion, limited local Employment, No guarantee of adequate affordable Housing to meet local needs, majority of houses at cost afforded: by incomers, not locals.</p> <p>Existing Accesses to the Site at Mundesley Road & Acorn Road are not deemed suitable by NNDC, due to added volume of traffic, hence a new access is proposed via construction of a new Roundabout on B1145 & new Bridge over Paston Way, into the NW corner of the Site. The cost of this Access provision would be a prohibitive on-cost in relation to sale of the proposed houses. Additional land to west of Paston way requires to be purchased for this transport road access link, at additional expense. This additional land required for Site access is in addition to NW16 cost.</p> <p>The site is in the countryside & is grade 1 agricultural land. As a country we don't already produce enough of our own food which necessitates imports. Also Labour's drive to net zero is starting to install solar farms on Norfolk's agricultural land.</p> <p>The Site & adjacent area, has a very varied selection of wildlife & birds. A survey by Richborough Estates found dunnock, bullfinch, songthrush, yellow hammer, red kite, buzzard, all declining species in recent years. Also, there are bats, the rare barbastelle bat, hedgehog, field mice, shrews, deer, muntjac & badgers, swans, mallard, kingfisher, amongst many others. The Site has Paston Way on the Western boundary & further to the south there is the ancient historic & iconic Dilham Canal, both offering exceptional benefits. The Site includes a County Wildlife Site encompassing the Paston Way Trail. This development would have serious impacts on these areas.</p> <p>The development, it has been estimated, is likely to produce around an additional 1,200 vehicle movements per day. Locally road infrastructure is not capable of absorbing that amount, Lyngate Road is already jammed at peak times. This is exasperated by large Lorries to & from Sainsburys & others. The Town is similarly problematic with narrow congested streets. The Local Premier Shop on Mundesley Road at the junction of Lyngate Road is already an accident waiting to happen, with parked & turning busses & articulated vehicles, this development will cause dangerous chaos here.</p> <p>Most Employment will be sort in the Norwich area. This means that the increase in vehicles of 1,200 a day will be passing through the already problematic congested Coltishall, with no alternative route. For those walking into Town & mums with pushchairs, Mundestey Road generally very busy, only has one roadside footpath, quite narrow & with the extra population increase, this is likely to become dangerous for them.</p> <p>Existing Health Care provision is virtually non existent as Doctors are basically full & it can take up to 4 weeks to get an appointment. NHS Dentists are non existent, only taking on Private Patients, Nursing Homes are full & emergency care is at Cromer Hospital. There are</p>

limited School places available & a new Primary School has already been identified as requiring to be built. Number of homes is totally unsustainable in light of the existing services, infrastructure, utilities & retail offer, being only a small Market Town.

The existing AWA Water supply is via the two North Walsham Water Towers, there were built to provide for 5,000 homes, This supply is far overstretched with a low pressure & cannot adequately support the additional planned homes, with estimated consumption of 322bn litres. Additional infrastructure will be required to provide this supply.

Officer Response

Comments noted. The initial HELAA assessment undertaken in 2017 identifies the site as unsuitable based on its impacts on the wider road network. The site's access and other factors were considered suitable at the time. The HELAA assesses sites individually and is a high-level desktop study that informed the early plan process and the districts capacity for residential development, it does not identify allocations and is not the full assessment that informed the Local Plan (this is found in Exam Doc, D3 & Appendix 1 of the Additional Sites Review Background Paper). The full site assessment process is explained in Background paper 6 - Development Site Selection Methodology [Examination Reference C6]. Assessment of the site as expressed in the Site Assessment Booklet (D3) concludes the site is *suitable but not taken further* as it was not required at the time. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider network can be mitigated (See exam docs, D19 & EH011e). Assessment of the site as expressed in the Site Assessment Booklet in the Local Plan's Examination Library (D3) concludes the site is *suitable but not taken further* as it was not required at the time. Further assessment of the site is provided in Appendix 1 of the Additional Sites Review Background Paper.

The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. The site-specific policy includes the mitigation and enhancement of the County Wildlife Site and existing mature trees and hedgerows, the site will also be required to provide Open Space in compliance with the Local Plan.

The site is predominantly within Grade 3 agricultural land and also Grade 2, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.

Education capacity information is provided by the Education Authority and financial contributions will be considered through the application process in line with Developer contribution policy HC4. The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning in Health Protocol. The protocol presents a process describing how relevant NHS organisations, Norfolk & Suffolk County Councils, Public Health and the Norfolk and East Suffolk Local Planning Authorities jointly engage to ensure that health considerations are adequately accounted for in plan making and in planning applications and their subsequent developments so that the appropriate authorities can plan and priorities investment(s). Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy.

Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (C4, Page 25). Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well. The site-specific policy includes the requirement for a Surface Water Management Plan to demonstrate that greenfield run off rates from the site are not increased. The policy also includes a requirement for a Foul Drainage Strategy that will provide details of any

	<p>enhancements and set out how additional foul flows will be accommodated within the foul sewerage network, this will be delivered prior to the occupation of any dwellings.</p> <p>Nutrient Neutrality mitigation is not required for sites in North Walsham as described in the assessment of NW16 in Appendix 1 of the Additional Sites Review Background Paper.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC228
Response Date	11/12/2024 15:21:00
Full Name	Mr & Mrs D Lake
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Opposition - Mundesley development</p> <p>If in 2017 the green field site was not passed, WHY NOW??</p> <p>Nothing in NW has changed there are still 2 supermarkets a school and two doctors surgeries and dentist that the traffic have to negotiate Mundesley Rd & Lyngate road are horrendous now.</p> <p>The doctors are full, Dentists are the same N/Walsham haven't the infrastructure for 300 plus cars & houses its the wrong side of the town - and it don't seem safe for a exit onto the bypass, as the cars travel fast after leaving Swafield.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	To voice my opinions
File (where submitted)	
Officer Summary	<p>Object: If in 2017 the green field site was not passed, WHY NOW?? Nothing in NW has changed there are still 2 supermarkets a school and two doctors surgeries and dentist that the traffic have to negotiate Mundesley Rd & Lyngate road are horrendous now.</p> <p>The doctors are full, Dentists are the same N/Walsham haven't the infrastructure for 300 plus cars & houses its the wrong side of the town - and it don't seem safe for a exit onto the bypass, as the cars travel fast after leaving Swafield.</p>
Officer Response	<p>Comments noted. The initial HELAA assessment undertaken in 2017 identifies the site as unsuitable based on its impacts on the wider road network. The site's access and other factors were considered suitable at the time. The HELAA assesses sites individually and is a high-level desktop study that informed the early plan process and the districts capacity for residential development, it does not identify allocations and is not the full assessment that informed the Local Plan (this is found in Exam Doc, D3 & Appendix 1 of the Additional Sites Review Background Paper). The full site assessment process is explained in Background paper 6 - Development Site Selection Methodology [Examination Reference C6]. Assessment of the site as expressed in the Site Assessment Booklet (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider network can be mitigated (See exam docs, D19 & EH011e). Assessment of the site as expressed in the Site Assessment Booklet in the Local Plan's Examination Library (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Further assessment of the site is provided in Appendix 1 of the Additional Sites Review Background Paper.</p> <p>Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application.</p>

Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC230
Response Date	10/12/2024 15:49:00
Full Name	Mrs Claire Bendall
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p><u>Richborough housing proposal</u></p> <p>I am writing to express my concern over the proposed housing development at the end of this road. Coming alongside the government's hard-line response to 'nimbys' and 'blockers', I don't suppose personal attachment to a patch of nature counts for much but I, and many others would miss this access to open countryside which would inevitably become urbanised. There is also the loss of good agricultural land and increase in traffic. This road has become very congested, particularly down from Lyngate Rd with huge vehicles accessing the bypass.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: I don't suppose personal attachment to a patch of nature counts for much but I, and many others would miss this access to open countryside which would inevitably become urbanised. There is also the loss of good agricultural land and increase in traffic. This road has become very congested, particularly down from Lyngate Rd with huge vehicles accessing the bypass.
Officer Response	Comments noted. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application.
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC241
Response Date	11/12/2024 17:13:00
Full Name	Mrs Debbie Mack
Organisation	Historic Environment Planning Adviser Historic England
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>UNSOUND</p> <p>Whilst there are no designated heritage assets within the site boundary, the grade II listed Thatched Cottage lies immediately to the north west of the site. The grade II* Quaker Meeting house lies to the north west of the site.</p> <p>Any development of the site therefore has the potential to impact the setting of the grade II listed building</p> <p>We understand that a Heritage Impact Assessment has been prepared for this site in Document C10 (https://www.north-norfolk.gov.uk/media/8921/c10-paper-10-historic-impact-assessment-updated.pdf).</p> <p>The findings of the HIA including any recommendations for mitigation/enhancement, should be used to inform revised policy wording.</p>

	<p>There is currently no mention of the listed building in the proposed policy wording, nor of any proposed mitigation.</p> <p>In reviewing the HIA, Historic England has some recommendations from the HIA that are missing from the policy criteria.</p> <p>It is our view that the impacts, effects and consequent recommendations in the HIA have not been fully taken into account in the policy formulation. To that end, the site-specific requirements for the development of the site would not be effective and would not be consistent with national policy to secure the conservation and enhancement of the historic environment.</p> <p>We therefore recommend that the policy criteria are amended as:</p> <p>3. Retention and enhancement of the existing mature hedgerows and trees along the northern and eastern boundary of the site and retention <u>and strengthening of tree belt associated with the former railway embankment</u>;</p> <p>4. Development should be located to the south of the site with careful attention to site layout and design which incorporates significant open space to the north <u>and north west</u> along with suitable and enhanced landscaping buffer <u>to conserve and enhance the significance of the Thatched Cottage (GII Listed) and Quaker Meeting House (GII* listed)</u>;</p> <p>As currently drafted, the allocation is not consistent with national policy due to impacts on the historic environment and the policy wording is not effective in conserving and enhancing the historic environment. The allocation is therefore, in our view, unsound.</p> <p>The inclusion of this change suggested above would help to ensure that site-specific requirements for development of the site are justified by the findings of the HIA, consistent with national policy and effective in conserving and enhancing the historic environment.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	<p>241218 HE response letter NNLP Further Consult.pdf</p>
<p>Officer Summary</p>	<p>Object: Whilst there are no designated heritage assets within the site boundary, the grade II listed Thatched Cottage lies immediately to the north west of the site. The grade II* Quaker Meeting house lies to the north west of the site. Any development of the site therefore has the potential to impact the setting of the grade II listed building.</p> <p>There is currently no mention of the listed building in the proposed policy wording, nor of any proposed mitigation. In reviewing the HIA, Historic England has some recommendations from the HIA that are missing from the policy criteria. It is our view that the impacts, effects and consequent recommendations in the HIA have not been fully taken into account.</p> <p>Policy Modification Recommendations:</p> <p>3. Retention and enhancement of the existing mature hedgerows and trees along the northern and eastern boundary of the site and retention <u>and strengthening of tree belt associated with the former railway embankment</u>;</p> <p>4. Development should be located to the south of the site with careful attention to site layout and design which incorporates significant open space to the north <u>and north west</u> along with suitable and enhanced landscaping buffer <u>to conserve and enhance the significance of the Thatched Cottage (GII Listed) and Quaker Meeting House (GII* listed)</u>;</p> <p>As currently drafted, the allocation is not consistent with national policy due to impacts on the historic environment and the policy wording is not effective in conserving and enhancing the historic environment. The allocation is therefore, in our view, unsound.</p>
<p>Officer Response</p>	<p>Comments noted. Agree in part to consider modification and amend as necessary. See modification schedule. The Historic Impact Assessment undertaken for this site (C10) takes into account the presence of Thatched Cottage which lies approximately 90m away to the North-West. The assessment concluded that the site will have some impact on the significance of this asset. Policy Criterion 2 of the site-specific policy includes a requirement to retain the north-western portion of the site for open space and to retain and enhance the Paston Way County Wildlife Site, both requirements help mitigate the site's impact on this asset. Additionally, Criterion 4 directs the built development away from the northern boundary of the site, providing further mitigation.</p>

Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC248
Response Date	13/12/2024 12:22:00
Full Name	K & P Stirzaker
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>We oppose the plans for the above. This will cause more traffic along Mundesley Road and especially Lyngate Road. If the end of Mundesley Road is opened for traffic onto new estate this route will be used as a short cut instead of going along B1145 to this new estate. Also people travelling along Bacton Road will use the existing estate to cut through to Mundesley Road causing more traffic problems. There are not enough places for existing residents for Doctors Schools and Dentists (if you can find one) Last time I needed an appointment at the doctors I had to wait three weeks. On a personal note we bought this bungalow on Swafield Rise four years ago mainly for the view, at the time of purchase we were assured that this land would not be built on as it was Grade 1 Agricultural land and planning permission had already been refused in 2017. We have spent a lot of money making the bungalow up to standard, we have also put larger windows in conservatory to take advantage of rear view. Being a bungalow our bedroom is at the rear so we will also be losing all privacy. If this goes ahead our property will probably drop in value (compensation?) These are some of the points against this development there are probably several more. North Walsham can't take any more residents especially at this side of town because people will have to use cars to get anywhere and these roads won't take any more traffic.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: This will cause more traffic along Mundesley Road and especially Lyngate Road. If the end of Mundesley Road is opened for traffic onto new estate this route will be used as a short cut instead of going along B1145 to this new estate. Also people travelling along Bacton Road will use the existing estate to cut through to Mundesley Road causing more traffic problems.</p> <p>There are not enough places for existing residents for Doctors Schools and Dentists (if you can find one). bought this bungalow on Swafield Rise four years ago mainly for the view, at the time of purchase we were assured that this land would not be built on as it was Grade 1 Agricultural land and planning permission had already been refused in 2017. North Walsham can't take any more residents especially at this side of town because people will have to use cars to get anywhere and these roads won't take any more traffic.</p>
Officer Response	<p>Comments noted. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p> <p>The site is predominantly within Grade 3 agricultural land and also Grade 2, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.</p>

The site was not refused planning permission in 2017, no application was formally submitted to the Council at this time. The initial HELAA assessment undertaken in 2017 identifies the site as unsuitable based on its impacts on the wider road network. The site's access and other factors were considered suitable at the time. The HELAA assesses sites individually and is a high-level desktop study that informed the early plan process and the districts capacity for residential development, it does not identify allocations and is not the full assessment that informed the Local Plan (this is found in Exam Doc, D3 & Appendix 1 of the Additional Sites Review Background Paper). The full site assessment process is explained in Background paper 6 - Development Site Selection Methodology [Examination Reference C6]. Assessment of the site as expressed in the Site Assessment Booklet (D3) concludes the site is *suitable but not taken further* as it was not required at the time. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider network can be mitigated (See exam docs, D19 & EH011e).

Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC253
Response Date	13/12/2024 21:01:39
Full Name	Mr & Mrs Neil & Alison Munro
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>We are writing to oppose the development of the land off Mundesley Road, ref NW16 for the following reasons.</p> <p>This development must be considered with the background that an additional 2200 house have already been approved on other locations in the town. Those developments alone are likely to result in a 50% increase in population of the town. This growth will already cause challenges as health, education and transport networks are already stretched to the limit before the 2200 houses are built.</p> <p>Adding a further 330 houses by Mundesley road will only exacerbate the situation.</p> <p>Development over the years has been largely weighted to the North of the town centre, This means that development on this site is even further from the centre and all facilities, making it highly likely that residents will drive into the town. The local roads are already highly congested and the medieval layout of the town with narrow roads means that further traffic cannot be handled, certainly not safely. There is limited car parking which is often full with the current population.</p> <p>The development of this land was rejected in 2017, in part as access was a challenge. To resolve this the developers are proposing a 'primary' access via a bridge and roundabout direct to the new Mundesley road with a 'secondary' access to the old Mundesley road . When they were asked at the NW Town Council meeting how they would ensure the use of the primary access it was clear that they had given this no thought at all. It is therefore highly likely that traffic heading into town would use the already congested old Mundesley road, which again they apparently had not realised was already busy with a bottleneck at the junction of Lyngate road.</p> <p>It was also clear that Richborough had no idea of where the key bottlenecks were and they had done little work on traffic forecasting / planning.</p> <p>Of the 330 houses being proposed only 15% are proposed to be 'affordable'. The rest will be 3 to 4 bedroom family homes. However employment opportunities in the immediate area are highly limited and not of high remuneration, which means those who can afford these will either be retirees moving in to the area or professionals, also moving in to the area.</p> <p>The latter would almost certainly be employed in the Norwich area and travelling there by car or train. However there is already inadequate parking by the station and this assumes that employment would be within easy travelling distance of Norwich Station, which is unlikely.</p> <p>Therefore it should be expected that the majority would drive via the already congested B1150 through Coltishall. The only alternatives are via Wroxham, which is also congested or via the very poor Felmingham Road to the A140. Again the Richborough were not aware of these issues when challenged in the NW Town Council meeting.</p> <p>Environment</p> <p>The proposed development is on high grade agricultural land which slopes down to the River Ant valley with view across the Canal and Pigneys wood. Currently the housing on Swafield Rise and Acorn Road is almost invisible from Pigneys wood due to the fact that Swafield road</p>

	<p>is on a ridge of land with North Walsham below to the South. Housing on this field would be highly intrusive across the entire valley.</p> <p>Currently it is highly fertile and produces two crops a year, the footpath is well used for leisure walkers as is the quiet Little London Lane and Paston way, over which it is planned to build a road bridge which would be highly intrusive.</p> <p>It would seem that the objection raised in 2017 have not been addressed, and the situation is now even less favourable for this development given the considerable increase of traffic from the 2200 houses now planned in the rest of the town.</p> <p>There seem to be two driving forces behind this development being pushed forward in the addition to the original plan, the landowner and Richborough are keen to reap the no doubt considerable rewards for selling the land and developing it, the county council are looking for 'easy' targets where the land is pushed forward by owners in order to meet targets set by central government.</p> <p>All this regardless of whether the plan is reasonable or has negative impacts on the environment and town.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	<p>No</p>
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>Object: This development must be considered with the background that an additional 2200 house have already been approved on other locations in the town. Those developments alone are likely to result in a 50% increase in population of the town.</p> <p>Development over the years has been largely weighted to the North of the town centre, This means that development on this site is even further from the centre and all facilities, making it highly likely that residents will drive into the town. The local roads are already highly congested and the medieval layout of the town with narrow roads means that further traffic cannot be handled, certainly not safely. There is limited car parking which is often full with the current population.</p> <p>The development of this land was rejected in 2017, in part as access was a challenge. It is therefore highly likely that traffic heading into town would use the already congested old Mundesley road, which again they apparently had not realised was already busy with a bottleneck at the junction of Lyngate road.</p> <p>Of the 330 houses being proposed only 15% are proposed to be 'affordable'. The rest will be 3 to 4 bedroom family homes. However employment opportunities in the immediate area are highly limited and not of high remuneration. There is already inadequate parking by the station and this assumes that employment would be within easy travelling distance of Norwich Station, which is unlikely. Therefore it should be expected that the majority would drive via the already congested B1150 through Coltishall. The only alternatives are via Wroxham, which is also congested or via the very poor Felmingham Road to the A140.</p> <p>The proposed development is on high grade agricultural land which slopes down to the River Ant valley with view across the Canal and Pigneys wood. Currently the housing on Swafield Rise and Acorn Road is almost invisible from Pigneys wood due to the fact that Swafield road is on a ridge of land with North Walsham below to the South. Housing on this field would be highly intrusive across the entire valley.</p>
<p>Officer Response</p>	<p>Comments noted. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application.</p> <p>The initial HELAA assessment undertaken in 2017 identifies the site as unsuitable based on its impacts on the wider road network. The site's access and other factors were considered suitable at the time. The HELAA assesses sites individually and is a high-level desktop study that informed the early plan process and the districts capacity for residential development, it does not identify allocations and is not the full assessment that informed the Local Plan (this is found in Exam Doc, D3 & Appendix 1 of the Additional Sites Review Background Paper). The full site assessment process is explained in Background paper 6 - Development Site Selection</p>

	<p>Methodology [Examination Reference C6]. Assessment of the site as expressed in the Site Assessment Booklet (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider network can be mitigated (See exam docs, D19 & EH011e). The requirement to provide affordable housing is in line with the Local Plan's Policies.</p> <p>The site is predominantly within Grade 3 agricultural land and also Grade 2, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.</p> <p>The site-specific policy includes the mitigation and enhancement of the County Wildlife Site and existing mature trees and hedgerows, the site will also be required to provide Open Space in compliance with the Local Plan.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC259
Response Date	15/12/2024 13:45:57
Full Name	Mr Graham Vann
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I oppose this land to be used for housing for the following reasons:</p> <ol style="list-style-type: none"> 1. Site was previously rejected and nothing has changed since this rejection. 2. Destroying beautiful countryside and wildlife habitat 3. Vehicular access will be difficult, proposed routes are already impeded by cars parked on grass verges and on sides of the road which create pinch points for emergency access. 4. North Walsham residents already have difficulty accessing medical services, particularly dentists. 5. The newly housing estates on the B1150 Norwich Road remains undeveloped and is an eyesore; recommence building there.
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	This website is difficult to navigate and I suspect many people have just given up!
File (where submitted)	
Officer Summary	Object: Site was previously rejected and nothing has changed since this rejection. Destroying beautiful countryside and wildlife habitat. Vehicular access will be difficult, proposed routes are already impeded by cars parked on grass verges and on sides of the road which create pinch points for emergency access. North Walsham residents already have difficulty accessing medical services, particularly dentists. The newly housing estates on the B1150 Norwich Road remains undeveloped and is an eyesore; recommence building there.
Officer Response	The initial HELAA assessment undertaken in 2017 identifies the site as unsuitable based on its impacts on the wider road network. The site's access and other factors were considered suitable at the time. The HELAA assesses sites individually and is a high-level desktop study that informed the early plan process and the districts capacity for residential development, it does not identify allocations and is not the full assessment that informed the Local Plan (this

	<p>is found in Exam Doc, D3 & Appendix 1 of the Additional Sites Review Background Paper). The full site assessment process is explained in Background paper 6 - Development Site Selection Methodology [Examination Reference C6]. Assessment of the site as expressed in the Site Assessment Booklet (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider network can be mitigated (See exam docs, D19 & EH011e).</p> <p>The site-specific policy includes the mitigation and enhancement of the County Wildlife Site and existing mature trees and hedgerows, the site will also be required to provide Open Space in compliance with the Local Plan. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC279
Response Date	15/12/2024 19:31:00
Full Name	Mr Michael Parsley
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	I am wrighting to you with my concerns about the proposed housing devilmnt at the end of Mundesley road,this is the second time we have had this in seve years so what has changed Mundesley road has got busyer than ever. The roads like Lyngate road and crow road cannot cope now we all know there will be no new bridge or roundabout on the entrance,because of the cost.It does not matter that we have 35ton lorries and buses trying to go up and down these roads spend a day or more here and see for yourself. Another 660 cars trying to enter north walsham plus we have over 1200 homes being built on the norwich roads the to main supermarkets will not be able to cope the struggle now and that would mean more lorries on the roads mentioned.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: I am wrighting to you with my concerns about the proposed housing devilmnt at the end of Mundesley road,this is the second time we have had this in seve years so what has changed Mundesley road has got busyer than ever. The roads like Lyngate road and crow road cannot cope now we all know there will be no new bridge or roundabout on the entrance,because of the cost.It does not matter that we have 35ton lorries and buses trying to go up and down these roads spend a day or more here and see for yourself. Another 660 cars trying to enter north walsham plus we have over 1200 homes being built on the norwich roads the to main supermarkets will not be able to cope the struggle now and that would mean more lorries on the roads mentioned.
Officer Response	Comments noted. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider road network can be mitigated (See exam docs, D19 & EH011e).
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC280
Response Date	16/12/2024 11:15:01

Full Name	Becky Furr
Organisation	Parish Clerk Horstead with Stanninghall Parish Council
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>OBJECTION</p> <p><u>Response to North Norfolk District Council's Public Consultation in respect of site NW16 (Land at End of Mundesley Road, North Walsham)</u>, on behalf of the Coltishall & Horstead B1150 Special Interest Group, (including Coltishall & Horstead Parish Councils, County & District Councillors).</p> <p>Coltishall & Horstead B1150 Special Interest Group objects to housing allocation NW16 (Land at End of Mundesley Road, North Walsham), we are extremely concerned that an additional 330 homes and the associated population growth in North Walsham will have a further detrimental impact to the B1150 main arterial road through Coltishall & Horstead, as traffic volumes increase. The road has serious width constraints both on Station Road, which cause HGV's to mount the pavement when passing each other breaching rule 145 of the highway code, and also the River Bure Bridge which has caused traffic to become gridlocked on several occasions in recent months. Planning Inspector Mr. David Reed has described the B1150 at Coltishall as 'a sub-optimal route', and our Local Police Inspector has stated 'whilst I recognise there is a risk to those using the pavements, there is also the danger of gridlock causing issues for emergency vehicles trying to navigate the section of road to attend emergencies'. (We have already witnessed several nasty accidents in our village over the last year which have resulted in tailbacks, on one occasion this caused an ambulance on a blue light heading towards Norwich to be delayed for 20 minutes).</p> <p>Notwithstanding our objection to the principal of further development in North Walsham, we require the traffic mitigation measures already agreed within the Statement of Common Ground as part of allocation NW62, to be explicitly written into North Norfolk Local Plan Policy.</p> <p>Furthermore, the consultation process for allocation NW16 (330 homes) will require a transport assessment, and we would like this to examine the wider highway network, particularly appropriate measures & the provision of funding to address traffic congestion in Coltishall on the B1150, measures of which should include, but are not limited to, implementing a heavy goods vehicle 7.5 tonne weight restriction to alleviate the problem of gridlock.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	North Walsham Development will have a detrimental impact to p-estrian safety and traffic travelling through Horstead.
File (where submitted)	
Officer Summary	<p>Object: we are extremely concerned that an additional 330 homes and the associated population growth in North Walsham will have a further detrimental impact to the B1150 main arterial road through Coltishall & Horstead, as traffic volumes increase. The road has serious width constraints both on Station Road, which cause HGV's to mount the pavement when passing each other breaching rule 145 of the highway code, and also the River Bure Bridge which has caused traffic to become gridlocked on several occasions in recent months.</p> <p>Notwithstanding our objection to the principal of further development in North Walsham, we require the traffic mitigation measures already agreed within the Statement of Common Ground as part of allocation NW62, to be explicitly written into North Norfolk Local Plan Policy. Furthermore, the consultation process for allocation NW16 (330 homes) will require a transport assessment, and we would like this to examine the wider highway network, particularly appropriate measures & the provision of funding to address traffic congestion in Coltishall on the B1150, measures of which should include, but are not limited to, implementing a heavy goods vehicle 7.5 tonne weight restriction to alleviate the problem of gridlock.</p>
Officer Response	Comments noted. Agree to consider modification and amend as necessary. See modification schedule. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider road network can be mitigated (See exam docs, D19

	& EH011e). As a result of the previous hearing sessions that took place in January - March 2023, revised wording for NW62/A has been provided and agreed to by the Council which will incorporate specific measures for the mitigation of impacts on the B1150 and Coltishall.
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC282
Response Date	16/12/2024 11:34:23
Full Name	Mrs Becky Furr
Organisation	Parish Clerk Coltishall Parish Council
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>OBJECTION</p> <p><u>Response to North Norfolk District Council's Public Consultation in respect of site NW16 (Land at End of Mundesley Road, North Walsham)</u>, on behalf of the Coltishall & Horstead B1150 Special Interest Group, (including Coltishall & Horstead Parish Councils, County & District Councillors).</p> <p>Coltishall & Horstead B1150 Special Interest Group objects to housing allocation NW16 (Land at End of Mundesley Road, North Walsham), we are extremely concerned that an additional 330 homes and the associated population growth in North Walsham will have a further detrimental impact to the B1150 main arterial road through Coltishall & Horstead, as traffic volumes increase. The road has serious width constraints both on Station Road, which cause HGV's to mount the pavement when passing each other breaching rule 145 of the highway code, and also the River Bure Bridge which has caused traffic to become gridlocked on several occasions in recent months. Planning Inspector Mr. David Reed has described the B1150 at Coltishall as 'a sub-optimal route', and our Local Police Inspector has stated 'whilst I recognise there is a risk to those using the pavements, there is also the danger of gridlock causing issues for emergency vehicles trying to navigate the section of road to attend emergencies'. (We have already witnessed several nasty accidents in our village over the last year which have resulted in tailbacks, on one occasion this caused an ambulance on a blue light heading towards Norwich to be delayed for 20 minutes).</p> <p>Notwithstanding our objection to the principal of further development in North Walsham, we require the traffic mitigation measures already agreed within the Statement of Common Ground as part of allocation NW62, to be explicitly written into North Norfolk Local Plan Policy.</p> <p>Furthermore, the consultation process for allocation NW16 (330 homes) will require a transport assessment, and we would like this to examine the wider highway network, particularly appropriate measures & the provision of funding to address traffic congestion in Coltishall on the B1150, measures of which should include, but are not limited to, implementing a heavy goods vehicle 7.5 tonne weight restriction to alleviate the problem of gridlock.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	The development planned for North Walsham will have a detrimental impact on pedestrian safety and volume of traffic coming through Coltishall. Notwithstanding our objection to the principal of further development in North Walsham, we require the traffic mitigation measures already agreed within the Statement of Common Ground as part of allocation NW62, to be explicitly written into North Norfolk Local Plan Policy.
File (where submitted)	
Officer Summary	<p>Object: we are extremely concerned that an additional 330 homes and the associated population growth in North Walsham will have a further detrimental impact to the B1150 main arterial road through Coltishall & Horstead, as traffic volumes increase. The road has serious width constraints both on Station Road, which cause HGV's to mount the pavement when passing each other breaching rule 145 of the highway code, and also the River Bure Bridge which has caused traffic to become gridlocked on several occasions in recent months.</p> <p>Notwithstanding our objection to the principal of further development in North Walsham, we require the traffic mitigation measures already agreed within the Statement of Common Ground as part of allocation NW62, to be explicitly written into North Norfolk Local Plan Policy. Furthermore, the consultation process for allocation NW16 (330 homes) will require</p>

	a transport assessment, and we would like this to examine the wider highway network, particularly appropriate measures & the provision of funding to address traffic congestion in Coltishall on the B1150, measures of which should include, but are not limited to, implementing a heavy goods vehicle 7.5 tonne weight restriction to alleviate the problem of gridlock.
Officer Response	Comments noted. Agree to consider modification and amend as necessary. See modification schedule. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider road network can be mitigated (See exam docs, D19 & EH011e). As a result of the previous hearing sessions that took place in January - March 2023, revised wording for NW62/A has been provided and agreed to by the Council which will incorporate specific measures for the mitigation of impacts on the B1150 and Coltishall.
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC296
Response Date	15/12/2024 16:35:00
Full Name	John Ford
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Objection to NW16 ~ Land at end of Mundesley Road</p> <p>Quote ~ Mathew Pennycook ~ Housing ~ Communities & Local Government Minister ~ Statement to the Commons on Thursday 12th December 2024</p> <p>Re: Agricultural Land Use ~ <i>"Lowest Quality poorly Performing Land" Brown and Grey Field land should be prioritised for development.</i></p> <p><i>Mathew Pennycook also said ~</i></p> <p><i>"Local Councillors should have input"</i> All our Town Councillors and at least 2 of the District councillors are against the proposal. The Site was rejected in 2017 for many reasons and looking at Richborough Estates proposals ~ in the words of the Town Council ~ Nothing has changed. So why put it forward again. I Suspect the answer is in my summary.</p> <p>THE SITE ~ NW16 ~ Land at the end of Mundesley Road ~ North Walsham</p> <p>The land in question is Grade 2 Agricultural and as such is BMV = Best and Most Versatile Agricultural Land. (NPPF Annex 2 ~ Para 180(a) (b) and 181 footnote 62 which states that ~ The availability of agricultural land used for food production should be considered, alongside the other policies of this Framework, when deciding what sites are most appropriate for development.</p> <p>BMV land has better protection than Non BMV land. It produces 2 crops per year. Very Fertile.</p> <p><i>This proposed development is already at odds with the Minister's express recommendation.</i></p> <p>The Farmer who owns the land has already rather hurriedly dumped tons of topsoil onto areas that showed signs of pooling.</p> <p>In one of your appraisals it was claimed that the Run off of surface water would not be adversely impacted by the development ~ This of course cannot be true ~ an Agricultural Field will absorb far more water than Buildings ~ Roads and solid driveways & this land has several dips and hollows ~ it is not flat.</p> <p>Infiltration is not adequately catered for. Two pools _ but then what? This will adversely affect the Norfolk Wildlife Trust land and Canal at the bottom of the neighbouring field. Through the Vattenfall project ditches have recently been cleared out to try to facilitate drainage but the result is slightly higher level run off into Canal with consequent overflow into the Stream that i believe runs into the River Ant and thence into the Broads. Not good ~ but if you add this development ~ even worse.</p> <p>WATER</p> <p>349 Litres of Water consumption per average household PER DAY</p> <p>370 houses = 370 x 349 = 129,130 extra litres per day</p> <p>= 129,130 x 365 = 47,132,450 litres per year</p> <p>ADD</p> <p>2200 Houses = 2200 x 349 = 767,800 litres extra Per day</p> <p>767,800 x 365 = 280,247,000 EXTRA litres Per Year</p>

= 280,247,000 + 47,132,450 = 327,379,450 litres pa

Will the Aquifers on which Norfolk relies be able to SUPPLY A FURTHER 47MILLION LITRES on top of planned 280 MILLION LITRES without running the WHOLE TOWN DRY in times of drought.

Anglian water appear to be overstretched already without adding such huge volumes of demand on both Run off ~ and Foul Water drainage. Already high levels of dumping of sewage into the Sea at Mundesley. Not acceptable.

Not a reservoir in sight.

Nutrient Neutrality : A development achieves nutrient neutrality when the nutrient load created through additional wastewater (including surface water) from a development is MITIGATED. I see no signs of serious mitigation procedures being put in place.

I know You ~ as professional planners ~ are already aware of all of the above ~ so why would you even consider this additional development? I'm sure the answer lies in my summary below.

GENERAL COMMENT

Having looked through most of the other comments left on your consultation Portal ~ it is obvious that the Traffic volume is a major issue in medieval town streets. How on earth the Town will cope with the large development to the West ~ goodness only knows.

BUT

- NOT ENOUGH DENTISTS
- TWO OVERSTRETCHED DOCTORS SURGERIES
- LITTLE CAPACITY LEFT IN THE LOCAL SCHOOLS
- CAPACITY OF THE MAIN TRAFFIC ROUTE TO NORWICH SEVERLY COMPROMISED BY THE *COLTISHALL BOTTLENECK*.
- LITTLE OR NO BUS SERVICE INTO THE TOWN CENTRE FROM THE MUNDESLEY RD EDGE OF TOWN.
- GRID CAPACITY TO COPE WITH EXTRA ELECTRIC CONSUMPTION (i am given to understand it could be as high as an extra 3.5 MgWhr for just 330 houses) This includes car chargers but since not everyone will have an electric car ~ it may be a bit less.

FINALLY: ~ If the layout of the proposed Development remains in place it will create a wall just some 15 metres (this includes 5metre buffer zone and 10metres of garden) from Existing boundary fences on the Southern side of the Development 6 meters in height - minimum and virtually the whole length of the Field. Where residents currently enjoy views across the Field. I am sure you too would become NIMBY's if faced with the same change in circumstances. The Great Wall of Walsham.

SUMMARY

The NW16 site having been already rejected for sound reasons in 2017 ~ i believe has only been put back into the mix as a direct result of the Government Inspector David Reed applying pressure and it gives NNDC the opportunity to relieve that pressure by trying to go for a quick fix.

It cannot be sensible for all the reasons I and many others have expressed and i believe this has become an addition to the NN Plan for Political Reasons rather than good ~ well thought through ~ Local Planning.

If this application is ultimately approved and if i were a planning officer ~ I would not want this to be my legacy to the Town. It is a nonsensical addition and I am sure most of you in the Planning Office know it.

Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	I want to express my opinion because i would be directly and adversely affected by the development.
File (where submitted)	
Officer Summary	Object: All our Town Councillors and at least 2 of the District councillors are against the proposal. The Site was rejected in 2017 for many reasons and looking at Richborough Estates proposals ~ in the words of the Town Council ~ Nothing has changed. So why put it forward again. I Suspect the answer is in my summary.

The land in question is Grade 2 Agricultural and as such is BMV = Best and Most Versatile Agricultural Land. (NPPF Annex 2 ~ Para 180(a) (b) and 181 footnote 62 which states that ~ The availability of agricultural land used for food production should be considered, alongside the other policies of this Framework, when deciding what sites are most appropriate for development.

In one of your appraisals it was claimed that the Run off of surface water would not be adversely impacted by the development ~ This of course cannot be true ~ an Agricultural Field will absorb far more water than Buildings ~ Roads and solid driveways & this land has several dips and hollows ~ it is not flat. this will adversely affect the Norfolk Wildlife Trust land and Canal at the bottom of the neighbouring field. Through the Vattenfall project ditches have recently been cleared out to try to facilitate drainage but the result is slightly higher level run off into Canal with consequent overflow into the Stream that i believe runs into the River Ant and thence into the Broads. Not good.

Anglian water appear to be overstretched already without adding such huge volumes of demand on both Run off ~ and Foul Water drainage. Already high levels of dumping of sewage into the Sea at Mundesley. Not acceptable. Nutrient Neutrality : A development achieves nutrient neutrality when the nutrient load created through additional wastewater (including surface water) from a development is MITIGATED. I see no signs of serious mitigation procedures being put in place.

Having looked through most of the other comments left on your consultation Portal ~ it is obvious that the Traffic volume is a major issue in medieval town streets. How on earth the Town will cope with the large development to the West ~ goodness only knows.

- NOT ENOUGH DENTISTS
- TWO OVERSTRETCHED DOCTORS SURGERIES
- LITTLE CAPACITY LEFT IN THE LOCAL SCHOOLS
- CAPACITY OF THE MAIN TRAFFIC ROUTE TO NORWICH SEVERLY COMPROMISED BY THE COLTISHALL BOTTLENECK.
- LITTLE OR NO BUS SERVICE INTO THE TOWN CENTRE FROM THE MUNDESLEY RD EDGE OF TOWN.
- GRID CAPACITY TO COPE WITH EXTRA ELECTRIC CONSUMPTION (i am given to understand it could be as high as an extra 3.5 MgWhr for just 330 houses) This includes car chargers but since not everyone will have an electric car ~ it may be a bit less.

FINALLY: ~ If the layout of the proposed Development remains in place it will create a wall just some 15 metres (this includes 5metre buffer zone and 10metres of garden) from Existing boundary fences on the Southern side of the Development 6 meters in height - minimum and virtually the whole length of the Field. Where residents currently enjoy views across the Field. I am sure you too would become NIMBY's if faced with the same change in circumstances. The Great Wall of Walsham.

Officer Response

Comments noted. The initial HELAA assessment undertaken in 2017 identifies the site as unsuitable based on its impacts on the wider road network. The site's access and other factors were considered suitable at the time. The HELAA assesses sites individually and is a high-level desktop study that informed the early plan process and the districts capacity for residential development, it does not identify allocations and is not the full assessment that informed the Local Plan (this is found in Exam Doc, D3 & Appendix 1 of the Additional Sites Review Background Paper). The full site assessment process is explained in Background paper 6 - Development Site Selection Methodology [Examination Reference C6]. Assessment of the site as expressed in the Site Assessment Booklet (D3) concludes the site is *suitable but not taken further* as it was not required at the time. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider network can be mitigated (See exam docs, D19 & EH011e).

The site is predominantly within Grade 3 agricultural land and also Grade 2, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.

	<p>The site-specific policy includes the requirement for a Surface Water Management Plan to demonstrate that greenfield run off rates from the site are not increased. The policy also includes a requirement for a Foul Drainage Strategy that will provide details of any enhancements and set out how additional foul flows will be accommodated within the foul sewerage network, this will be delivered prior to the occupation of any dwellings. Nutrient Neutrality mitigation is not required for sites in North Walsham as described in the assessment of NW16 in Appendix 1 of the Additional Sites Review Background Paper.</p> <p>Education capacity information is provided by the Education Authority and financial contributions will be considered through the application process in line with Developer contribution policy HC4. The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning in Health Protocol. The protocol presents a process describing how relevant NHS organisations, Norfolk & Suffolk County Councils, Public Health and the Norfolk and East Suffolk Local Planning Authorities jointly engage to ensure that health considerations are adequately accounted for in plan making and in planning applications and their subsequent developments so that the appropriate authorities can plan and priorities investment(s). Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p> <p>The site-specific policy does not include the requirement for a 15m high wall along the southern boundary of the site. The Local Plan includes Policy ENV8 - High Quality Design which requires developments to design in such a way that integrates and reflects the character of the area be in conformity with the Design Guide. The specific details of the site's design will be determined through the application process.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC326
Response Date	16/12/2024 08:52:00
Full Name	Adam Banham
Organisation	Broadland District Council
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Elected councillors at Broadland District Council continue to have concerns about traffic volumes through Coltishall and Horstead from new development in North Walsham. The current consultation which includes allocation NW16 will add 330 homes and take total development in North Walsham to approximately 2,480 homes.</p> <p>Broadland District Council believes that traffic mitigations for Coltishall and Horstead should be explicitly written into the supporting text of the North Norfolk Local Plan, because of further transport pressures from development in North Walsham. It is already a matter of common ground that certain highway improvements are required through the centre of Coltishall and Horstead as part of allocation NW62, but due to the proposals for NW16 it is recommended that those improvements are now explicitly written into the Local Plan.</p> <p>Given the consultation on NW16 it is my view that consequential modifications will be needed for Chapter 14, and more needs to be said about highway improvements along the B1150 when introducing the proposals for North Walsham. Under the 'Infrastructure' sub-heading, I suggest that an extra bullet point is added under paragraph 14.0.10, which could say:</p> <p>To address additional traffic using the B1150 through Coltishall and Horstead specific mitigations will be put in place prior to new development being built out. The provisions identified through Coltishall and Horstead are a right-turn lane from the B1150 to the B1354 north of the bridge, the formalised demarcation of a bus stop adjacent to the War Memorial on High Street, as well as improved pedestrian crossing facilities at Ling Way, High Street, and the B1150/B1354 junction.</p> <p>The consultation proposals for NW16 will require a transport assessment and this is an opportunity to take account of the wider highway network, including the B1150. Implementing a Heavy Goods Vehicle (HGV) 7.5T weight restriction on the B1150 in Coltishall is amongst the options, and it could be prudent to include this within the scope of this and other future transport assessments.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	

If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Elected councillors at Broadland District Council continue to have concerns about traffic volumes through Coltishall and Horstead from new development in North Walsham. The current consultation which includes allocation NW16 will add 330 homes and take total development in North Walsham to approximately 2,480 homes.</p> <p>Broadland District Council believes that traffic mitigations for Coltishall and Horstead should be explicitly written into the supporting text of the North Norfolk Local Plan, because of further transport pressures from development in North Walsham. It is already a matter of common ground that certain highway improvements are required through the centre of Coltishall and Horstead as part of allocation NW62, but due to the proposals for NW16 it is recommended that those improvements are now explicitly written into the Local Plan.</p> <p>more needs to be said about highway improvements along the B1150 when introducing the proposals for North Walsham. Under the 'Infrastructure' sub-heading, I suggest that an extra bullet point is added under paragraph 14.0.10, which could say:</p> <p>To address additional traffic using the B1150 through Coltishall and Horstead specific mitigations will be put in place prior to new development being built out. The provisions identified through Coltishall and Horstead are a right-turn lane from the B1150 to the B1354 north of the bridge, the formalised demarcation of a bus stop adjacent to the War Memorial on High Street, as well as improved pedestrian crossing facilities at Ling Way, High Street, and the B1150/B1354 junction.</p> <p>The consultation proposals for NW16 will require a transport assessment and this is an opportunity to take account of the wider highway network, including the B1150. Implementing a Heavy Goods Vehicle (HGV) 7.5T weight restriction on the B1150 in Coltishall is amongst the options, and it could be prudent to include this within the scope of this and other future transport assessments.</p>
Officer Response	<p>Comments noted. Agree to consider modification and amend as necessary. See modification schedule. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider road network can be mitigated (See exam docs, D19 & EH011e). As a result of the previous hearing sessions that took place in January - March 2023, revised wording for NW62/A has been provided and agreed to by the Council which will incorporate specific measures for the mitigation of impacts on the B1150 and Coltishall.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC334
Response Date	17/12/2024 14:30:41
Full Name	Mrs Rowan Harris-Bates
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I strongly object to the proposed development of houses at the end of Mundesley Road and believe that this is the wrong scale and site for such a development. The site was previously rejected and all the reasons for its rejection are still valid. The proposal does nothing to address the shortage of low cost rented social housing for local people requiring accommodation and will simply bring in additional people from outside the area to put a strain on the already stretched resources.</p> <p>I live on Mundesley Road and witness daily the number of potentially dangerous vehicle movements by drivers parking to use the Mundesley Road Stores, many of whom pay little heed to the double yellow lines opposite the shop leaving the road double parked at times, making it increasingly dangerous turning left into Mundesley Road from Lyngate Road. Traffic tails back from the junction with Crow Road and also from the town centre, to get to the bypass often leaving it grid-locked at times, particularly when buses and lorries are trying to pass along Lyngate Road. An extra 330 homes, with an average of two cars per house, would lead to a huge number of additional vehicle movements at key times of the day – work, school, shopping etc. and as the site is on the outskirts of town, I imagine the majority of residents would choose to drive instead of walk for these purposes. Even if the entrance to</p>

	<p>the development was from the bypass then there would still be chaos as the traffic from Sainsbury's (and the only petrol station in town) would inevitably funnel down this route. Thinking that Little London Road could be used for alternative access would be implausible. It is a single-track road which regularly floods, rendering it impassable for several weeks each year.</p> <p>My other primary objection is the unnecessary development of agricultural land. Furthermore, this is productive arable land, which I believe should be kept in production for both environmental reasons and the sake of the nation's future food security. The council should prioritise building on brownfield sites, greyfield sites or renovating existing housing before even considering building on agricultural land.</p> <p>The UK is already one of the most nature-depleted countries in the world, and building on this field will further destroy important habitats for declining bird and insect species including nesting skylarks and house martins swooping to catch insects. I walked along the canal this morning, as I always do, and was lucky enough to spot the kingfisher darting across the water and buzzards soaring overhead. I've spotted an otter once, and regularly hear the secretive water rail, all these species thrive because they are largely undisturbed, and I fear will ultimately disappear if we don't offer them some degree of protection. Both the developers and the council like to promote, quite rightly, both the canal and Pigneys Wood as assets, but sadly the irony is that the pursuit of this development could ultimately lead to the destruction of that which you promote, due to increased noise, disruption, light pollution and extra footfall from both people and dogs. The field also slopes downwards towards the canal, and I fear that there will be increased run off into the water which will not only affect the canal but will feed ultimately into the River Ant and the wider Broads network.</p> <p>I would hope that you would take these objections into consideration before making your final decision, as unsuitable developments shouldn't be pushed through at any cost. I firmly believe that farmers should only be stewards of the land and once lost, that field will be lost forever – I also fear that if permission is granted then the field adjoining the canal will be next.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	<p>No</p>
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>Object: The site was previously rejected and all the reasons for its rejection are still valid. The proposal does nothing to address the shortage of low cost rented social housing for local people requiring accommodation and will simply bring in additional people from outside the area to put a strain on the already stretched resources.</p> <p>I live on Mundesley Road and witness daily the number of potentially dangerous vehicle movements by drivers parking to use the Mundesley Road Stores, many of whom pay little heed to the double yellow lines opposite the shop leaving the road double parked at times, making it increasingly dangerous turning left into Mundesley Road from Lyngate Road. An extra 330 homes, with an average of two cars per house, would lead to a huge number of additional vehicle movements at key times of the day – work, school, shopping etc. and as the site is on the outskirts of town, I imagine the majority of residents would choose to drive instead of walk for these purposes. Thinking that Little London Road could be used for alternative access would be implausible. It is a single-track road which regularly floods, rendering it impassable for several weeks each year.</p> <p>My other primary objection is the unnecessary development of agricultural land. Furthermore, this is productive arable land, which I believe should be kept in production for both environmental reasons and the sake of the nation's future food security. The council should prioritise building on brownfield sites, greyfield sites or renovating existing housing before even considering building on agricultural land. The UK is already one of the most nature-depleted countries in the world, and building on this field will further destroy important habitats for declining bird and insect species including nesting skylarks and house martins swooping to catch insects. The field also slopes downwards towards the canal, and I fear that there will be increased run off into the water which will not only affect the canal but will feed ultimately into the River Ant and the wider Broads network. I firmly believe that farmers should only be stewards of the land and once lost, that field will be lost forever – I also fear that if permission is granted then the field adjoining the canal will be next.</p>
<p>Officer Response</p>	<p>Comments noted. The initial HELAA assessment undertaken in 2017 identifies the site as unsuitable based on its impacts on the wider road network. The site's access and other factors</p>

were considered suitable at the time. The HELAA assesses sites individually and is a high-level desktop study that informed the early plan process and the districts capacity for residential development, it does not identify allocations and is not the full assessment that informed the Local Plan (this is found in Exam Doc, D3 & Appendix 1 of the Additional Sites Review Background Paper). The full site assessment process is explained in Background paper 6 - Development Site Selection Methodology [Examination Reference C6]. Assessment of the site as expressed in the Site Assessment Booklet (D3) concludes the site is *suitable but not taken further* as it was not required at the time. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider network can be mitigated (See exam docs, D19 & EH011e).

The site will be expected to deliver affordable housing in line with the Policy HOU2. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application.

The site is predominantly within Grade 3 agricultural land and also Grade 2, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.

The site-specific policy includes the mitigation and enhancement of the County Wildlife Site and existing mature trees and hedgerows, the site will also be required to provide Open Space in compliance with the Local Plan.

Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC337
Response Date	16/12/2024 10:31:00
Full Name	Jo Copplesstone
Organisation	B1150 Special Interest Group
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Response to North Norfolk District Council's Public Consultation in respect of site NW16 (Land at End of Mundesley Road, North Walsham), on behalf of the Coltishall & Horstead B1150 Special Interest Group, (including Coltishall & Horstead Parish Councils, County & District Councillors).</p> <p>Coltishall & Horstead B1150 Special Interest Group objects to housing allocation NW16 (Land at End of Mundesley Road, North Walsham), we are extremely concerned that an additional 330 homes and the associated population growth in North Walsham will have a further detrimental impact to the B1150 main arterial road through Coltishall & Horstead, as traffic volumes increase. The road has serious width constraints both on Station Road, which cause HGV's to mount the pavement when passing each other breaching rule 145 of the highway code, and also the River Bure Bridge which has caused traffic to become gridlocked on several occasions in recent months. Planning Inspector Mr. David Reed has described the B1150 at Coltishall as 'a sub-optimal route', and our Local Police Inspector has stated 'whilst I recognise there is a risk to those using the pavements, there is also the danger of gridlock causing issues for emergency vehicles trying to navigate the section of road to attend emergencies'. (We have already witnessed several nasty accidents in our village over the last year which have resulted in tailbacks, on one occasion this caused an ambulance on a blue light heading towards Norwich to be delayed for 20 minutes).</p> <p>Notwithstanding our objection to the principal of further development in North Walsham, we require the traffic mitigation measures already agreed within the Statement of Common Ground as part of allocation NW62, to be explicitly written into North Norfolk Local Plan Policy. Furthermore, the consultation process for allocation NW16 (330 homes) will require a transport assessment, and we would like this to examine the wider highway network, particularly appropriate measures & the provision of funding to address traffic congestion in Coltishall</p>

	<p>on the B1150, measures of which should include, but are not limited to, implementing a heavy goods vehicle 7.5 tonne weight restriction to alleviate the problem of gridlock.</p> <p>Cllr. Jo Copplesone Member for Coltishall, Broadland District Council, & Chair of the B1150 Special Interest Group.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: Coltishall & Horstead B1150 Special Interest Group objects to housing allocation NW16 (Land at End of Mundesley Road, North Walsham), we are extremely concerned that an additional 330 homes and the associated population growth in North Walsham will have a further detrimental impact to the B1150 main arterial road through Coltishall & Horstead, as traffic volumes increase. The road has serious width constraints both on Station Road, which cause HGV's to mount the pavement when passing each other breaching rule 145 of the highway code, and also the River Bure Bridge which has caused traffic to become gridlocked on several occasions in recent months.</p> <p>Notwithstanding our objection to the principal of further development in North Walsham, we require the traffic mitigation measures already agreed within the Statement of Common Ground as part of allocation NW62, to be explicitly written into North Norfolk Local Plan Policy. Furthermore, the consultation process for allocation NW16 (330 homes) will require a transport assessment, and we would like this to examine the wider highway network, particularly appropriate measures & the provision of funding to address traffic congestion in Coltishall on the B1150, measures of which should include, but are not limited to, implementing a heavy goods vehicle 7.5 tonne weight restriction to alleviate the problem of gridlock.</p>
Officer Response	<p>Comments noted. Agree to consider modification and amend as necessary. See modification schedule. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider road network can be mitigated (See exam docs, D19 & EH011e). As a result of the previous hearing sessions that took place in January - March 2023, revised wording for NW62/A has been provided and agreed to by the Council which will incorporate specific measures for the mitigation of impacts on the B1150 and Coltishall.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC349
Response Date	19/12/2024 10:29:40
Full Name	Mr Christopher Yardley
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>The current assessment and policy for this site does not adequately address landscape impacts in relation to the wider damaging effects of the proposed development. The current proposals do not make sufficient provision for landscaping to the northern, eastern and western sides of the site to screen and integrate development into the landscape. The land to the north and east particularly are sensitive, intimate and attractive rural landscapes which need to be protected. This is not highlighted sufficiently in the policy. Weight also needs to be given to protecting the amenity and setting of the Paston Way railway cutting - to prevent development 'abutting' it in an unattractive manner</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No

If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: The current assessment and policy for this site does not adequately address landscape impacts in relation to the wider damaging effects of the proposed development. The current proposals do not make sufficient provision for landscaping to the northern, eastern and western sides of the site to screen and integrate development into the landscape. The land to the north and east particularly are sensitive, intimate and attractive rural landscapes which need to be protected. This is not highlighted sufficiently in the policy. Weight also needs to be given to protecting the amenity and setting of the Paston Way railway cutting - to prevent development 'abutting' it in an unattractive manner
Officer Response	Comments noted. The site-specific policy includes appropriate mitigation for the site's impact on landscape in Criterion 2, 3 & 4. Notably, the policy includes a requirement to locate built development towards the southern boundary to provide a buffer along the northern boundary. Criterion 2 already addresses the need to retain and enhance the County Wildlife Site and Paston Way.
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC359
Response Date	17/12/2024 10:37:00
Full Name	Victoria Demetriou-Smith
Organisation	Gladman Developments Ltd
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILE
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	Gladman Letter- Further Sites .pdf
Officer Summary	Object: Have several concerns regarding the selection of land at End of Mundesley Road largely pertaining to the scoring within the HELAA that demonstrates other sites are more suitable for residential development. Promoting Alternative Site: Land at Yarmouth Road (HELAA ref H0164) and a significant portion of Land at Mushroom Farm, A149 (HELAA ref H0165) for residential development. Land at End of Mundesley Road is not the most suitable location for development. Gladman consider that the allocation is therefore unjustified and contrary to the Council's evidence base. Paragraph 2.3.4 states that 'the site is considered suitable and available for development. There are limited constraints on the site.' This is directly contrary to the HELAA which clearly states that the site is not suitable and has a significant constraint. Overall, Gladman consider the allocation of Land at End of Mundesley Road to be unjustified based on the contradictory statements within the HELAA and consultation document. There are suitable alternatives within North Walsham that are suitable and available, such as Land Adjacent to Mushroom Farm, and others that while not considered suitable in the HELAA, can overcome the concerns without the vulnerability of significant infrastructure requirements that pose a risk to the viability and deliverability of the site, and therefore meet housing needs in the short to medium term.
Officer Response	Comments noted. The initial HELAA assessment undertaken in 2017 identifies the site as unsuitable based on its impacts on the wider road network. The site's access and other factors were considered suitable at the time. The HELAA assesses sites individually and is a high-level

	<p>desktop study that informed the early plan process and the districts capacity to accommodate residential development, it does not identify allocations and is not the full assessment that informed the Local Plan (this is found in Exam Doc, D3 & Appendix 1 of the Additional Sites Review Background Paper). The full site assessment process is explained in Background paper 6 - Development Site Selection Methodology [Examination Reference C6]. Assessment of the site (NW16) as expressed in the Site Assessment Booklet (D3) concludes the site is suitable but not taken further as it was not required at the time. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider network can be mitigated (See exam docs, D19 & EH011e). The more detailed site assessment that supports the local plan under site references NW23 and NW24/43 can be found in background paper D3 and concludes that both sites are not considered to be suitable for development.</p> <p>The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing. Assessment of the site (NW16) as expressed in the Site Assessment Booklet in the Local Plan's Examination Library (D3) concludes the site is suitable but not taken further as it was not required at the time. Further assessment of the site is provided in Appendix 1 of the Additional Sites Review Background Paper.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC361
Response Date	11/12/2024 15:53:00
Full Name	Mr & Mrs R Carter
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>As a resident of Mundesley road North Walsham my husband and I would like to put our objections to this proposed development.</p> <p>. We object to the greenfield site loss of our reserve and loss of farmland</p> <p>. We feel the council have land on Cromer road that has sat undeveloped near to the town for at least 30 years where some of the housing needs could be met.</p> <p>. We as residents are poorly served with no bus service after 8 am to Norwich for years.as disabled pensioners we have to drive at present to the station car park to get a bus or train. This is not environmentally sustainable and should not have to rake a car from this end of the town to access drs dentist and all other amenities.</p> <p>However the congestion of our road is seen most of the day with lorry's and some other buses, holiday home carriers to get to the caravan park trying to negotiate Lyngate road, Crow road, Mundesley Road and Bacton Road.</p> <p>There is a very high risk of accidents with traffic entering the Mundesley road from Crow road. Living opposite I have seen very many near misses over the 26 years we have lived here.</p> <p>Should building supply cars and Lorries try to access the site and come down these roads the traffic will be horrendous.</p> <p>If each new house have 2 cars per household this will create further congestion</p> <p>Building bridges over or near the existing bungalows at the end of the Mundesley road will be distressing to local residents.</p> <p>The site is remote from schools and healthcare.</p> <p>If traffic increases as a rat run down Acorn Road could potentially impact on the residents as the road is narrow and potentially a danger to children playing alongside the road by the park.</p> <p>Likely the development is not for local people but incomers</p> <p>There will be more fast traffic coming down the bypass with many more cars and the Lyngate Road is already a blackspot from cars leaving the industrial area particularly in the rush hours.</p> <p>The local shop has many customers who park to shop in the Mundesley Road and will cause congestion or accidents if more traffic is generated by this proposal.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	

If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: We object to the greenfield site loss of our reserve and loss of farmland. We feel the council have land on Cromer road that has sat undeveloped near to the town for at least 30 years where some of the housing needs could be met. We as residents are poorly served with no bus service after 8 am to Norwich for years.as disabled pensioners we have to drive at present to the station car park to get a bus or train.</p> <p>However the congestion of our road is seen most of the day with lorry's and some other buses, holiday home carriers to get to the caravan park trying to negotiate Lyngate road, Crow road, Mundesley Road and Bacton Road. There is a very high risk of accidents with traffic entering the Mundesley road from Crow road. Living opposite I have seen very many near misses over the 26 years we have lived here. If each new house have 2 cars per household this will create further congestion. Building bridges over or near the existing bungalows at the end of the Mundesley road will be distressing to local residents.</p> <p>The site is remote from schools and healthcare. If traffic increases as a rat run down Acorn Road could potentially impact on the residents as the road is narrow and potentially a danger to children playing alongside the road by the park.</p>
Officer Response	<p>North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider road network can be mitigated (See exam docs, D19 & EH011e). No vehicular access is being provided via Acorn Road - this access is pedestrian/cycle only.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC362
Response Date	17/12/2024 17:07:00
Full Name	Martin Jones
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I wish to register my deepest concerns regarding the proposed development site NW16, end of Mundesley Road/ top of Acorn Road.</p> <p>As a resident at the top of Acorn road I am bitterly disappointed that we could lose a beautiful part of our greenbelt area and all the associated wildlife that inhabit that land. This area should also be protected as part of the agricultural environment that contributes widely sustaining our food chain. We can ill afford keep losing this type of land from inappropriate development.</p> <p>I understand it was proposed and rejected as wholly unsuitable in 2017 due to poor accessibility so why has this changed now?</p> <p>As a result of these proposals, not only the NW16 site but with the other 2500 new homes will result in the increased traffic congestion and a massive burden on the current infrastructure of the town.</p> <p>It's bad enough now trying to get a doctors appointment at the moment let alone with the proposed population increase.</p> <p>Leading on to that, I haven't heard any plans to develop the towns' healthcare/ dental footprint facilities.</p> <p>The towns' facilities in all areas presently fall far short in being able to sustain a potential increase population of this proposed scale.</p>
Do you consider it necessary to participate in a public hearing	

session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: As a resident at the top of Acorn road I am bitterly disappointed that we could lose a beautiful part of our greenbelt area and all the associated wildlife that inhabit that land. This area should also be protected as part of the agricultural environment that contributes widely sustaining our food chain. We can ill afford keep losing this type of land from inappropriate development.</p> <p>I understand it was proposed and rejected as wholly unsuitable in 2017 due to poor accessibility so why has this changed now? As a result of these proposals, not only the NW16 site but with the other 2500 new homes will result in the increased traffic congestion and a massive burden on the current infrastructure of the town. The towns' facilities in all areas presently fall far short in being able to sustain a potential increase population of this proposed scale.</p>
Officer Response	<p>Comments noted. The site is not located within the Greenbelt, there is no Greenbelt designation in North Norfolk. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy.</p> <p>The initial HELAA assessment undertaken in 2017 identifies the site as unsuitable based on its impacts on the wider road network. The site's access and other factors were considered suitable at the time. The HELAA assesses sites individually and is a high-level desktop study that informed the early plan process and the districts capacity for residential development, it does not identify allocations and is not the full assessment that informed the Local Plan (this is found in Exam Doc, D3 & Appendix 1 of the Additional Sites Review Background Paper). The full site assessment process is explained in Background paper 6 - Development Site Selection Methodology [Examination Reference C6]. Assessment of the site as expressed in the Site Assessment Booklet (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider network can be mitigated (See exam docs, D19 & EH011e). The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC382
Response Date	17/12/2024 17:38:00
Full Name	Amanda Willis
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I have been unable to find the relevant information, via 'the portal' (whatever that is), & have been told that, actually, it has been made deliberately hard to find - which is a bit naughty, to say the least.</p> <p>However, via this e mail, I would like my objection to to the proposal for development off Mundesley Rd, to be noted.</p> <p>It is agricultural land, with a problem of 'pooling', which would adversely affect the building there of houses, as well as affecting nearby streams etc.</p> <p>Plus concerns over increased traffic access, lack of nearby services, to name but very few contraindications for this site. Many other very valid objections have already been made.</p> <p>I wish to express my opinion because I would be directly & adversely affected by the development.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	

If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: I have been unable to find the relevant information, via 'the portal' (whatever that is), & have been told that, actually, it has been made deliberately hard to find - which is a bit naughty, to say the least.</p> <p>It is agricultural land, with a problem of 'pooling', which would adversely affect the building there of houses, as well as affecting nearby streams etc. Plus concerns over increased traffic access, lack of nearby services, to name but very few contraindications for this site. Many other very valid objections have already been made. I wish to express my opinion because I would be directly & adversely affected by the development.</p>
Officer Response	<p>Comments noted. The Council is satisfied that the consultation was conducted fairly and proportionately, and that appropriate publicity was undertaken in line with our normal practices. A significant level of response has been received, indicating a good level of awareness and it is clear that a broad range of concerns (or supporting comments) have been communicated.</p> <p>The consultation has followed the same process for each stage of Local Plan production and is in-line with the statutory requirements. The Council uses software developed by a reputable and experienced global organisation and is used by hundreds of organisations across the UK including a multitude of local planning authorities to whom this platform was specifically developed.</p> <p>The site-specific policy includes the requirement for a Surface Water Management Plan to demonstrate that greenfield run off rates from the site are not increased. The policy also includes a requirement for a Foul Drainage Strategy that will provide details of any enhancements and set out how additional foul flows will be accommodated within the foul sewerage network, this will be delivered prior to the occupation of any dwellings. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC400
Response Date	18/12/2024 12:08:00
Full Name	
Organisation	ESCO Developments, Flagship Housing Group & Lovell Partnerships
Agent Full Name	Sarah Hornbrook
Agent Organisation	Associate (Planning) Bidwells LLP
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>This Representation has been prepared by Bidwells LLP on behalf of ESCO Developments Ltd, Flagship Housing Developments Ltd and Lovell Partnerships Ltd (hereafter 'ESCO', 'Flagship', 'Lovell' or collectively, 'the Consortium'), who are promoting land North West of North Walsham (Site NW62/A) for residential-led development of approximately 1,800 dwellings, 7ha of employment land, community facilities and associated infrastructure.</p> <p>Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16) – is not considered to be sound as currently drafted as it is not justified or effective.</p> <p>The Proposed Change is not justified as it is not clear whether the proposed allocation of NW16 is based on proportionate evidence. The site was previously rejected as an allocation for a number of reasons, summarised in the Council's "First Draft Local Plan (Part1) Alternatives Considered" document [B6] as follows:</p> <p>The site is reasonably remote from the town centre and Mundesley Road NW16 services. It would be an extension into open countryside and could have an adverse impact on the landscape. Highways access and the local network are considered to be unsuitable.</p> <p>Whilst we are aware that Richborough Estates, NW16's site promoter, prepared a suite of reports to support the promotion of the site, these do not form part of the evidence base underpinning the current consultation document, and it is not clear whether that evidence remains up-to-date or is accepted by the Council. Given the concerns raised by the Council about the highways access and accessibility to services in the town centre, it is surprising that Draft Policy NW16 contains no requirements for off-site highways works, or improvements to facilitate sustainable access to the town centre and it is questioned whether this approach</p>

is justified. Site NW62/A was required to undertake significant highways assessment work, and Draft Policy NW62/A includes extensive requirements for mitigation. It is considered that site NW16 should be subject to the same approach, particularly given its location to the north of the town centre which will necessitate all Norwich-bound traffic driving through the town should it come forward in advance of the link road within NW62/A being delivered.

For instance, have the impacts of the site coming forward in isolation been considered (i.e. in the event the NW62/A is delayed or does not come forward) and can the impacts be properly mitigated and the necessary sustainable transport measures implemented? The proposed site needs to illustrate that safe walking and cycling routes are available to the nearby employment area, nearby schools, the town centre and train station. Offsite improvements will be necessary to address gaps on the network and this should be reflected in the policy wording.

In addition, how will the proposed scheme deliver sustainable access and BSIP bus improvement requirements? The policy should highlight the need to address this, as it does for Site NW62/A. Furthermore, have the cumulative impacts and need for mitigation in Coltishall been assessed? Proportional funding towards mitigation should be secured.

In addition, there is no evidence that the impact of the development of NW16 on wider infrastructure including potable and wastewater, electricity/gas supply, education provision and library service has been considered. It is likely that the combined development of NW62/A and NW16 will require substantial investment in infrastructure upgrades, and it is considered that the cost of these should be shared proportionately by the two sites should both be allocated.

Accordingly, the Proposed Change is not considered to be effective as no evidence has been provided to confirm that it is deliverable over the plan period. The site has been put forward by a Land Promoter, and it is not clear if there is any Developer interest. No evidence regarding the site's viability is available, and this is particularly pertinent given the potential requirements for infrastructure upgrades, and other site-specific requirements such as the provision of a bridge over Paston Way.

In order to make the Proposed Change sound in accordance with the NPPF definition, a proportionate evidence base should be prepared, which should include confirmation that the site is deliverable (i.e. suitable, available and viable) within the Plan period, and any requirements for mitigation included in the policy wording.

Notwithstanding the above, we would strongly recommend that the Council consider extending the boundaries of NW62/A as an alternative to allocating NW16. It is clear that the Council consider that North Walsham is an appropriate location to take an additional approximately 300 dwellings and much of the western and southern boundary of NW62/A is drawn fairly arbitrarily (in that it was limited by the land area required to deliver the quantum of development envisaged, rather than any physical constraints). Consequently, there is ample opportunity to extend the boundaries to incorporate another 10 hectares of land (or whatever quantum is considered necessary to deliver approximately 300 additional homes). In addition, the Consortium also controls land to the south of Norwich Road, and the allocation could be extended here too. There would be significant advantages to extending NW62/A rather than allocating NW16, as NW62/A will deliver the infrastructure required to support the additional scale of development now considered appropriate for North Walsham, including the western link road and land for additional educational facilities. By contrast, due to the scale of NW16, it will not be able to deliver any on-site strategic infrastructure and will instead be reliant on NW62/A coming forward. A wealth of evidence has already been prepared to support the allocation of NW62/A; evidence which has been accepted by both NNDC and the Inspector, and a modest extension of the site would not give rise to any additional impacts.

To conclude, it is considered that Proposed Change 3 (the allocation of NW16) is not sound as it is not justified or effective, and the site was previously rejected for good reason. In order to make the Plan sound, it is suggested that the boundaries of NW62/A are extended by approximately 10 hectares to accommodate an additional 300 dwellings. This approach would replicate the Council's approach in both Hoveton and Stalham where Proposed Change 4 and 7 respectively seek to incorporate additional land into the existing proposed allocations.

Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	The Consortium reserve the right to participate in the hearing session(s) to seek to ensure that the issues raised above are fully addressed, and the Proposed Change can be made sound.
File (where submitted)	

<p>Officer Summary</p>	<p>Object: New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16) – is not considered to be sound as currently drafted as it is not justified or effective. The Proposed Change is not justified as it is not clear whether the proposed allocation of NW16 is based on proportionate evidence. The site was previously rejected as an allocation for a number of reasons, summarised in the Council’s “First Draft Local Plan (Part1) Alternatives Considered” document [B6]. NW16’s site promoter, prepared a suite of reports to support the promotion of the site, these do not form part of the evidence base underpinning the current consultation document, and it is not clear whether that evidence remains up-to-date or is accepted by the Council.</p> <p>Given the concerns raised by the Council about the highways access and accessibility to services in the town centre, it is surprising that Draft Policy NW16 contains no requirements for off-site highways works, or improvements to facilitate sustainable access to the town centre and it is questioned whether this approach is justified. Site NW62/A was required to undertake significant highways assessment work, and Draft Policy NW62/A includes extensive requirements for mitigation. It is considered that site NW16 should be subject to the same approach, particularly given its location to the north of the town centre which will necessitate all Norwich-bound traffic driving through the town should it come forward in advance of the link road within NW62/A being delivered.</p> <p>For instance, have the impacts of the site coming forward in isolation been considered (i.e. in the event the NW62/A is delayed or does not come forward) and can the impacts be properly mitigated and the necessary sustainable transport measures implemented? The proposed site needs to illustrate that safe walking and cycling routes are available to the nearby employment area, nearby schools, the town centre and train station. Offsite improvements will be necessary to address gaps on the network and this should be reflected in the policy wording. In addition, how will the proposed scheme deliver sustainable access and BSIP bus improvement requirements? The policy should highlight the need to address this, as it does for Site NW62/A. Furthermore, have the cumulative impacts and need for mitigation in Coltishall been assessed? Proportional funding towards mitigation should be secured.</p> <p>In addition, there is no evidence that the impact of the development of NW16 on wider infrastructure including potable and wastewater, electricity/gas supply, education provision and library service has been considered. It is likely that the combined development of NW62/A and NW16 will require substantial investment in infrastructure upgrades, and it is considered that the cost of these should be shared proportionately by the two sites should both be allocated.</p> <p>Accordingly, the Proposed Change is not considered to be effective as no evidence has been provided to confirm that it is deliverable over the plan period. The site has been put forward by a Land Promoter, and it is not clear if there is any Developer interest. No evidence regarding the site’s viability is available.</p> <p>Notwithstanding the above, we would strongly recommend that the Council consider extending the boundaries of NW62/A as an alternative to allocating NW16. It is clear that the Council consider that North Walsham is an appropriate location to take an additional approximately 300 dwellings and much of the western and southern boundary of NW62/A is drawn fairly arbitrarily (in that it was limited by the land area required to deliver the quantum of development envisaged, rather than any physical constraints). Consequently, there is ample opportunity to extend the boundaries to incorporate another 10 hectares of land (or whatever quantum is considered necessary to deliver approximately 300 additional homes). In addition, the Consortium also controls land to the south of Norwich Road, and the allocation could be extended here too.</p> <p>To conclude, it is considered that Proposed Change 3 (the allocation of NW16) is not sound as it is not justified or effective, and the site was previously rejected for good reason.</p>
<p>Officer Response</p>	<p>Comments noted. The initial HELAA assessment undertaken in 2017 identifies the site as unsuitable based on its impacts on the wider road network. The site’s access and other factors were considered suitable at the time. The HELAA assesses sites individually and is a high-level desktop study that informed the early plan process and the districts capacity for residential development, it does not identify allocations and is not the full assessment that informed the Local Plan (this is found in Exam Doc, D3 & Appendix 1 of the Additional Sites Review Background Paper). The full site assessment process is explained in Background paper 6 - Development Site Selection Methodology [Examination Reference C6]. Assessment of the site as expressed in the Site Assessment Booklet (D3) concludes the site is suitable but not taken further as it was not required at the time, this conclusion is based on evidence submitted during the Regulation 18 consultation and ongoing work during that time to produce the Regulation 19 version of the Local Plan which uses the findings of each Site Assessment Booklet to determine which sites are suitable for allocation.</p> <p>The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application and detailed design issues will be addressed through the application process. Developer contributions would be sought</p>

	<p>as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability. The site-specific policy includes the requirement for a Surface Water Management Plan to demonstrate that greenfield run off rates from the site are not increased. The policy also includes a requirement for a Foul Drainage Strategy that will provide details of any enhancements and set out how additional foul flows will be accommodated within the foul sewerage network, this will be delivered prior to the occupation of any dwellings.</p> <p>Based on ongoing engagement with the relevant promoters. The Council are confident that the site can begin delivery within the first 5 years of the Local Plan's Plan Period.</p> <p>Proposed extension to the boundary of NW62/A is acknowledged. The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing. There is no evidence the additional land proposed can be delivered.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC425
Response Date	19/12/2024 00:20:00
Full Name	Eric Goulden
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>There is insufficient infrastructure to make this proposal tenable. It is far from shops, supermarkets, health centre, dental surgeries etc, there is very little nearby public transport which will mean an increase in private car use. The town cannot begin to accommodate this increase.</p> <p>The proposal is obviously motivated by greed.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	This website is a disgrace. It is almost impossible to navigate and therefore very difficult to register an opinion. It's almost as if it was specifically devised with this end in mind.
File (where submitted)	
Officer Summary	Object: There is insufficient infrastructure to make this proposal tenable. It is far from shops, supermarkets, health centre, dental surgeries etc, there is very little nearby public transport which will mean an increase in private car use. The town cannot begin to accommodate this increase.
Officer Response	<p>Comments noted. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application.</p> <p>Education capacity information is provided by the Education Authority and financial contributions will be considered through the application process in line with Developer contribution policy HC4. The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning in Health Protocol. The protocol presents a process describing how relevant NHS organisations, Norfolk & Suffolk County Councils, Public Health and the Norfolk and East Suffolk Local Planning Authorities jointly engage to ensure that health considerations are adequately accounted for in plan making and in planning applications and their subsequent developments so that the appropriate authorities can plan and priorities investment(s). Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC426
Response Date	19/12/2024 00:22:40

Full Name	Eric Goulden
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>This entire project is unrealistic and ill-considered.</p> <p>The proposed development is a long way from the town centre and, supermarkets and amenities that North Walsham has to offer. There is no viable public transport from the site of the proposed development to the town centre which will mean that the new residents will use their cars. The roads are narrow and mostly residential and there is insufficient parking in the town centre to accommodate this new influx of traffic. There are no shops, health centre, dental surgery, or school anywhere nearby and as I understand it no provision has been made to put any of this essential infrastructure in place.</p> <p>The lack of affordable housing shows that this utterly cynical proposal is motivated by pure greed. It will do nothing for the quality of life of existing residents or those unfortunate enough to end up living in this aberration.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	This website is a disgrace. It is almost impossible to navigate, and therefore very difficult to register an opinion.
File (where submitted)	
Officer Summary	<p>Object: This entire project is unrealistic and ill-considered. The proposed development is a long way from the town centre and, supermarkets and amenities that North Walsham has to offer. There is no viable public transport from the site of the proposed development to the town centre which will mean that the new residents will use their cars. The roads are narrow and mostly residential and there is insufficient parking in the town centre to accommodate this new influx of traffic.</p> <p>There are no shops, health centre, dental surgery, or school anywhere nearby and as I understand it no provision has been made to put any of this essential infrastructure in place. The lack of affordable housing shows that this utterly cynical proposal is motivated by pure greed. It will do nothing for the quality of life of existing residents or those unfortunate enough to end up living in this aberration.</p>
Officer Response	<p>Comments noted. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application.</p> <p>Education capacity information is provided by the Education Authority and financial contributions will be considered through the application process in line with Developer contribution policy HC4. The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning in Health Protocol. The protocol presents a process describing how relevant NHS organisations, Norfolk & Suffolk County Councils, Public Health and the Norfolk and East Suffolk Local Planning Authorities jointly engage to ensure that health considerations are adequately accounted for in plan making and in planning applications and their subsequent developments so that the appropriate authorities can plan and priorities investment(s). Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability. The site will be expected to deliver affordable housing in line with the Policy HOU2.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC427
Response Date	19/12/2024 05:57:05
Full Name	Miss Gina Lui
Organisation	
Agent Full Name	
Agent Organisation	

Does the Proposed Change contribute to the overall soundness of the Plan?	<p>No. I oppose this land to be used for housing for the following reasons:</p> <p>I do not believe that the current infrastructure can sustain a large development in this particular location. The site is remote from the centre and all facilities, making it highly likely that residents will drive into the town, Mundesley Road would become dangerous and a significant bottleneck in various places.</p> <p>This is an edge of Town Green Field Site, and would result in the loss of Grade 1 Farmland in open Countryside. The area is also used by the community for walks and leisure and is currently an asset to the Town, I also believe that the build would result in significant environmental damage.</p> <p>North Walsham residents already have difficulty accessing medical and other social services, so I am obviously concerned about the scale of this new development.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: I do not believe that the current infrastructure can sustain a large development in this particular location. The site is remote from the centre and all facilities, making it highly likely that residents will drive into the town, Mundesley Road would become dangerous and a significant bottleneck in various places.</p> <p>This is an edge of Town Green Field Site, and would result in the loss of Grade 1 Farmland in open Countryside. The area is also used by the community for walks and leisure and is currently an asset to the Town, I also believe that the build would result in significant environmental damage. North Walsham residents already have difficulty accessing medical and other social services, so I am obviously concerned about the scale of this new development.</p>
Officer Response	<p>Comments noted. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application.</p> <p>The site lies within Grade 3 and Grade 2 agricultural land. The site-specific policy includes the mitigation and enhancement of the County Wildlife Site and existing mature trees and hedgerows, the site will also be required to provide Open Space in compliance with the Local Plan. The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning in Health Protocol. The protocol presents a process describing how relevant NHS organisations, Norfolk & Suffolk County Councils, Public Health and the Norfolk and East Suffolk Local Planning Authorities jointly engage to ensure that health considerations are adequately accounted for in plan making and in planning applications and their subsequent developments so that the appropriate authorities can plan and priorities investment(s).</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC436
Response Date	19/12/2024 08:23:00
Full Name	Jocelyn Rowbotham
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I wish to register my concerns and objections to this proposal. There are many reasons NOT to use this site but here are some I feel worth noting.</p> <p>The access to the site - whilst the general proposal put in by Richborough mentions plans to build a new bridge and road, this is highly unlikely to happen. Also there needs to be more than one entrance/exit to a site this size for health and Safety and access for emergency services, this means the already over stretched Mundesley Road/Lingate Road and Acorn</p>

	<p>Road will undoubtedly be used, as will Little London Lane, which is a single lane road with very few passing areas. The link from Lingate Road to the Bypass is already noted as an accident black spot, so more traffic will increase the risks to life.</p> <p>The environmental damage to the surrounding areas, including the River Ant from run off and pollution.</p> <p>The surface drainage will increase causing more flooding to Little London lane.</p> <p>Ancient trees and hedgerows will be at risk because despite the Developer's statement/promise about protecting them, this rarely happens and we have had experience of this with the development at Mulberry Close North Walsham This fact that developers do not keep their promises regarding the environment also cited in the Wild Justice Report recently published.</p> <p>The likelihood of any affordable housing actually being built here is remote, especially if a new road and bridge are to be built. Therefore it will be higher cost housing with a posable token gesture to affordability. There is little or no need for more of these types of houses in North Walsham, or even in North Norfolk as we are over burdened with 'executive' housing. If any housing is needed it should be low cost or Social housing, that those on local incomes could afford to buy or rent. The housing market in the area for mid to 'executive' range is fairly stagnant, in fact it is slow for all housing but I acknowledge this changes.</p> <p>There are empty properties that could be renovated/used.</p> <p>There are brownfield sites that could be used instead of prime farmland, we need to focus on farming and more self sufficiency in farming in this uncertain world.</p> <p>There is no work or very, very limited work in the area so this would increase the need for people to travel, putting pressure on the road system as the train is not sufficient for this. Therefore pollution and damage to the roads will increase.</p> <p>I ask you to turn down this application and also to consider if many of the other applications are actually in the best interests of the District which you serve, and not bow to Government overreach and demands.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>Object: The access to the site - whilst the general proposal put in by Richborough mentions plans to build a new bridge and road, this is highly unlikely to happen. Also there needs to be more than one entrance/exit to a site this size for health and Safety and access for emergency services, this means the already over stretched Mundesley Road/Lingate Road and Acorn Road will undoubtedly be used, as will Little London Lane, which is a single lane road with very few passing areas. The link from Lingate Road to the Bypass is already noted as an accident black spot, so more traffic will increase the risks to life.</p> <p>The environmental damage to the surrounding areas, including the River Ant from run off and pollution. The surface drainage will increase causing more flooding to Little London lane. Ancient trees and hedgerows will be at risk because despite the Developer's statement/promise about protecting them, this rarely happens and we have had experience of this with the development at Mulberry Close North Walsham This fact that developers do not keep their promises regarding the environment also cited in the Wild Justice Report recently published.</p> <p>The likelihood of any affordable housing actually being built here is remote, especially if a new road and bridge are to be built. Therefore it will be higher cost housing with a posable token gesture to affordability.</p> <p>There are brownfield sites that could be used instead of prime farmland, we need to focus on farming and more self sufficiency in farming in this uncertain world. There is no work or very, very limited work in the area so this would increase the need for people to travel, putting pressure on the road system as the train is not sufficient for this. Therefore pollution and damage to the roads will increase.</p> <p>I ask you to turn down this application and also to consider if many of the other applications are actually in the best interests of the District which you serve, and not bow to Government overreach and demands.</p>

Officer Response	<p>Comments noted. The provision of access and a bridge over Paston Way is required by the site-specific policy for NW16. The policy also identifies a requirement to provide an access from the B1145 and Mundesley Road, no vehicular is being provided from Acorn Road - access will be pedestrian/cycle only. No access is being provided on Little London Road. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application.</p> <p>The site-specific policy includes the requirement for a Surface Water Management Plan to demonstrate that greenfield run off rates from the site are not increased. The policy also includes a requirement for a Foul Drainage Strategy that will provide details of any enhancements and set out how additional foul flows will be accommodated within the foul sewerage network, this will be delivered prior to the occupation of any dwellings. There are no ancient woodland designations on-site. The site-specific policy includes the mitigation and enhancement of the County Wildlife Site and existing mature trees and hedgerows, the site will also be required to provide Open Space in compliance with the Local Plan.</p> <p>The Council has a Brownfield Register, there are not enough sites on this register to accommodate the required growth needed as set out in Policy SS1 and many potential brownfield sites are unsuitable due to location or other constraints.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC458
Response Date	18/12/2024 11:49:00
Full Name	Andrew Allen
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>This Site was turned down in 2017 for many good reasons. All of these reasons still stand today and should be used to turn this current application down now.</p> <p>The Land is Grade 2 Agricultural. It should be used to feed our people. The land produces two crops per year and could be used to supply local people with food thereby helping our sustainability footprint.</p> <p>There will be an adverse affect on the nearby Norfolk Wildlife Trust Land and also the North Walsham and Dilham Canal which is being brought back into use.</p> <p>The amount of traffic that this development would bring is unsustainable for surrounding roads.</p> <p>Local services, dentist, doctors will not be able to cope.</p> <p>Any new houses that need to be built in North Walsham should be tagged into the area where there are already 1700 plus homes planned and where access roads etc have been planned and properly thought out. Little London is still an area of some beauty with local people walking their dogs and with good rural views to both sides.</p> <p>This is a lazy idea with no thought to residents and or the area.</p> <p>I object to any houses being built on this site, even though I am not directly affected by it.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: This Site was turned down in 2017 for many good reasons. All of these reasons still stand today and should be used to turn this current application down now.</p> <p>The Land is Grade 2 Agricultural. It should be used to feed our people. The land produces two crops per year and could be used to supply local people with food thereby helping our sustainability footprint. There will be an adverse affect on the nearby Norfolk Wildlife Trust Land and also the North Walsham and Dilham Canal which is being brought back into use.</p> <p>The amount of traffic that this development would bring is unsustainable for surrounding roads. Local services, dentist, doctors will not be able to cope. Any new houses that need to</p>

	be built in North Walsham should be tagged into the area where there are already 1700 plus homes planned. This is a lazy idea with no thought to residents and or the area.
Officer Response	<p>Comments noted. The initial HELAA assessment undertaken in 2017 identifies the site as unsuitable based on its impacts on the wider road network. The site's access and other factors were considered suitable at the time. The HELAA assesses sites individually and is a high-level desktop study that informed the early plan process and the districts capacity for residential development, it does not identify allocations and is not the full assessment that informed the Local Plan (this is found in Exam Doc, D3 & Appendix 1 of the Additional Sites Review Background Paper). The full site assessment process is explained in Background paper 6 - Development Site Selection Methodology [Examination Reference C6]. Assessment of the site as expressed in the Site Assessment Booklet (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider network can be mitigated (See exam docs, D19 & EH011e).</p> <p>The site is predominantly within Grade 3 agricultural land and also Grade 2, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.</p> <p>The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC471
Response Date	19/12/2024 10:08:00
Full Name	Ms G Mircoli
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>My main objection is that this is a greenfield site and once planning is allowed on such sites, it will continue to happen. Surely we need to retain as much farmland as possible on this small island in this uncertain world. Future generations will be cheated if greenfield sites of any kind are continually eaten up.</p> <p>This site was previously rejected as unsuitable so why has this changed now? It still stands that the site is remote from schools, healthcare and transport links so is not easily accessible to the town centre and supermarkets. There is no guarantee that there will be significant affordable housing that locals need. Obviously, too, traffic will increase causing further congestion throughout the area. There are significant developments proposed in the town already. How will the services in the town cope? Why are the water companies not investing in sewage treatment plants as populations increase? Flooding seems to be a rising threat across the world now. The developers point out that the southern area of the NW16 site is prone to flooding. How sure can they be that the 'basin' they propose to provide to counteract this will be sufficient?</p> <p>Why are other brownfield sites not put forward? Victory housing next to Waitrose is now empty surely this would be a prime location for small affordable living units. Also, Homebase in Cromer is closing and would prove to be a popular living area, especially being by the sea but on high ground, up the hill therefore safer from coastal erosion.</p> <p>Is the local population the prime consideration in planning policy or the need to meet targets regardless of their impact and to help developers increase their profits?</p>

Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: My main objection is that this is a greenfield site and once planning is allowed on such sites, it will continue to happen. Surely we need to retain as much farmland as possible on this small island in this uncertain world. Future generations will be cheated if greenfield sites of any kind are continually eaten up.</p> <p>This site was previously rejected as unsuitable so why has this changed now? It still stands that the site is remote from schools, healthcare and transport links so is not easily accessible to the town centre and supermarkets. There is no guarantee that there will be significant affordable housing that locals need. Obviously, too, traffic will increase causing further congestion throughout the area. There are significant developments proposed in the town already.</p> <p>Flooding seems to be a rising threat across the world now. The developers point out that the southern area of the NW16 site is prone to flooding. How sure can they be that the 'basin' they propose to provide to counteract this will be sufficient? Why are other brownfield sites not put forward? Victory housing next to Waitrose is now empty surely this would be a prime location for small affordable living units. Also, Homebase in Cromer is closing and would prove to be a popular living area, especially being by the sea but on high ground, up the hill therefore safer from coastal erosion.</p>
Officer Response	<p>Comments noted. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. The initial HELAA assessment undertaken in 2017 identifies the site as unsuitable based on its impacts on the wider road network. The site's access and other factors were considered suitable at the time. The HELAA assesses sites individually and is a high-level desktop study that informed the early plan process and the districts capacity for residential development, it does not identify allocations and is not the full assessment that informed the Local Plan (this is found in Exam Doc, D3 & Appendix 1 of the Additional Sites Review Background Paper). The full site assessment process is explained in Background paper 6 - Development Site Selection Methodology [Examination Reference C6]. Assessment of the site as expressed in the Site Assessment Booklet (D3) concludes the site is <i>suitable but not taken further</i> as it was not required at the time. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider network can be mitigated (See exam docs, D19 & EH011e).</p> <p>The site-specific policy includes the requirement for a Surface Water Management Plan to demonstrate that greenfield run off rates from the site are not increased. The policy also includes a requirement for a Foul Drainage Strategy that will provide details of any enhancements and set out how additional foul flows will be accommodated within the foul sewerage network, this will be delivered prior to the occupation of any dwellings. The Council has a Brownfield Register, there are not enough sites on this register to accommodate the required growth needed as set out in Policy SS1 and many potential brownfield sites are unsuitable due to location or other constraints.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC489
Response Date	19/12/2024 09:12:00
Full Name	Mr Gerry Hermer
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>I would like to register my objection to the above plan. My reasons for this decision are explained in this email. I am aware that there is already a plan to build 1800 new homes, this</p>

new plan, I understand, is for a further 330 homes making a total of 2130 new homes in North Walsham. North Walsham is the largest town in North Norfolk with the most direct route to Norwich is via the B1150 passing through Coltishall and Horstead.

I have lived in the Coltishall area for 45 years. Initially, I served in the RAF at Coltishall as a search and rescue helicopter pilot and after the end of my service I worked at Norwich Airport until retirement in 2017. Over this extensive period I travelled through Coltishall and Horstead daily to my place of work. I have experienced an astonishing increase in traffic flows. The figures given to date are, 95,000 vehicles per week of which approximately 3000 are HGVs. There are no other B roads in Norfolk that experiences anywhere near these traffic flows.

I am aware that the planned new build of houses will result in a population increase in excess of 40%. This will clearly result in a further substantial growth in traffic on the B1150.

I will now cover the problems which the current level of traffic causes in the two villages.

- 1 The bridge over the River Bure. This was built over 100 years ago and is too narrow for opposing HGVs to pass each other and also smaller vehicles are reluctant to attempt to cross when there is an opposing HGV. This results in delays from both directions and extensive tailbacks due to the level of traffic.
- 2 Moving further north to abeam the petrol station is a right angle bend to the left. HGVs are unable to maintain the left side of the road due to the width of the carriage way and the angle of the bend. Moreover, there is a parking space immediately after the apex which is normally occupied. The result of this is that HGVs need to utilise a proportion of the opposite carriage way in order to complete the manoeuvre. Whilst this is happening the traffic on both sides effectively stop with tailbacks occurring.
- 3 Moving on from the bend, the traffic will be in the High Street. There is parking on both sides. Much of the time there is insufficient width for opposing traffic which involves waiting for a gap before the delayed vehicles can proceed. Furthermore, there is a Bus Stop where the bus has to remain in the active lane causing traffic to wait until it is ready to move on.
- 4 The next problem is at the end of the High Street, where there is a tight right hand bend. On coming traffic from both directions cannot see opposing vehicles until they are almost at the apex of the bend. This is a very serious problem. HGVs need to partially move into the opposite carriageway just prior to rounding the bend, they do this without being able to see oncoming traffic. Several weeks ago I was taking my grand-daughter to school by car via the B1150 at Coltishall as I turned into this blind bend from the High Street I noticed an HGV coming towards me with a significant part of it on my side of the road leaving me no room to continue and a real threat of a head on collision. However, I was lucky to be able to make an immediate swerve into Hautbois Road. If there had been a car at the Hautbois Road Junction a collision would have been inevitable.

Here is another relevant incident from a member of the public who wrote to the B1150 Group:

"The reason I'm writing to you today is that this morning at 9:10 I experienced the the following incident at the corner from the High Street and Station Road. One HGV coming from North Walsham and one coming from Norwich met at the corner. The lorry from Norwich was not able to see the oncoming due to the corner and was forced to mount the pavement. Being young and able I was able to jump out of the way from the oncoming Norwich lorry, but let me be clear, if this was a mother with children or an elderly person walking a dog the result would have been serious injury or death."

On Station Road there are several stretches where the road width is less than the width of two HGVs. The result of this is HGVs are using the pavements to proceed when meeting opposite HGV traffic on a daily basis. This is contrary to Rule 145 of the Highway Code and an offence under the Road Traffic Act and more importantly this action is extremely dangerous for pedestrians. I have attached a photograph illustrating a lorry on the pavement. Also I consider that HGV drivers should never be put in a situation where he has to break the law to achieve his task.

Below is a list of some recent incidents which I am aware of taking place on the B1150 in the two villages:

- 1 An HGV demolished a flint wall behind the pavement on the bend opposite the petrol station.
- 2 An HGV collided with a school bus on the bend opposite the petrol station.
- 3 Two HGVs attempting to cross the Bure Bridge causing an ambulance on blue lights to be delayed for 20 minutes.
- 4 An ambulance on blue lights delayed by an HGV on the Station Road / High Street bend. This was resolved by the ambulance driver going on the opposite carriage way without being able to see any on coming traffic in order to reduce the delay. This was a desperate measure with a high risk of a head on collision.

Following my RAF experience of search and rescue operations, my time as a civilian helicopter pilot mainly consisted of air ambulance work as I was a founder of the East Anglian Air

	<p>Ambulance and I also flew police operations on the Norfolk police helicopter. I have therefore been involved in the aftermath of numerous road traffic incidents and accordingly well aware of the urgency required to take injured and seriously ill patients to hospital as quickly as possible when any delay may have very serious consequences.</p> <p>I have been a member of the B1150 Special Interest Group since its inception. It has become clear to our team that with the current traffic levels including HGVs that the B1150 through the two villages is no longer fit for purpose and is also a serious threat to road safety including pedestrians. The root cause of the current problems is the huge increase in traffic volumes caused by the continual expansion of North Walsham. Any further expansion must include a transport plan which can overcome this unacceptable situation. A temporary mitigation should be restricting HGV traffic to 7.5 tonne weight.</p> <p>I believe my comments above describe my justification for my objection to your proposal. I have attached several photos of incidents which occurred recently in Coltishall.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	FC489 - Gerry Hermer.pdf
Officer Summary	<p>Object: I would like to register my objection to the above plan. My reasons for this decision are explained in this email. I am aware that there is already a plan to build 1800 new homes, this new plan, I understand, is for a further 330 homes making a total of 2130 new homes in North Walsham. North Walsham is the largest town in North Norfolk with the most direct route to Norwich is via the B1150 passing through Coltishall and Horstead. I am aware that the planned new build of houses will result in a population increase in excess of 40%. This will clearly result in a further substantial growth in traffic on the B1150.</p> <p>The bridge over the River Bure. This was built over 100 years ago and is too narrow for opposing HGVs to pass each other and also smaller vehicles are reluctant to attempt to cross when there is an opposing HGV. This results in delays from both directions and extensive tailbacks due to the level of traffic. HGVs are unable to maintain the left side of the road due to the width of the carriage way and the angle of the bend. Moreover, there is a parking space immediately after the apex which is normally occupied. the traffic will be in the High Street. There is parking on both sides. Much of the time there is insufficient width for opposing traffic which involves waiting for a gap before the delayed vehicles can proceed. Furthermore, there is a Bus Stop where the bus has to remain in the active lane causing traffic to wait until it is ready to move on.</p> <p>The next problem is at the end of the High Street, where there is a tight right hand bend. On coming traffic from both directions cannot see opposing vehicles until they are almost at the apex of the bend. This is a very serious problem. HGVs need to partially move into the opposite carriageway just prior to rounding the bend, they do this without being able to see oncoming traffic. On Station Road there are several stretches where the road width is less than the width of two HGVs.</p>
Officer Response	<p>Comments noted. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider road network can be mitigated (See exam docs, D19 & EH011e). As a result of the previous hearing sessions that took place in January - March 2023, revised wording for NW62/A has been provided and agreed to by the Council which will incorporate specific measures for the mitigation of impacts on the B1150 and Colitshall.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC490
Response Date	18/12/2024 13:50:00
Full Name	
Organisation	Glavenhill Strategic Land
Agent Full Name	Mr

	Philip Atkinson
Agent Organisation	Director Lanpro Services
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>My client objects to Proposed Change 3 as there is already too much planned housing growth focused into North Walsham in the emerging Local Plan. My client understands that the main allocations are suffering from overall scheme viability issues and this has resulting in the removal of sections of the link road proposed from the overall scheme design. Furthermore based on current absorption (new homes sales) rates in the town this new additional site will clearly not be delivered with the emerging Local Plan period and will only cannibalize new homes sales from the other North Walsham allocations proposed and further harm overall viability.</p> <p>Growth Villages where open market and affordable housing needs have been unmet for a considerable period of time and where related delivery rates are known, can be properly understood, are achievable and where delivery within the emerging Local Plan period is guaranteed.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: My client objects to Proposed Change 3 as there is already too much planned housing growth focused into North Walsham in the emerging Local Plan. My client understands that the main allocations are suffering from overall scheme viability issues and this has resulting in the removal of sections of the link road proposed from the overall scheme design. Furthermore based on current absorption (new homes sales) rates in the town this new additional site will clearly not be delivered with the emerging Local Plan period and will only cannibalize new homes sales from the other North Walsham allocations proposed and further harm overall viability.
Officer Response	Comments noted. The delivery of NW62/A and the Link Road are not part of this consultation. The Inspector's response to the Local Plan (July 2024 EH006(f)) recommends that the Land North of Cromer Road included within the boundary of NW62/A be removed however, the remaining provision of the Link Road is still required.
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC495
Response Date	19/12/2024 11:57:00
Full Name	John Haynes
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<ol style="list-style-type: none"> 1. The services and facilities within North Walsham are totally inadequate for the current population (let alone the 2000 plus houses already agreed to develop) Eg If you are lucky enough to see a qualified doctor within 6 weeks you won't be able to park at the surgery! Dentist- no NHS availability and difficult to get on any list Petrol stations- one only with one airline that is frequently out of order Schools,local transport etc all inadequate 2. Development to faraway from town:- Means reliance on private vehicles which would be far too much for existing roads already suffering from super market delivery trucks and buses trying to pass each other on the narrow roads and junctions (pinch points) 3.North Walsham is already a commuter town with people moving in from other areas Existing plans should be affordable and for local people

Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: The services and facilities within North Walsham are totally inadequate for the current population. Dentist- no NHS availability and difficult to get on any list. Petrol stations- one only with one airline that is frequently out of order. Schools, local transport etc all inadequate. Development to faraway from town, Means reliance on private vehicles which would be far too much for existing roads already suffering from super market delivery trucks and buses trying to pass each other on the narrow roads and junctions (pinch points). North Walsham is already a commuter town with people moving in from other areas</p>
Officer Response	<p>Comments noted. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC500
Response Date	19/12/2024 09:29:00
Full Name	Alan Edgar
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p><u>Traffic</u> Primary access point - too busy Traffic to town will use Lyngate Rd (which is narrow and is a problem now) leading to Mundesley Rd. This junction is a nightmare now. Mundesley Rd will be used as access to Sainsbury's via Bacton Rd. The secondary access point will bring traffic down Mundesley Rd and Lyngate Rd to bypass. The site is far from schools, no bus routes, train station is far away, bus hub and supermarkets etc. This is going to make people use their cars more (if they have one). I fear that this application should be turned down as it will be detrimental to North Walsham. The town is struggling with dentists, doctors, schools. <u>This is a Greenfield site.</u></p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: Primary access point - too busy, traffic to town will use Lyngate Rd (which is narrow and is a problem now) leading to Mundesley Rd. This junction is a nightmare now. Mundesley Rd will be used as access to Sainsbury's via Bacton Rd. The secondary access point will bring traffic down Mundesley Rd and Lyngate Rd to bypass. The site is far from schools, no bus routes, train station is far away, bus hub and supermarkets etc.</p>

	The town is struggling with dentists, doctors, schools. <u>This is a Greenfield site.</u>
Officer Response	Comments noted. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC509
Response Date	18/12/2024 16:59:00
Full Name	
Organisation	Richborough Estates
Agent Full Name	Simon Atha
Agent Organisation	Associate Director Boyer on behalf of Richborough
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILE
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	241218 - North Norfolk Local Plan Further Consultation - Representations on behalf of Richborough - Final.pdf
Officer Summary	<p>Support: Overall, as set out within the detail of these representations, Richborough consider that the proposed action plan and changes to the Local Plan would result in a 'sound' Local Plan that is capable of adoption, subject to Main Modifications. We strongly support the proposed allocation of the site for a mixed-use development including approximately 330 dwellings, specialist elderly persons accommodation, public open space and associated on and off-site supporting infrastructure. To reiterate our previous representations, the site is suitable, available and deliverable for development within the first five years of adoption of the plan. The delivery of 330 new market and affordable homes would make a meaningful contribution to the approximate 1,000 dwelling shortfall in the housing requirement identified by the Planning Inspector.</p> <p>Richborough have engaged with the Council over the proposed policy wording under Policy NW16 and have no objections to the wording as drafted. The site-specific requirements proposed through the policy wording are sensible in our view and well understood by Richborough to assist in bringing the development forward in a positive way. The site is largely constraint free of any major impediments to development, save for the usual technical matters to be worked through as part of a forthcoming outline planning application.</p> <p>In respect of phasing and delivery, whilst this would depend on when outline planning permission is granted, there is a firm commitment by Richborough to bring forward the site as soon as possible. Richborough are in the process of preparing an outline planning application (access only) for submission to NNDC before the end of 2024. If outline consent was granted by June 2025 (allowing for a 6 month determination period to include negotiation of the S106 agreement), it would likely take approximately 3 months for the site to be sold to a housebuilder. As there has already been market interest in the site we consider that this is a realistic timeframe. We would expect a reserved matters application to be made by January 2026 alongside a discharge of conditions application. If this were approved by May 2026, we would expect a start on site to be made immediately after with completions from the first</p>

	<p>development parcel soon after in the Autumn of 2026 as there are no significant infrastructure issues that would impact upon immediate delivery from the site (delivery timescales provided within the attachment). The intention is that Richborough's site, NW16, will come forward promptly with dwellings anticipated to be completed on site in 2026. The initial phase of dwellings would be delivered from Mundesley Road with the second phase due to come following construction of the new access from the B1145 and bridge across the Paston Way.</p> <p>A pre-application request for the site was submitted to NNDC on 30th August 2024 (ref: DE21/24/1858). Since this time, several positive meetings have taken place with the case officer and other statutory consultees to explore the technical detail of bringing the site forward. No major technical constraints or obstacles have been identified through the pre-app process that would prevent delivery of the site. A separate pre-app has been undertaken with County Highways over the proposed access arrangements for the site.</p> <p>The Planning Inspector, at paragraph 48 of his initial findings letter (EXAM EH006(f)) sets out at point (i) that whilst additional sites in Fakenham and North Walsham should not be ruled out, they may divert some demand from the large-scale developments already proposed for these towns. Respectfully, this is a point that we do not agree with and will seek to discuss further at the forthcoming additional hearing sessions. In the case of North Walsham, the large scale development proposed is the North Walsham West SUE. Whilst the Inspector raised some concerns over slippage and timescales for delivery being pushed back for two years, it was found to be sound as an allocation for delivery later on in the plan period.</p> <p>Support - Small Growth Villages (Comments regarding this topic will be summarised and responded to under the relevant consultation section)</p>
Officer Response	<p>Comments and support for the identification of NW16 is noted. The Council will continue to engage with the promoters in relation to the site-specific policy and the site's delivery and adoption in the Local Plan. As part of the Council's own engagement with the Highway Authority, they have provided their support for the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. Based on the information provided within the representation, the Council are confident the site begin delivery within the first five years of the Local Plan's Plan Period.</p> <p>Small Growth Villages - Support Welcomed.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC517
Response Date	19/12/2024 17:14:00
Full Name	Mrs Sally East
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>As a local resident I strongly object to any development / building of 330 new homes on the prime farming land at the top of Mundesley Road for the following reasons:</p> <ol style="list-style-type: none"> 1. This is prime agricultural land 2. There are many protected species that live on and around this land including Sky larks the field is full of them spring through to end of autumn, Roe Deer, Bats, Numerous finches, sparrows, robins, wrens, wagtails, Herons, Buzzards, Peregrine falcons, Marsh Harriers, Sparrow hawks, Otters, Water voles, White Egrets, Cranes, Barn Owls. Just to name a few, all this would be impacted and threatened by building in this field. 3. Mundesley road and surrounding roads cannot cope with a potential 600 plus more cars not to forget delivery Lorrie's etc which would service and be owned by people In proposed development, Mundesley road is already a cut through from Trunch Swafeld the industrial estate and surrounding area people don't use the dual Carriageway as the developers suggested! We already find it hard getting out of our drives on Mundesley road by car let alone on foot it sometimes takes me 10-15 minutes to cross over to get into my own drive on foot , by car exiting my house is a nightmare! Even now without further houses being built . We do not have the infrastructure to support houses on our side of north Walsham! 4. There are no schools or doctors or dentists for residents for more houses let alone for those of us who already live in north Walsham 5. This is an area of outstanding natural beauty!

	<p>6. They are already proposing another 2,000 plus houses in north Walsham we do not have infrastructure to support this ! Why do we need more?</p> <p>7. There are plenty of Brown sites that could be built on elsewhere in north Norfolk!</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: This is prime agricultural land. There are many protected species that live on and around this land. Mundesley road and surrounding roads cannot cope with a potential 600 plus more cars not to forget delivery Lorrie's etc which would service and be owned by people In proposed development, Mundesley road is already a cut through from Trunch Swafield the industrial estate and surrounding area people don't use the dual Carriageway as the developers suggested! We do not have the infrastructure to support houses on our side of north Walsham!</p> <p>There are no schools or doctors or dentists for residents for more houses let alone for those of us who already live in north Walsham. This is an area of outstanding natural beauty! They are already proposing another 2,000 plus houses in north Walsham we do not have infrastructure to support this ! Why do we need more? There are plenty of Brown sites that could be built on elsewhere in north Norfolk!</p>
Officer Response	<p>Comments noted. The site is predominantly within Grade 3 agricultural land and also Grade 2, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.</p> <p>The site-specific policy includes the mitigation and enhancement of the County Wildlife Site and existing mature trees and hedgerows, the site will also be required to provide Open Space in compliance with the Local Plan. The Highway Authority support the site and its access arrangements and have advised that a Transport Assessment will be required as part of any application. Evidence provided during the Regulation 18 consultation and additional evidence provided since then, indicates that the impacts on the wider network can be mitigated (See exam docs, D19 & EH011e).</p> <p>Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability. The site is not located within a National Landscape (Previously AONB) designation. The Council has a Brownfield Register, there are not enough sites on this register to accommodate the required growth needed as set out in Policy SS1 and many potential brownfield sites are unsuitable due to location or other constraints.</p>
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC522
Response Date	19/12/2024 11:06:00
Full Name	Tessa Saunders
Organisation	Spatial & Strategic Planning Manager Anglian Water
Agent Full Name	
Agent Organisation	

<p>Does the Proposed Change contribute to the overall soundness of the Plan?</p>	<p>SEE ATTACHED FILES</p> <p>The site is within the North Walsham WRC catchment, which currently has dry weather flow headroom to accommodate the proposed quantum of growth proposed by this site allocation. We agree with Clause 8 but suggest that it is reworded for clarity to state:</p> <p><i>The submission, approval and implementation of a Foul Drainage Strategy providing details of any enhancements and setting out how additional foul flows will be accommodated within the foul sewerage network and delivered demonstrating that there is capacity available in the sewerage network and at the receiving water recycling centre to accommodate wastewater flows from the site prior to occupation of any dwellings;</i></p> <p>The supporting text should explain that developers must undertake pre-planning engagement with Anglian Water at the earliest opportunity to assess infrastructure capacity, and any specific requirements that may be needed to deliver the proposed development, which may include sustainable points of connection to our water supply and wastewater networks to minimise impacts on existing communities and the environment. Some localised network issues would necessitate a foul drainage strategy.</p> <p>There is a rising main to the west of the site that follows the same alignment as the former railway line. Appropriate policy measures should be applied to ensure that developers undertake early engagement with Anglian Water to safeguard our assets and take account of associated easements so that these can continue to be repaired and maintained as necessary. It is noted that the Cadent gas main is referred to in the supporting text which follows a similar alignment.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	<p>Anglian Water Response - Front Page 19.12.24.pdf Appendix 1 WRC Capacity and Dry Weather Flow.pdf</p>
<p>Officer Summary</p>	<p>The site is within the North Walsham WRC catchment, which currently has dry weather flow headroom to accommodate the proposed quantum of growth proposed by this site allocation. We agree with Clause 8 but suggest that it is reworded for clarity to state:</p> <p><i>The submission, approval and implementation of a Foul Drainage Strategy providing details of any enhancements and setting out how additional foul flows will be accommodated within the foul sewerage network and delivered demonstrating that there is capacity available in the sewerage network and at the receiving water recycling centre to accommodate wastewater flows from the site prior to occupation of any dwellings;</i></p> <p>The supporting text should explain that developers must undertake pre-planning engagement with Anglian Water at the earliest opportunity to assess infrastructure capacity, and any specific requirements that may be needed to deliver the proposed development, which may include sustainable points of connection to our water supply and wastewater networks to minimise impacts on existing communities and the environment. Some localised network issues would necessitate a foul drainage strategy.</p> <p>There is a rising main to the west of the site that follows the same alignment as the former railway line. Appropriate policy measures should be applied to ensure that developers undertake early engagement with Anglian Water to safeguard our assets and take account of associated easements so that these can continue to be repaired and maintained as necessary. It is noted that the Cadent gas main is referred to in the supporting text which follows a similar alignment.</p>
<p>Officer Response</p>	<p>Comments noted. Agree to consider modification and amend as necessary. See modification schedule.</p>
<p>Section</p>	<p>Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)</p>
<p>ID</p>	<p>FC533</p>
<p>Response Date</p>	<p>18/12/2024 15:03:00</p>
<p>Full Name</p>	<p>Caroline Jeffrey</p>
<p>Organisation</p>	<p>Principal Planner, Minerals and Waste Policy Norfolk County Council (Minerals & Waste)</p>

Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>We are pleased to note that the following new or extended site allocations recognise the site is within a mineral safeguarding area, and include mineral safeguarding requirements within the following policies:</p> <ul style="list-style-type: none"> • Land West of Pine Tree Farm, Cromer (Policy C22/4) • Land East of Tunstead Road, Hoveton (Policy HV01/C) • Land at Brumstead Road, Stalham (Policy ST04/A) • Land Adjacent Ingham Road, Stalham (Policy ST19/B) • Land off Cromer Road & Church Lane, Mundesley (Policy MUN03/A) <p>The following site allocations are within a Minerals Safeguarding Area (sand and gravel), but this has not been included within the draft policy wording. Therefore, we object to these site allocation policies unless appropriate wording, regarding minerals safeguarding, is inserted into the following policies:</p> <ul style="list-style-type: none"> • Land at Stalham Road, Hoveton (Policy HV06/A) • Land at End of Mundesley Road, North Walsham (Policy NW16) • Land West of Langham Road, Blakeney (Policy BLA01/B) <p>The policy wording used in the North Norfolk Local Plan for other sites within Mineral Safeguarding Areas is currently: "The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority."</p> <p>Due to the progress on the Norfolk Minerals and Waste Local Plan, which is planned for adoption in 2025 and would then replace the current Minerals and Waste Core Strategy, we advise updating the policy wording for all allocated sites in the North Norfolk Local Plan that are within a Mineral Safeguarding Areas to be worded as follows: <i>"This site is underlain by a defined Mineral Safeguarding Area for sand and gravel resource; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resource does not take place."</i></p> <p>This wording is required to be inserted into the following policies HV06/A, NW16, BLA01/B and should also be used in policies C22/4, HV01/C, ST04/A, ST19/B and MUN03/A instead of the policy wording on mineral safeguarding used in the consultation document.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: The following site allocations are within a Minerals Safeguarding Area (sand and gravel), but this has not been included within the draft policy wording. Therefore, we object to these site allocation policies unless appropriate wording, regarding minerals safeguarding, is inserted into the following policies:</p> <ul style="list-style-type: none"> • Land at End of Mundesley Road, North Walsham (Policy NW16) <p>The policy wording used in the North Norfolk Local Plan for other sites within Mineral Safeguarding Areas is currently: "The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority."</p> <p>Due to the progress on the Norfolk Minerals and Waste Local Plan, which is planned for adoption in 2025 and would then replace the current Minerals and Waste Core Strategy, we advise updating the policy wording for all allocated sites in the North Norfolk Local Plan that are within a Mineral Safeguarding Areas to be worded as follows: <i>"This site is underlain by a defined Mineral Safeguarding Area for sand and gravel resource; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resource does not take place."</i></p>

Officer Response	Comments noted. Agree to consider modification and amend as necessary. See modification schedule..
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC542
Response Date	18/12/2024 15:03:00
Full Name	Sarah Luff
Organisation	Norfolk County Council (Lead Local Flood Authority)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>The LLFA note that the sites that have been put forward as part of this review (referred to as Group A sites) are those sites which have been previously assessed through the Local Plan's Site Assessment Process and considered suitable for development but were not identified for allocation for reasons such as there being more sites than needed at the time for that specific settlement or, a different site in the same location provided better opportunities for community benefit.</p> <p>Please note that of the potential sites put forward as part of this consultation, a GIS shapefile has not been provided to the LLFA for one site (F05, Land between Holt and Greenway Lane, Fakenham) and as such this site has not been reviewed as part of this consultation. It is however noted that NNDC have since deemed this site unsuitable for inclusion.</p> <p>A comprehensive review of the remaining sites has been produced is attached, document title Appendix 2 FW2024_0840 – LLFA Response – Sites Review (Excel).</p> <p>Please note the LLFA's response is specific to surface water flood risk. No other sources of flood risk (including but not limited to fluvial and coastal flooding; flooding from artificial sources; groundwater flooding and sewer flooding) have been reviewed as part of this consultation.</p> <p>The following criteria have been used in our review, see appendix 2:</p> <p>Surface Water Flood Risk</p> <ul style="list-style-type: none"> • These have been reviewed for the 3.33%, 1.0% and 0.1% Annual Exceedance Probability (AEP) events for surface water flooding. • Where deemed necessary, site-specific comments have been provided. • Assessment of onsite flood risk is proportionate to the site size and the flood risk significance. <p>Reports of Internal and Anecdotal (inclusive of external) Flooding</p> <ul style="list-style-type: none"> • Reviewed with the LLFAs current flood records (which date back to 2011). • Onsite and flood records within 500m of the site boundary have been reported. • Please note all external flood records are deemed to be anecdotal. <p>Watercourses</p> <ul style="list-style-type: none"> • These have been reviewed and identified when onsite or within 100m proximity to the site boundary. • If a watercourse does not fall within the provided site boundaries (even if it is on the edge of the site boundary) this has been classed as offsite. • Watercourses have been defined (ordinary watercourse, main river etc) • We have not defined the ownership of the watercourses in this assessment. • We have not reviewed offline watercourses, blind ditches or pond features as part of this review. Further investigation will be needed to assess these features, their type and whether they are connected to the wider drainage network. • We have not defined whether the features are obstructed by housing or roads etc. <p>Surface and Foul Water Sewer Systems</p> <ul style="list-style-type: none"> • Reviewed against Anglian Water Services sewer mapping. • Both onsite and offsite surface water sewers with 100m of the site boundary have been reported. • We have not defined whether the features are obstructed by housing or roads etc. <p>Additional Information</p> <ul style="list-style-type: none"> • Source Protection Zones (SPZs) (If applicable) • Internal Drainage Boards (IDBs) (If applicable) <p>We have then reported:</p> <p>1. Would local flood risk/surface water drainage constraints be severe enough to prevent development of the site?</p>

	<p>2. Recommendations ranging from standard information required at planning through to requiring review and potential removal if deemed appropriate.</p> <p>Where appropriate, we have provided additional site-specific comments. For ease of use, we have produced a traffic light system based on the recommendations column:</p> <ul style="list-style-type: none"> • Red - Recommend a review of the site and potential removal from the local plan. • Orange - Significant information required at the planning stage. • Green - Standard information required at the planning stage.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	Appendix 2 FW2024_0840 – LLFA Response – Sites Review (Excel).xlsx
Officer Summary	<p>A comprehensive review of the remaining sites has been produced is attached to this representation, document title Appendix 2 FW2024_0840. LLFA's response is specific to surface water flood risk. No other sources of flood risk (including but not limited to fluvial and coastal flooding; flooding from artificial sources; groundwater flooding and sewer flooding) have been reviewed as part of this consultation.</p> <p>The following criteria have been used in our review, see appendix 2:</p> <p>Surface Water Flood Risk</p> <ul style="list-style-type: none"> • These have been reviewed for the 3.33%, 1.0% and 0.1% Annual Exceedance Probability (AEP) events for surface water flooding. • Where deemed necessary, site-specific comments have been provided. • Assessment of onsite flood risk is proportionate to the site size and the flood risk significance. <p>Reports of Internal and Anecdotal (inclusive of external) Flooding</p> <ul style="list-style-type: none"> • Reviewed with the LLFAs current flood records (which date back to 2011). • Onsite and flood records within 500m of the site boundary have been reported. • Please note all external flood records are deemed to be anecdotal. <p>Watercourses</p> <ul style="list-style-type: none"> • These have been reviewed and identified when onsite or within 100m proximity to the site boundary. • If a watercourse does not fall within the provided site boundaries (even if it is on the edge of the site boundary) this has been classed as offsite. • Watercourses have been defined (ordinary watercourse, main river etc) • We have not defined the ownership of the watercourses in this assessment. • We have not reviewed offline watercourses, blind ditches or pond features as part of this review. Further investigation will be needed to assess these features, their type and whether they are connected to the wider drainage network. • We have not defined whether the features are obstructed by housing or roads etc. <p>Surface and Foul Water Sewer Systems</p> <ul style="list-style-type: none"> • Reviewed against Anglian Water Services sewer mapping. • Both onsite and offsite surface water sewers with 100m of the site boundary have been reported. • We have not defined whether the features are obstructed by housing or roads etc. <p>Additional Information</p> <ul style="list-style-type: none"> • Source Protection Zones (SPZs) (If applicable) • Internal Drainage Boards (IDBs) (If applicable) <p>We have then reported:</p> <ol style="list-style-type: none"> 1. Would local flood risk/surface water drainage constraints be severe enough to prevent development of the site? 2. Recommendations ranging from standard information required at planning through to requiring review and potential removal if deemed appropriate. <p>Where appropriate, we have provided additional site-specific comments. For ease of use, we have produced a traffic light system based on the recommendations column:</p> <ul style="list-style-type: none"> • Red - Recommend a review of the site and potential removal from the local plan. • Orange - Significant information required at the planning stage. • Green - Standard information required at the planning stage. <p>Summary of findings within attached document, Appendix 2:</p>

	The site was rated as Amber in the RAG rating system and the standard information on surface water flooding will be required at the planning application stage, in addition to further consideration needed to assess potential impacts from surface water flowpaths on-site.
Officer Response	Comments noted. The site-specific policy includes the requirement for a Surface Water Management Plan to demonstrate that greenfield run off rates from the site are not increased. The policy also includes a requirement for a Foul Drainage Strategy that will provide details of any enhancements and set out how additional foul flows will be accommodated within the foul sewerage network, this will be delivered prior to the occupation of any dwellings. The LLFA will also be consulted on as part of any future application on site.
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC566
Response Date	18/12/2024 15:03:00
Full Name	Richard Doleman
Organisation	Principle Infrastructure Development Planner Norfolk County Council (Highways)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	There is no objection in principle to the proposed increase in numbers at North Walsham on the basis that the work already carried out for NW62 considered robust trip generation for 2,000 dwellings, however the allocation is for 1,800 dwellings. However, an additional policy point is required to be added as the second point of policy NW16 to require the submission of a transport assessment. The following should be added as the second point to policy NW16: <u>'submission of a transport assessment to be publicly consulted on, to include analysis of the impact of the development on the local transport networks, including during construction, and to identify the mitigation required, the scope of the TA to be agreed with the Local Planning Authority.'</u>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	There is no objection in principle to the proposed increase in numbers at North Walsham on the basis that the work already carried out for NW62 considered robust trip generation for 2,000 dwellings, however the allocation is for 1,800 dwellings. However, an additional policy point is required to be added as the second point of policy NW16 to require the submission of a transport assessment. The following should be added as the second point to policy NW16: <u>'submission of a transport assessment to be publicly consulted on, to include analysis of the impact of the development on the local transport networks, including during construction, and to identify the mitigation required, the scope of the TA to be agreed with the Local Planning Authority.'</u>
Officer Response	Comments noted. Agree to consider modification and amend as necessary however proposed wording may differ to align with other modifications proposed. See modification schedule.
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC572
Response Date	18/12/2024 15:03:00
Full Name	Paul Harker
Organisation	Place Planning Manager Norfolk County Council (Childrens Services)

Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>RAG Status = Amber Impact on School Estate/Transport Proximity/Capacity to develop schools:</p> <p>If this site came forward, and child yield was taken in conjunction with the 2 consented sites in North Walsham, pressure would be placed on the local schools in North Walsham, especially if the site comes forward before the planned North Walsham West SUE. The site is within 2 miles of the local schools so no transport implications arise. However, with the North Walsham SUE being planned and mitigation offered with a new Primary School site within that development along with required expansion of the High School and potential expansion of the primary phase schools, children may need to be transported to outlying schools if there are periods in development where demand for school places exceeds supply. The nearest primary phase school to North Walsham is Antingham and South Reps, 5 miles from the site. Any contributions required to mitigate this development, if the site comes forward, would be sought in response to the planning application.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>RAG Status = Amber Impact on School Estate/Transport Proximity/Capacity to develop schools:</p> <p>If this site came forward, and child yield was taken in conjunction with the 2 consented sites in North Walsham, pressure would be placed on the local schools in North Walsham, especially if the site comes forward before the planned North Walsham West SUE. The site is within 2 miles of the local schools so no transport implications arise. However, with the North Walsham SUE being planned and mitigation offered with a new Primary School site within that development along with required expansion of the High School and potential expansion of the primary phase schools, children may need to be transported to outlying schools if there are periods in development where demand for school places exceeds supply. The nearest primary phase school to North Walsham is Antingham and South Reps, 5 miles from the site. Any contributions required to mitigate this development, if the site comes forward, would be sought in response to the planning application.</p>
Officer Response	Comments noted. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.
Section	Proposed Change 3 - New Site Allocation: Land at End of Mundesley Road, North Walsham (NW16)
ID	FC584
Response Date	19/12/2024 12:03:00
Full Name	Gemma Clark
Organisation	Higher Officer, Sustainable Development, Norfolk Coast and Marine Team Natural England
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>Impacts to National landscapes Not in National Landscape</p> <p>Nutrient neutrality The site lies in a Nutrient Neutrality catchment area. As such any planning application will need to be accompanied with a Habitats Regulations Assessment (HRA) informed by a Nutrient Neutrality budget calculation and mitigation strategy.</p> <p>However foul water in this location discharges to North Walsham Wastewater Treatment Works which is pumped to Mundesley and then out to sea</p>

	<p>Water quality will need to be addressed in a HRA but can be screened out from further assessment.</p> <p>BMV Agricultural land Loss of agricultural land. Unspecified what grade. Further advice on soils is in Annex 2.</p> <p>Recreational disturbance and other issues Contributions to GIRAMS included in the policy Natural England supports the principle of provision of open space to the north along with suitable and enhanced landscaping buffer provision and enhancement of access to the Paston Way trail. However, it is not clear in draft Policy NW16 how much open space will be allocated. The proposed development of 330 dwellings and 40 specialist elderly persons accommodation is a large development that is likely to increase recreational disturbance to European sites scoped into GIRAMS and therefore a suitable allocation of green space is needed onsite in addition to the GIRAMS payment referred to in the policy.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	Natural England - Annex 2.pdf
Officer Summary	<p>Not in National Landscape. The site lies in a Nutrient Neutrality catchment area. As such any planning application will need to be accompanied with a Habitats Regulations Assessment (HRA) informed by a Nutrient Neutrality budget calculation and mitigation strategy. However foul water in this location discharges to North Walsham Wastewater Treatment Works which is pumped to Mundesley and then out to sea. Water quality will need to be addressed in a HRA but can be screened out from further assessment.</p> <p>Loss of agricultural land. Unspecified what grade. Further advice on soils is in Annex 2.</p> <p>Contributions to GIRAMS included in the policy Natural England supports the principle of provision of open space to the north along with suitable and enhanced landscaping buffer provision and enhancement of access to the Paston Way trail. However, it is not clear in draft Policy NW16 how much open space will be allocated. The proposed development of 330 dwellings and 40 specialist elderly persons accommodation is a large development that is likely to increase recreational disturbance to European sites scoped into GIRAMS and therefore a suitable allocation of green space is needed onsite in addition to the GIRAMS payment referred to in the policy.</p>
Officer Response	<p>Comments noted. Nutrient Neutrality mitigation is not required for sites in North Walsham as described in the assessment of NW16 in Appendix 1 of the Additional Sites Review Background Paper. The site-specific policy includes the requirement for a Surface Water Management Plan to demonstrate that greenfield run off rates from the site are not increased. The policy also includes a requirement for a Foul Drainage Strategy that will provide details of any enhancements and set out how additional foul flows will be accommodated within the foul sewerage network, this will be delivered prior to the occupation of any dwellings.</p> <p>The site is predominantly within Grade 3 agricultural land and also Grade 2, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. North Walsham is identified as a Large Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.</p> <p>The site-specific policy includes open space requirements along the northern boundary, in addition to provide multi-functional open space within the site, and the retention of land to the north west that should only be used access arrangements and necessary landscaping and open space as required.</p>

Proposed Change 4 - Extended Site Allocation: Land East of Tunstead Road, Hoveton (HV01/C)

Section	Proposed Change 4 - Extended Site Allocation: Land East of Tunstead Road, Hoveton (HV01/C)
ID	FC33
Response Date	17/11/2024 19:27:11
Full Name	S C
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>"Mitigation measures involve running underground pipes tot he north of the existing Brook Park and then on to the site which will take foul water from the development directly to Belaugh Water Recycling Centre, where there is capacity."</p> <p>Recent applications to build on this land have provide inadequate drainage. One developer estimate for drainage was evidently very low, which raises concerns on what solutions are being provided by developers.</p> <p>Brook Park p1 is still not adopted by Nndc for incomplete drainage reports among other issues.</p> <p>Belaugh water treatment was the worst performing in the county in 2023. Over 2000 hours of sewage into the broads.</p> <p>https://www.bbc.com/news/uk-england-norfolk-68684704</p> <p>Hoveton precinct has sewerage flowing from drains with any rain fall.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: Recent applications to build on this land have provide inadequate drainage. One developer estimate for drainage was evidently very low, which raises concerns on what solutions are being provided by developers. Belaugh water treatment was the worst performing in the county in 2023. Over 2000 hours of sewage into the broads. Hoveton precinct has sewerage flowing from drains with any rain fall.
Officer Response	Comments noted. Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by the relevant site-specific policies and Anglian Water. More detail on this proposal is set out in the representations provided by the promoter at Regulation 19, which also includes reference to improvements to the Brook Park pumping station. Furthermore, both site-specific policies include requirements for enhancements towards sewerage infrastructure which should be undertaken prior to first occupation in order to prevent detriment to the environment and comply with the Water Framework Directive obligations.
Section	Proposed Change 4 - Extended Site Allocation: Land East of Tunstead Road, Hoveton (HV01/C)
ID	FC37
Response Date	19/11/2024 10:09:11
Full Name	Mr Harry Buxton
Organisation	
Agent Full Name	
Agent Organisation	

<p>Does the Proposed Change contribute to the overall soundness of the Plan?</p>	<p>I am deeply concerned with this area of land been given over from Agrigculture to housing. It is grade 1 /grade 2 land and as such should be protected for food production and not housing. In addition the school and doctors surgery is over subscribed already and therefore further housing on this site is not beneficial without other remedial works. The sewage in this part of the village has always been probalmatic and I am aware of a new pipe line to Belaugh would have to be installed but with no actual plans and that the Belaugh pumping station is currently working at full capacity and work although sheduled by Anglian Water is noted a proviso should be added that no permissions will be allowed without adequate sewage provision.</p> <p>The area is wildlife rich with ground nesting birds as well as hares and other invertabrates which should not be ignored as more and more of nature is being harassed by building works.</p> <p>Finally the thought that the extention is in part to protect the landscape of the heritage parkland at Hoveton Hall as well as St Peters church is ridiculed by the adding of a further plot to the east and that the land to the north is shaded for possible housing. Whilst I realise that housing is required across North Norfolk with the above comments and the road network to Norwich at breaking point perhaps planners should look again?</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	<p>No</p>
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>Object: In addition the school and doctors surgery is over subscribed already and therefore further housing on this site is not beneficial without other remedial works. The sewage in this part of the village has always been probalmatic and I am aware of a new pipe line to Belaugh would have to be installed but with no actual plans and that the Belaugh pumping station is currently working at full capacity and work although sheduled by Anglian Water is noted a proviso should be added that no permissions will be allowed without adequate sewage provision.</p> <p>The area is wildlife rich with ground nesting birds as well as hares and other invertabrates which should not be ignored as more and more of nature is being harassed by building works. Finally the thought that the extention is in part to protect the landscape of the heritage parkland at Hoveton Hall as well as St Peters church is ridiculed by the adding of a further plot to the east and that the land to the north is shaded for possible housing.</p>
<p>Officer Response</p>	<p>Comments noted. Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by the relevant site-specific policies and Anglian Water. More detail on this proposal is set out in the representations provided by the promoter at Regulation 19, which also includes reference to improvements to the Brook Park pumping station. Furthermore, both site-specific policies include requirements for enhancements towards sewerage infrastructure which should be undertaken prior to first occupation in order to prevent detriment to the environment and comply with the Water Framework Directive obligations.</p> <p>Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (C4, Page 25). Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.</p> <p>Appendix 2 of the Additional Sites Review Background Paper includes a Historic Impact Assessment for both sites in Hoveton which concluded that both sites may have some impact on the setting of St. Peter's Church to the north therefore, the site-specific policies include reference for the provision of a landscape buffer to the north to soften the boundary between the development and land to the north, whilst also providing mitigation against potential impacts on St. Peter's Church.</p>
<p>Section</p>	<p>Proposed Change 4 - Extended Site Allocation: Land East of Tunstead Road, Hoveton (HV01/C)</p>
<p>ID</p>	<p>FC72</p>

Response Date	22/11/2024 20:34:24
Full Name	Mrs Eileen Green
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	We wish to show how concerned we are to hear the proposed extension of the use of more agricultural land HV01/B. Our major concerns are the lack of facilities. Doctors junior and senior school which are all full to capacity. There is also a lack of dentist facilities. The drainage sewage and surface water is already a problem with local flooding and sewage often being overflowed into the river. I see there are plans for Anglian water to lay a pipe to Belaugh pumping station but without the pumping station being extended this will only cause more issues. This development will take two large fields which normally produce vegetables. Once they are built on they will be gone forever and all the wildlife which inhabits they will have nowhere to go. All we will be left with is noise and pollution. The next issue is all the extra traffic going through the VILLAGE and over the bridge. We already have problem at the height of the tourist season. Surely there are brown field sights which could be used instead of large building developments being built on the green belt with a lesser impact to the local environment.
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: We wish to show how concerned we are to hear the proposed extension of the use of more agricultural land HV01/B. Our major concerns are the lack of facilities. Doctors junior and senior school which are all full to capacity. There is also a lack of dentist facilities.</p> <p>The drainage sewage and surface water is already a problem with local flooding and sewage often being overflowed into the river. I see there are plans for Anglian water to lay a pipe to Belaugh pumping station but without the pumping station being extended this will only cause more issues. This development will take two large fields which normally produce vegetables. Once they are built on they will be gone forever and all the wildlife which inhabits they will have nowhere to go.</p> <p>he next issue is all the extra traffic going through the VILLAGE and over the bridge. We already have problem at the height of the tourist season. Surely there are brown field sights which could be used instead of large building developments being built on the green belt with a lesser impact to the local environment.</p>
Officer Response	<p>Comments noted. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability. The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning in Health Protocol. The protocol presents a process describing how relevant NHS organisations, Norfolk & Suffolk County Councils, Public Health and the Norfolk and East Suffolk Local Planning Authorities jointly engage to ensure that health considerations are adequately accounted for in plan making and in planning applications and their subsequent developments so that the appropriate authorities can plan and priorities investment(s).</p> <p>Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by the relevant site-specific policies and Anglian Water. More detail on this proposal is set out in the representations provided by the promoter at Regulation 19, which also includes reference to improvements to the Brook Park pumping station. Furthermore, both site-specific policies include requirements for enhancements towards sewerage infrastructure which should be undertaken prior to first occupation in order to prevent detriment to the environment and comply with the Water Framework Directive obligations.</p> <p>The site-specific policy for both sites include requirements for a Transport Assessment to be undertaken for both proposed allocations in Hoveton that identifies sustainable traffic mitigation measures that will alleviate the potential cumulative impacts on the road network. The Council</p>

has a Brownfield Register, there are not enough sites on this register to accommodate the required growth needed as set out in Policy SS1 and many potential brownfield sites are unsuitable due to location or other constraints. There is no Green Belt designation in North-Norfolk.

Section	Proposed Change 4 - Extended Site Allocation: Land East of Tunstead Road, Hoveton (HV01/C)
ID	FC74
Response Date	23/11/2024 11:11:27
Full Name	Mrs J Pond
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<ol style="list-style-type: none"> 1 What research/consultation was done about the effect on traffic on the bottle neck at Wroxham River Bridge? Everyone locally suffers from huge congestion where cars can be trailed back in queues for sometimes 4 miles in the summer. The inspector will not know about this congestion, but NNDC do. There are only 2 places to cross the river bure, one in Hoveton/Wroxham and the other in Coltishall, both having horrendous issues with traffic. Another proposed (in total) 300 properties with the associated traffic of school runs, supermarket delivery vans, bin collections etc will only increase this problem. 2 Hoveton/Wroxham residents and visitors suffer from the pollution from cars/lorries etc queueing in both directions from vehicles. Bearing in mind it has proved on the news that a school child died from pollution from roads next to her school - where are the air quality tests that NNDC has completed over a year (not just in a quiet month in January) to prove this won't get worse? Especially as so many children walk to the schools locally and holiday visitors are walking around. 3 Mark Twain quoted as saying "land, they're not making it any more". In the biggest agricultural county in the UK for producing grain and high quality land - why are NNDC insisting on building on this site which is Grade 1 and 2 land - the best possible quality land there is? In the 5 grades of agricultural land (1 being top quality) - any housing should be only on poor quality grade 4/5 or brown field sites - not on prime land which threatens the UK food security. 4 There is NO public parking whatsoever in Hoveton, not one space, it is all owned by private businesses who pay rates, taxes and insurance. What provisions have NNDC to deal with the future parking associated with this development site - particularly when they are already not dealing with parking issues in the village. 5 Hoveton/Wroxham is supposed to be "The Capital of the Broads National Park" - so turning into an increasingly urban area is just crazy. With the increase in associated traffic and the pollution, lack of parking etc - this is totally an unsuitable site. 6 As with other sites up for development - the local surgery, although new, is already over subscribed, no dental provision and emergency services would face the bottle neck traffic. Both primary and secondary schools are overloaded and already cause big congestion for parking and bus traffic. Where are these kids going to go to school? 7 There are known problems already for the disposal of sewage/drainage. Belaugh the pumping station cannot cope with what it has already so to increase the amount of waste is crazy. There is no adequate infrastructure and even a new pipeline to the site will not mean it copes - it will just mean more tankers to pump out a site which is already overloaded. 8 There are considerable flooding issues in the area already. The land slopes to the south and the recent adjacent development is already causing flooding and sewage leaking to the older properties in the area. What mitigation has been considered for disposal of waters in the gutters, hard surface drainage etc? Where is it supposed to go? 9 What provision have NNDC to insist that new builds are of the highest sustainable quality? All new builds should be mandatory to have solar panels, air source heat pumps, rainwater harvesting and heat recovery insulation. Are they insisting on this? 0 NNDC seem to be anti this area. Because we are on the fringe of their district and their world centres on Cromer, it appears the housing allocation has been "dumped" here because it is far away and they don't care about the effects of an unsuitable location. Broadland district council on the other side of the boundary and the river bridge, have refused allowing any houses to be built their side because of the effects of the traffic and ensuing congestion. 1 Will the inspector look on a map at the location in relation to where local roads are crossing the river? No one will ever afford a by pass here. Coltishall also has the same issues with developments the wrong side of river crossings. Developments must only

	<p>be situated near roads that have the capacity to cope. The A1151 and A1150 have bottle necks over the Broads and rivers. That is never going away and must be taken into consideration.</p> <p>2 What provision is made for disabled properties in their allocation? It is discrimination to not have housing for disabled. For those permanently in a wheelchair, stuck in a house with no ramp, no level access and requiring a wet room for a wheelchair and rooms/doors/kitchens for wheelchairs, they need specific housing. There is not one mention of the requirements in any NNDC developments to allocate/insist on this.</p> <p>3 With a huge percentage of empty homes (over 1,000) and a well known amount of second homes (some areas in NNDC are over 50% creating over priced homes no local kids can buy), is NNDC going to make sure that these housing allocations ban second homes/holiday lets in their developments in a honeypot area</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: What research/consultation was done about the effect on traffic on the bottle neck at Wroxham River Bridge? Everyone locally suffers from huge congestion where cars can be trailed back in queues for sometimes 4 miles in the summer. The inspector will not know about this congestion, but NNDC do. There are only 2 places to cross the river here, one in Hoveton/Wroxham and the other in Coltishall, both having horrendous issues with traffic. Hoveton/Wroxham residents and visitors suffer from the pollution from cars/lorries etc queueing in both directions from vehicles.</p> <p>Why are NNDC insisting on building on this site which is Grade 1 and 2 land - the best possible quality land there is? In the 5 grades of agricultural land (1 being top quality) - any housing should be only on poor quality grade 4/5 or brown field sites - not on prime land which threatens the UK food security. There is NO public parking whatsoever in Hoveton, not one space, it is all owned by private businesses who pay rates, taxes and insurance. What provisions have NNDC to deal with the future parking associated with this development site.</p> <p>The local surgery, although new, is already over subscribed, no dental provision and emergency services would face the bottle neck traffic. Both primary and secondary schools are overloaded and already cause big congestion for parking and bus traffic.</p> <p>There are known problems already for the disposal of sewage/drainage. Belough the pumping station cannot cope with what it has already so to increase the amount of waste is crazy. There is no adequate infrastructure and even a new pipeline to the site will not mean it copes. There are considerable flooding issues in the area already. The land slopes to the south and the recent adjacent development is already causing flooding and sewage leaking to the older properties in the area.</p> <p>What provision have NNDC to insist that new builds are of the highest sustainable quality? It appears the housing allocation has been "dumped" here because it is far away and they don't care about the effects of an unsuitable location. The A1151 and A1150 have bottle necks over the Broads and rivers. That is never going away and must be taken into consideration.</p> <p>What provision is made for disabled properties in their allocation? It is discrimination to not have housing for disabled. For those permanently in a wheelchair, stuck in a house with no ramp, no level access and requiring a wet room for a wheelchair and rooms/doors/kitchens for wheelchairs, they need specific housing.</p>
Officer Response	<p>Comments noted. The site-specific policy for both sites include requirements for a Transport Assessment to be undertaken for both proposed allocations in Hoveton that identifies sustainable traffic mitigation measures that will alleviate the potential cumulative impacts on the road network. The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and no objection to development in this location was raised. Mitigation options already exist for highways issues in Colitshall as identified in Policy NW62/A and its supporting evidence, which can be found in the Local Plan's examination library.</p> <p>Both sites are within Grade 2 agricultural land, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character</p>

and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. Hoveton is identified as a Small Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 due to the provision of services and close connectivity to Wroxham's own services and facilities therefore, it is a sustainable location for development. Identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth. The Council has a Brownfield Register, there are not enough sites on this register to accommodate the required growth needed as set out in Policy SS1 and many potential brownfield sites are unsuitable due to location or other constraints.

Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability. Education capacity information is provided by the Education Authority and financial contributions will be considered through the application process in line with Developer contribution policy HC4. The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning in Health Protocol. The protocol presents a process describing how relevant NHS organisations, Norfolk & Suffolk County Councils, Public Health and the Norfolk and East Suffolk Local Planning Authorities jointly engage to ensure that health considerations are adequately accounted for in plan making and in planning applications and their subsequent developments so that the appropriate authorities can plan and priorities investment(s).

Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by the relevant site-specific policies and Anglian Water. More detail on this proposal is set out in the representations provided by the promoter at Regulation 19, which also includes reference to improvements to the Brook Park pumping station. Furthermore, both site-specific policies include requirements for enhancements towards sewerage infrastructure which should be undertaken prior to first occupation in order to prevent detriment to the environment and comply with the Water Framework Directive obligations.

Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (C4, Page 25). Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.

The site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan, including Policy ENV 8 - High Quality Design which makes references to the provision of adaptable homes.

Section	Proposed Change 4 - Extended Site Allocation: Land East of Tunstead Road, Hoveton (HV01/C)
ID	FC82
Response Date	25/11/2024 11:29:00
Full Name	Mrs Jennifer Backhurst
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	I would like to state my objections to the proposed development HV01C at present the local area is subject to flooding and escapes effluent in periods of heavy rain. No properties should be built until this problem is completely resolved. There is plenty brownfield land along the NDR corridor which could be built on and has infrastructure already in place so why does NNDC come to an agreement with Broadland District Council, Hoveton provides the schools and doctors surgery already. Prime agricultural land should not be used for housing development. We need to protect our food security. The bridge over the river is not suitable to carry the increased volume of traffic .

	<p>The proposed route through the new development linking Stalham Road to Tunstead Road provides an ideal rat run in times of heavy congestion on the Stalham Road diverting traffic past the High School, which has a problem with parking at drop off and pick up times now.</p> <p>It is dangerous now trying to turn right out of Two Saints Close because of restricted visibility and speed of cars not observing the speed limit. If the roundabout is being located at the end of Two Saints Close it will make it even more dangerous. There are bats, hares, deer and other wildlife which will be affected by the proposed development. This disturbance will have a detrimental affect to the ecology of the area.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: HV01C at present the local area is subject to flooding and escapes effluent in periods of heavy rain. No properties should be built until this problem is completely resolved. There is plenty brownfield land along the NDR corridor which could be built on and has infrastructure already in place so why does NNDC come to an agreement with Broadland District Council, Hoveton provides the schools and doctors surgery already. Prime agricultural land should not be used for housing development. We need to protect our food security.</p> <p>The proposed route through the new development linking Stalham Road to Tunstead Road provides an ideal rat run in times of heavy congestion on the Stalham Road diverting traffic past the High School, which has a problem with parking at drop off and pick up times now. It is dangerous now trying to turn right out of Two Saints Close because of restricted visibility and speed of cars not observing the speed limit. If the roundabout is being located at the end of Two Saints Close it will make it even more dangerous. There are bats, hares, deer and other wildlife which will be affected by the proposed development. This disturbance will have a detrimental affect to the ecology of the area.</p>
Officer Response	<p>Comments noted. Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by the relevant site-specific policies and Anglian Water. More detail on this proposal is set out in the representations provided by the promoter at Regulation 19, which also includes reference to improvements to the Brook Park pumping station. Furthermore, both site-specific policies include requirements for enhancements towards sewerage infrastructure which should be undertaken prior to first occupation in order to prevent detriment to the environment and comply with the Water Framework Directive obligations.</p> <p>Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability. Both sites are within Grade 2 agricultural land, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. Hoveton is identified as a Small Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 due to the provision of services and close connectivity to Wroxham's own services and facilities therefore, it is a sustainable location for development. Identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth. The Council has a Brownfield Register, there are not enough sites on this register to accommodate the required growth needed as set out in Policy SS1 and many potential brownfield sites are unsuitable due to location or other constraints.</p> <p>The site-specific policy for both sites include requirements for a Transport Assessment to be undertaken for both proposed allocations in Hoveton that identifies sustainable traffic mitigation measures that will alleviate the potential cumulative impacts on the road network. Any potential measures for traffic calming will be identified through this assessment and implemented through the application process. Connectivity through both sites will be explored further through the application process as well and will be subjected to consultation.</p>

Section	Proposed Change 4 - Extended Site Allocation: Land East of Tunstead Road, Hoveton (HV01/C)
ID	FC96
Response Date	25/11/2024 15:11:00
Full Name	Ms Eleanor Roberts
Organisation	Senior Sustainable Development Officer Water Management Alliance
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Thank you for consulting the Water Management Alliance on the North Norfolk Proposed Submission Version (Regulation 19 Publication) Local Plan. The Parishes included in the Housing Allocation Plan have some lands located within the boundary of the Internal Drainage District (IDD) of the Broads (2006) Internal Drainage Board (IDB) and Norfolk Rivers Internal Drainage Board (IDB). The Board's Byelaws therefore apply to those lands.</p> <p>A copy of the Board's Byelaws for The Broads IDB can be accessed on our website (https://www.wlma.org.uk/uploads/BIDB_Byelaws.pdf), along with maps of the IDD (https://www.wlma.org.uk/uploads/84-BIDB_drainindex.pdf). A copy of the Board's Byelaws for Norfolk Rivers IDB can be accessed on our website (https://www.wlma.org.uk/uploads/NRIDB_Byelaws.pdf), along with maps of the IDD (https://www.wlma.org.uk/uploads/179-NRIDB_Index.pdf).</p> <p>In keeping with other WMA member Boards, the principal function of the Broads (2006) IDB and Norfolk Rivers IDB is to provide flood protection within the Board's area. Certain watercourses within the IDD have been designated as 'Adopted Watercourses' by the Board. The adoption of a watercourse is an acknowledgement by the Board that the watercourse is of arterial importance to the IDD and as such, will normally receive maintenance from the IDD.</p> <p>For clarity, Main Rivers within each IDB are regulated by the Environment Agency.</p> <p>The Board's rationale and approach towards managing flood risk and water levels within the IDD is set out in the WMA Group's Planning and Byelaw Strategy document (https://www.wlma.org.uk/uploads/WMA_Planning_and_Byelaw_Policy.pdf).</p> <p>The Board will comment on planning for all major developments (10 or more properties) within the IDD watershed that are likely to discharge surface water into a watercourse within the IDD. Under certain circumstances, some major developments outside the IDD boundary may also be regulated by the Board's byelaws. We request that the Board is consulted as any planning application comes forward relating to any of the identified allocation sites.</p> <p>In order to reduce potential conflict between the planning process and the Board's regulatory regime and consenting process please be aware of the points set out below.</p> <p>Sites within WMA Board IDD</p> <ul style="list-style-type: none"> • F10 Fakenham, Land South of Barons Close <p>This allocation site is partially within the Norfolk Rivers IDD, and I note the presence of a Board Adopted watercourse (DRN093G0101 – MN51 Fakenham) adjacent to the southern site boundary, as well as riparian watercourses to the east and west. For any future proposals at this site, please be aware of the following:</p> <ul style="list-style-type: none"> •Surface water disposal from new developments should be in line with the drainage hierarchy (as per best practice). •If surface water is proposed to be disposed of via infiltration, we would recommend that the proposed strategy is supported by ground investigation to determine the infiltration potential of the site and the depth to groundwater. If on-site material were to be considered favourable then we would advise infiltration testing in line with BREDigest 365 (or equivalent) to be undertaken to determine its efficiency. •If a surface water discharge is proposed to a watercourse, the proposed development will require land drainage consent in line with the Board's byelaws (specifically byelaw3). Any consent granted will likely be conditional, pending the payment of a Surface Water Development Contribution fee, calculated in line with the Board's charging policy(https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf). •The discharge of treated foul water to a watercourse within the IDD requires land drainage consent in line with the Board's byelaws (specifically byelaw 3). •Any works within 9 metres of a Board adopted watercourse will require consent to relax Byelaw 10 (no obstructions within 9 metres of the edge of drainage or flood risk management infrastructure). •If development proposals involve works to alter a Board Adopted watercourse, consent is required under Section 23 of the Land Drainage Act 1991 (and byelaw 4).

•Should any development proposals include works to alter a riparian watercourse(including culverting for access), consent will be required under Section 23 of the Land Drainage Act 1991 (and byelaw 4). The Board is responsible for consenting this activity within the IDD, while Norfolk County Council (the Lead Local Flood Authority) is the regulatory body outside the boundary of the IDD.

Sites outside WMA Board IDD with potential to negatively impact the IDD

- C22/2, Cromer, Land West of Pine Tree Farm
- F01/B, Fakenham, Land North of Rudham Stile Lane
- F02, Fakenham, Land Adjacent Petrol Filling Station
- F03, Fakenham, Land at Junction of A148 & B1146
- LUD01/A, Ludham, Land South of School Road
- NW01/B, North Walsham, Land at Norwich Road & Nursery Drive
- NW62/A, North Walsham, Land West of North Walsham
- E7, Tattersett, Tattersett Business Park

The above sites lie outside the Norfolk Rivers IDB's IDD, however have the potential to significantly impact the Board's district should a surface water discharge be proposed. We recommend that as each of these sites prepares to apply for planning permission, they ensure their drainage proposals are designed in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4 and with the input of the IDB. It is possible that consent will be required from the Board for surface water discharge from these sites. It is likely that significant improvement works will be required in the receiving catchments of these developments in order to accept resultant additional flows downstream, for the purpose of reducing flood risk upstream and we would welcome discussion as early as possible to come to any necessary agreements to reduce flood risk in both the Board's IDD downstream and new development upstream.

At this stage our advice for surface water drainage design is as follows:

- Surface water disposal from new developments should be in line with the drainage hierarchy (as per best practice).
- We recommend that a drainage strategy is supplied which has been considered in line with the Planning Practice Guidance SuDS discharge location hierarchy.
- If it is proposed that a site disposes of surface water via infiltration, we recommend that the viability of this proposal is evidenced by ground investigation followed by infiltration testing in line with BRE Digest 365.
- If a surface water discharge is proposed to a watercourse within the watershed catchment of the Board's IDD then we request that this be in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible.
- Should any development proposals include works to alter a riparian watercourse (including culverting for access), consent will be required under Section 23 of the Land Drainage Act 1991. The Board is responsible for consenting this activity within the IDD, while Norfolk County Council (the Lead Local Flood Authority) is the regulatory body outside the boundary of the IDD.

Sites outside WMA Board IDD less likely to negatively impact the IDD

- BLA04/A, Blakeney, Land East of Langham Road
- BRI01, Briston, Land East of Astley Primary School
- BRI02, Briston, Land West of Astley Primary School
- C07/2, Cromer, Land at Cromer High Station
- C16, Cromer, Former Golf Practice Ground, Overstrand Road
- H17, Holt, Land North of Valley Lane
- H20, Holt, Land at Heath Farm
- H27/1, Holt, Land at Heath Farm
- HV01/B*, Hoveton, Land East of Tunstead Road
- LUD06/A, Ludham, Land at Eastern End of Grange Road
- NW52, North Walsham, Land East of Bradfield Road
- MUN03/B, Mundesley, Land off Cromer Road & Church Lane
- SH04, Sheringham, Land Adjoining Seaview Crescent
- SH07, Sheringham, Former Allotments, Weybourne Road, Adjacent to 'The Reef'
- SH18/1B, Sheringham, Land South of Butts Lane
- ST19/A*, Stalham, Land Adjacent Ingham Road
- ST23/2*, Stalham, Land North of Yarmouth Road, East of Broadbeach Gardens
- W01/1, Wells-next-the-Sea, Land South of Ashburton Close
- W07/1, Wells-next-the-Sea, Land Adjacent Holkham Road

*We would expect to see successful infiltration in this location as per other recent local developments.

	<p>For the above sites, we have no initial concerns, however as stated above we would request that the WMA is consulted on any forthcoming planning applications at these sites. Our standing advice at this stage is as follows:</p> <ul style="list-style-type: none"> • Surface water disposal from new developments should be in line with the drainage hierarchy (as per best practice). • We recommend that a drainage strategy is supplied which has been considered in line with the Planning Practice Guidance SuDS discharge location hierarchy. • If it is proposed that a site disposes of surface water via infiltration, we recommend that the viability of this proposal is evidenced by ground investigation followed by infiltration testing in line with BRE Digest 365. • If a surface water discharge is proposed to a watercourse within the watershed catchment of the Board's IDD then we request that this be in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible. • Should any development proposals include works to alter a riparian watercourse (including culverting for access), consent will be required under Section 23 of the Land Drainage Act 1991. The Board is responsible for consenting this activity within the IDD, while Norfolk County Council (the Lead Local Flood Authority) is the regulatory body outside the boundary of the IDD. <p>Whilst the consenting process as set out under the Land Drainage Act 1991 and the aforementioned Byelaws are separate from planning, the ability to implement a planning permission may be dependent on the granting of these consents. As such we strongly recommend that developers seek the necessary consent prior to determination of a planning application. The Board's officers are available to respond to queries and provide advice.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>Sites outside WMA Board IDD less likely to negatively impact the IDD</p> <ul style="list-style-type: none"> • HV01/B*, Hoveton, Land East of Tunstead Road <p>We would expect to see successful infiltration in this location as per other recent local developments.</p> <p>For the above sites, we have no initial concerns, however as stated above we would request that the WMA is consulted on any forthcoming planning applications at these sites. Our standing advice at this stage is as follows:</p> <ul style="list-style-type: none"> • Surface water disposal from new developments should be in line with the drainage hierarchy (as per best practice). • We recommend that a drainage strategy is supplied which has been considered in line with the Planning Practice Guidance SuDS discharge location hierarchy. • If it is proposed that a site disposes of surface water via infiltration, we recommend that the viability of this proposal is evidenced by ground investigation followed by infiltration testing in line with BRE Digest 365. • If a surface water discharge is proposed to a watercourse within the watershed catchment of the Board's IDD then we request that this be in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible. • Should any development proposals include works to alter a riparian watercourse (including culverting for access), consent will be required under Section 23 of the Land Drainage Act 1991. The Board is responsible for consenting this activity within the IDD, while Norfolk County Council (the Lead Local Flood Authority) is the regulatory body outside the boundary of the IDD.
<p>Officer Response</p>	<p>Note: This response is an identical repeat of the WMA Reg 19 response with the exception that site HV01/C is included in the table as a 'Sites outside WMA Board IDD less likely to negatively impact the IDD'. Comments noted. Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by Anglian Water and set out in the representations provided by the promoter at Regulation 19, this also includes</p>

	improvements to the Brook Park pumping station, also set out in the Regulation 19 representation. No change to policy required.
Section	Proposed Change 4 - Extended Site Allocation: Land East of Tunstead Road, Hoveton (HV01/C)
ID	FC104
Response Date	29/11/2024 10:50:45
Full Name	Mr Dennis Willis
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILE No - change to plan is unsound. An unacceptable change in view of rainfall and flooding in the area for past 40 years.
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	I have no confidence in NNDC Planners/Policy nor that of previous builders/planning applications.
File (where submitted)	For the attention of the Examiner and those of the Councils regarding the further revised NORTH NORFOLK LOCAL PLAN(2).docx
Officer Summary	<p>Object: I have no confidence in NNDC planning dept nor that of builders in carrying out what is put to public consultation. The report raises concerns regarding the poor design of Brook Park and its impact on surface water flooding and the cumulative impact on more development will exacerbate this issue.</p> <p>Report is a detailed description of surface water flood risk concerns around the area of Hoveton where both proposed allocations are situated. This is in addition to concerns raised regarding drainage and the cumulative impact on sewerage infrastructure.</p> <p>There are a number of properties in Grange Close that suffer with surface water flooding, including raw sewage contamination, and sub surface drainage that has been affecting the area since the properties were built and the issues to date have not been resolved. The development of Brook Park 1 (HV03) is considered to have exacerbated these flooding issues. It is challenging to verify this last statement, but aside from recent acclaimed 'climate change' effects, the basic application of hydrodynamics and the geology of the area should be of priority consideration. It is a fact that rainfall and associated significant flooding has become more intense in the UK because of climate change or whatever you believe in. Don't build on land that will be affected by flooding and which will exacerbate drainage issues that already exist.</p>
Officer Response	<p>Comments noted. Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belough Water Recycling Centre as required by the relevant site-specific policies and Anglian Water. More detail on this proposal is set out in the representations provided by the promoter at Regulation 19, which also includes reference to improvements to the Brook Park pumping station. Furthermore, both site-specific policies include requirements for enhancements towards sewerage infrastructure which should be undertaken prior to first occupation in order to prevent detriment to the environment and comply with the Water Framework Directive obligations.</p> <p>Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (C4, Page 25). Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.</p>
Section	Proposed Change 4 - Extended Site Allocation: Land East of Tunstead Road, Hoveton (HV01/C)

ID	FC140
Response Date	02/12/2024 15:03:00
Full Name	Mike & Christine Crowley
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I attended the Hoveton Village Council meeting the other night to listen to the discussion on the North Norfolk Local Plan which has now been extended until 2040.</p> <p>Quite frankly I find the whole proposal for the enlargement of Brook Park quite preposterous, particularly as we are located in what is supposed to be a National Park. The size of this development would have a serious impact on village life in numerous ways.</p> <p>WROXAM BRIDGE</p> <p>The bridge between Hoveton and Wroxham is struggling to cope with the 7500 + vehicles a day as it is. An extra 150+ homes would increase traffic within the village significantly. Additionally, new homes proposed at Stalham and the major development at Rackheath would together have a huge impact upon the bridge, particularly bearing in mind that the school catchment area for the Rackheath development is Broadlands school in Hoveton! This level of traffic is simply unsustainable and will have a massively detrimental affect on all who live in the village with the extra pollution that it would bring.</p> <p>BROADLANDS SCHOOL.</p> <p>The school is already at maximum capacity and is oversubscribed. Where are all these additional children going to be educated? Probably in portakabins if the developers get their way. You must be aware it is normal practice, country-wide for developers to promise the Earth before-hand and then renege on their promises once a development is built. They will come up with all sorts of reasons why for instance “proposed additional buildings to a new school” cannot now be built due to ‘unforeseen’ costs that they have incurred once the houses have been built.</p> <p>Should this development go ahead, then it is essential that developers are contractually obliged to build any school buildings prior to the development starting.</p> <p>HOVETON & WROXAM MEDICAL CENTRE</p> <p>The above applies equally to this centre. It is hard enough to get a doctor’s appointment as it is and almost impossible to park in the car park at times as it is so busy. This centre will also need to be extended in some way prior to any development taking place.</p> <p>SEWAGE AND SURFACE WATER.</p> <p>As you are aware, as things currently stand, not a single extra house can be built as the site cannot cope with any more sewage. The original Brook Park (Persimmon) site has still not been adopted by the council for a variety of reason, a major one of which is sewage. There are still houses on site that regularly have their gardens flooded during heavy rain due to poor drainage.</p> <p>There is also a slight downhill gradient between the Tunstead Road and Stalham road and part of the fields struggle to grow crops because of pooled surface water. A housing development on this land will only worsen the surface water situation if the fields are to be covered with concrete and tarmac!</p> <p>GRADE I FARMING LAND.</p> <p>You should not be permitting a housing development on what is top quality farming land. We need this land to be able to grow food for our increasing population. We need to ween ourselves of imported food and look to a more sustainable source.</p> <p>These are some of the reasons that I and my neighbours on Brook Park, as well as friends in the wider community are totally opposed to ANY further development in our lovely village of Hoveton.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	

<p>Officer Summary</p>	<p>Object: Quite frankly I find the whole proposal for the enlargement of Brook Park quite preposterous, particularly as we are located in what is supposed to be a National Park. The size of this development would have a serious impact on village life in numerous ways.</p> <p>The bridge between Hoveton and Wroxham is struggling to cope with the 7500 + vehicles a day as it is. An extra 150+ homes would increase traffic within the village significantly. Additionally, new homes proposed at Stalham and the major development at Rackheath would together have a huge impact upon the bridge, particularly bearing in mind that the school catchment area for the Rackheath development is Broadlands school in Hoveton! This level of traffic is simply unsustainable and will have a massively detrimental affect on all who live in the village with the extra pollution that it would bring.</p> <p>The school is already at maximum capacity and is oversubscribed. Where are all these additional children going to be educated? Probably in portakabins. Should this development go ahead, then it is essential that developers are contractually obliged to build any school buildings prior to the development starting.</p> <p>The above applies equally to this centre. It is hard enough to get a doctor's appointment as it is and almost impossible to park in the car park at times as it is so busy. This centre will also need to be extended in some way prior to any development taking place.</p> <p>As you are aware, as things currently stand, not a single extra house can be built as the site cannot cope with any more sewage. The original Brook Park (Persimmon) site has still not been adopted by the council for a variety of reason, a major one of which is sewage. There are still houses on site that regularly have their gardens flooded during heavy rain due to poor drainage. There is also a slight downhill gradient between the Tunstead Road and Stalham road and part of the fields struggle to grow crops because of pooled surface water. A housing development on this land will only worsen the surface water situation if the fields are to be covered with concrete and tarmac!</p> <p>You should not be permitting a housing development on what is top quality farming land. We need this land to be able to grow food for our increasing population. We need to ween ourselves of imported food and look to a more sustainable source. These are some of the reasons that I and my neighbours on Brook Park, as well as friends in the wider community are totally opposed to ANY further development in our lovely village of Hoveton.</p>
<p>Officer Response</p>	<p>Comments noted. Both sites are not within the Broads Executive Area. NNDC remain the planning authority and the Local Plan includes Policy ENV1 which ensures development proposals appropriately consider their impact on the Broads. Furthermore the Council has engaged with the Broads Authority throughout the Local Plan process to ensure any potential wider affects have been considered. Both sites, whilst in Hoveton whilst adjacent to Brook Park, are not considered to be an extension to this development. There is no requirement within the site-specific policies to provide any connectivity to Brook Park except to the Stalham Road roundabout and both sites are being brought forward by an alternative promoter.</p> <p>The site-specific policy for both sites include requirements for a Transport Assessment to be undertaken for both proposed allocations in Hoveton that identifies sustainable traffic mitigation measures that will alleviate the potential cumulative impacts on the road network. The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and no objection to development in this location was raised.</p> <p>Education capacity information is provided by the Education Authority and financial contributions will be considered through the application process in line with Developer contribution policy HC4. The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning in Health Protocol. The protocol presents a process describing how relevant NHS organisations, Norfolk & Suffolk County Councils, Public Health and the Norfolk and East Suffolk Local Planning Authorities jointly engage to ensure that health considerations are adequately accounted for in plan making and in planning applications and their subsequent developments so that the appropriate authorities can plan and priorities investment(s). Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p> <p>Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by the relevant site-specific policies and Anglian Water. More detail on this proposal is set out in the representations provided by the promoter at Regulation 19, which also includes reference to improvements to the Brook Park pumping station. Furthermore, both site-specific policies include requirements for enhancements towards sewerage infrastructure which should be undertaken prior to first occupation in order to prevent detriment to the environment and comply with the Water Framework Directive obligations.</p>

Section	Proposed Change 4 - Extended Site Allocation: Land East of Tunstead Road, Hoveton (HV01/C)
ID	FC141
Response Date	03/12/2024 15:16:00
Full Name	Mr Geoff Cook
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>The updated plan has not resolved any of the issues given in my response to the previous version of the plan, it has only made things worse:</p> <ol style="list-style-type: none"> 1. The plan states that there is sufficient capacity at the Belaugh WRC but this is not true – my understanding is that there is capacity for 349 dwellings for ALL the villages feeding into it not just Hoveton. There will be nearly 4000 houses at Rackheath alone. 2. The cost for the sewerage pipe from Hoveton to Belaugh has been estimated at £2m but there is no funding plan for this. 3. Anglian water have stated that they will upgrade Belaugh for Nutrient Neutrality by April 2030, but they haven't said anything about capacity. 4. NNDC are now allocating sites that were previously rejected without being fully evaluated, because HV01 provided sufficient capacity. How can HV06 become allocated without a full evaluation of the site. 5. The BioDiversity elements of the plan are unknown for both HV01 and HV06. From an unknown position, how is it possible to know whether an extra 10% of land has been provided? 6. The set-aside land at the back of Brook Park has attracted wildlife including Birds of Prey, Bats, Deer and Hares. How will the environment be protected and food security be maintained by building new dwellings on Grade 1 agricultural land. 7. Traffic analysis by Wroxham Parish Council has shown that there is an average of 16000 vehicles per day crossing Wroxham Bridge into or out of Hoveton. The increase in housing in Hoveton, Tunstead and Stalham will significantly increase traffic congestion in the village when it is regularly backed up to Brook Park roundabout and the petrol station in Wroxham. 8. The additional housing on HV01 and at Tunstead will add to the 'rat run' traffic between Tunstead Road and Stalham Road if the link road goes ahead. Traffic calming measures on the whole route are the minimum requirement as they are now already required on Salhouse Road. 9. Brook Park is 11% of Hoveton housing. The new developments will add another 22% meaning that 33% of housing will be new significantly altering the character of the village. 10. A Neighbourhood Plan is being developed for Hoveton. This will include allocations which could deliver sufficient housing on brownfield or greyfield sites. This and the Design Codes consultation being undertaken by AECOM would help to preserve the character of the village. 11. Hoveton is a village but is being classed as a Market Town (with no market) or Small Growth Town when combined with Wroxham. However, other facilities in Wroxham e.g. Elderly Care home are not included in the Local Plan. <p>It would be more sensible to allow the Neighbourhood Plan to allocate sites to meet the Local Plan housing needs especially as the infrastructure upgrades needed will not contribute to NNDC's annual building program until at least 2030.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: The plan states that there is sufficient capacity at the Belaugh WRC but this is not true – my understanding is that there is capacity for 349 dwellings for ALL the villages feeding into it not just Hoveton. There will be nearly 4000 houses at Rackheath alone. The cost for the sewerage pipe from Hoveton to Belaugh has been estimated at £2m but there is no funding plan for this. Anglian water have stated that they will upgrade Belaugh for Nutrient Neutrality by April 2030, but they haven't said anything about capacity.</p>

NNDC are now allocating sites that were previously rejected without being fully evaluated, because HV01 provided sufficient capacity. How can HV06 become allocated without a full evaluation of the site.

The BioDiversity elements of the plan are unknown for both HV01 and HV06. From an unknown position, how is it possible to know whether an extra 10% of land has been provided? How will the environment be protected and food security be maintained by building new dwellings on Grade 1 agricultural land.

Traffic analysis by Wroxham Parish Council has shown that there is an average of 16000 vehicles per day crossing Wroxham Bridge into or out of Hoveton. The increase in housing in Hoveton, Tunstead and Stalham will significantly increase traffic congestion in the village when it is regularly backed up to Brook Park roundabout and the petrol station in Wroxham. The additional housing on HV01 and at Tunstead will add to the 'rat run' traffic between Tunstead Road and Stalham Road if the link road goes ahead. Traffic calming measures on the whole route are the minimum requirement as they are now already required on Salhouse Road.

A Neighbourhood Plan is being developed for Hoveton. This will include allocations which could deliver sufficient housing on brownfield or greyfield sites. This and the Design Codes consultation being undertaken by AECOM would help to preserve the character of the village.

Hoveton is a village but is being classed as a Market Town (with no market) or Small Growth Town when combined with Wroxham. However, other facilities in Wroxham e.g. Elderly Care home are not included in the Local Plan.

Officer Response

Comments noted. Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by the relevant site-specific policies and Anglian Water. More detail on this proposal is set out in the representations provided by the promoter at Regulation 19, which also includes reference to improvements to the Brook Park pumping station. Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (C4, Page 25). Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.

The Council have conducted a thorough review of previous Site Assessment Process as explained within the Initial Sites Review Background Paper and have identified a small number of sites that were not previously proposed for allocation as new possible allocations. Assessment of the site as expressed in the Site Assessment Booklet (D5) concludes the site is *suitable but not chosen as a proposed allocation due to a more preferable option which meets the housing requirement*. Since then, The Inspector's response to the Local Plan (July 2024 EH006(f)) stated that the submitted Plan has a shortfall of housing provision, and the Council are seeking to provide additional allocations to help mitigate this shortfall and meet the revised objectively assessed needs. The Council has now identified HV06/A as a suitable site for possible allocation in the Local Plan. A more up to date assessment of the site can be found in Appendix 1 of the Initial Sites Review Background Paper.

Both sites are within Grade 2 agricultural land, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. Hoveton is identified as a Small Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 due to the provision of services and close connectivity to Wroxham's own services and facilities therefore, it is a sustainable location for development. Identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.

The site-specific policy for both sites include requirements for a Transport Assessment to be undertaken for both proposed allocations in Hoveton that identifies sustainable traffic mitigation measures that will alleviate the potential cumulative impacts on the road network. This in addition to the site, ST19/B in Stalham which also requires a Transport Assessment to be undertaken. Any potential measures for traffic calming will be identified through this assessment and implemented through the application process. Connectivity through both sites will be explored further as part of the application process as well. The Council has engaged with the Highway Authority throughout the additional sites review process and

	<p>throughout the Local Plan process as a whole and no objection to development in this location was raised.</p> <p>The Council are supportive of the community and parish council bringing forward a Neighbourhood Plan and will ensure both parties work collaboratively to provide an effective Plan. The Council would also be in full support of the identification of additional sites within the Neighbourhood Plan however, any potential approach needs to build upon the strategic approach adopted by the Local Plan and the proposed allocations set out for Hoveton. Policy HV01/C includes a requirement for elderly care to be provided as part of the allocation's delivery in order to help provide specialist accommodation and meet the specific identified need within North Norfolk.</p>
Section	Proposed Change 4 - Extended Site Allocation: Land East of Tunstead Road, Hoveton (HV01/C)
ID	FC151
Response Date	06/12/2024 15:41:41
Full Name	Mr Russell Reeve
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>This response is informed by views expressed at a consultation event held with residents on 13th November.</p> <p>The large increase of 25% of current household numbers in total for Hoveton is unacceptable. An extension of the village onto prime agricultural land is not sensible. Once updated NNPF guidance is put in place, it is not certain that loss of such land will remain appropriate. NNDC must resist the current central government push towards achieving greater housing numbers, particularly target numbers generated using errant (2014) population migration figures.</p> <p>The GNLP (Greater Norwich Local Plan), covering Broadland, raised concerns about locating housing in neighbouring Wroxham in respect of traffic and of preserving the Broads tourism destinations. This limitation also applies equally to Hoveton. As such, NNDC have failed to take into account Wroxham Parish Council's Neighbourhood Plan in which: 'The vision is for Wroxham to remain a unique and beautiful waterside community. It will be developed in ways that are sensitive to its iconic location and the conservation area. There are no new allocations proposed and no allocations to be carried forward in this key service centre. Traffic constraints and proximity to the Broads restricts growth.'</p> <p>The NNDC LP has not properly considered the GNLP's 4000 dwelling allocation for nearby Rackheath/ Salhouse. For Hoveton, this is already having an impact on roads, and has meant our schools and our health centre in Hoveton are already operating over capacity. Certainly, further housing in Hoveton should follow delivery of necessary capacity building for our junior and secondary schools, and also of our health centre.</p> <p>There remains a disregard for the Broads Authority's Local Plan, with site allocations for Hoveton of a hotel and 13 dwellings on Station Road in Hoveton not mentioned.</p> <p>Should additional housing need to be met within Hoveton, a suggested preferred site over now further extending HV01a would instead be on the little used bus/ long stay car park to the West of the railway station, and/ or also site HV10 on the Coltishall Road. These would both be relatively well located within the village, adjacent to the station, with footpath/ cycle way access into town available from HV10. These are also almost adjacent to the Belaugh WWTP. The car park would also then provide a 'grey field' site, rather than just using prime arable land. It would also spread development more evenly around the village, with reduced use of prime agricultural land.</p> <p>Existing major shortcomings in village infrastructure cannot be adequately addressed through developer contributions.</p> <p>Roads</p> <p>NNDC has also not properly considered the inadequate highways infrastructure provided by the A1151, the sole route into the Broads, which passes through the centre of Hoveton. Necessary road improvements cannot be delivered, to adequately deal with the existing bottleneck over the narrow bridge between Hoveton and Wroxham.</p> <p>The A1151 is already at capacity, with about 4.5 million vehicle journeys per year, with both the bridge and the mini roundabouts in Hoveton causing unacceptable delays.</p> <p>The road is also subject to regular flooding with regularly collapsing sewers along part of its length, where built on marsh.</p> <p>There is no understanding or recognition of the additional traffic arising from the 300+ dwellings also being proposed for Stalham, and villages North of Hoveton, such as Tunstead.</p>

There are concerns about Air Quality, where the A1151 passes through central Hoveton. NNDC's draft Sustainability Appraisal Scoping Report stated that a Nitrogen Dioxide hotspot was identified in Hoveton due to the high levels of traffic and congestion in the village centre. There 'is potential for Nitrogen Dioxide levels to increase with an increase in population, vehicles, and traffic'.

There is also no bus service on the Tunstead Road as stated in the LP proposals from NNDC and also no mention of the obvious need for a pedestrian crossing on the Stalham Road.

Sewage
 Despite assurances for capacity at the Belaugh WWTP to be improved by 2030, given current poor performance, the ability to accept and treat the foul water is uncertain. The Waste Water Treatment Plant is currently nearing its Technical Achievable Limit. The existing plant is also unable to properly function in flood conditions. Such sewage issues should be sorted before any development is agreed, and point to a delayed timing for any Hoveton development.

Flooding
 In wet periods, the Stalham Road already suffers surface water flooding to the extent that surface water flows across the road to the lowest points nearby, causing flooding of roads and ingress into the foul water network. There are flooding and raw sewerage escape problems in Meadow Drive and Grange Close. This would be made worse by the proposed developments, especially of HV06, which is being built on a former pond opposite. In central Hoveton, homes experience raw sewage in gardens and roadways by their property, especially when it is raining.
 The extent of problems in Hoveton are so serious that NNDC should place a moratorium on development in Hoveton until suitable solutions have been put in place, and demonstrated to be effective.
 This is especially as flooding of properties is likely to be made worse by the developments proposed, particularly for proposed development alongside the West side of the Stalham Road, as the rain water flows across the road, and floods properties opposite.

Facilities in village
 Under the current S106 arrangements, Hoveton is potentially to be starved of infrastructure funds, unlike those towns and parish for which Community Infrastructure Levy (CIL) operates. The village may have difficulty in accessing funding for village improvements linked to additional housing, such as for modernisation of the village hall and improving the landscape and environment for the riverside area in the village.

Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	Proposed site allocation HV01C does not represent a sound allocation of land for housing within the draft NNDC Local Plan
File (where submitted)	
Officer Summary	<p>Object: The large increase of 25% of current household numbers in total for Hoveton is unacceptable. An extension of the village onto prime agricultural land is not sensible. NNDC must resist the current central government push towards achieving greater housing numbers, particularly target numbers generated using errant (2014) population migration figures. The GNLP (Greater Norwich Local Plan), covering Broadland, raised concerns about locating housing in neighbouring Wroxham in respect of traffic and of preserving the Broads tourism destinations.</p> <p>The NNDC LP has not properly considered the GNLP's 4000 dwelling allocation for nearby Rackheath/ Salhouse. For Hoveton, this is already having an impact on roads, and has meant our schools and our health centre in Hoveton are already operating over capacity. There remains a disregard for the Broads Authority's Local Plan, with site allocations for Hoveton of a hotel and 13 dwellings on Station Road in Hoveton not mentioned.</p> <p>NNDC has also not properly considered the inadequate highways infrastructure provided by the A1151, the sole route into the Broads, which passes through the centre of Hoveton. Necessary road improvements cannot be delivered, to adequately deal with the existing bottleneck over the narrow bridge between Hoveton and Wroxham. The road is also subject to regular flooding with regularly collapsing sewers along part of its length, where built on marsh.</p> <p>There are concerns about Air Quality, where the A1151 passes through central Hoveton. NNDC's draft Sustainability Appraisal Scoping Report stated that a Nitrogen Dioxide hotspot was identified in Hoveton due to the high levels of traffic and congestion in the village centre.</p>

Despite assurances for capacity at the Belaugh WWTP to be improved by 2030, given current poor performance, the ability to accept and treat the foul water is uncertain. The Waste Water Treatment Plant is currently nearing its Technical Achievable Limit. The existing plant is also unable to properly function in flood conditions. Such sewage issues should be sorted before any development is agreed, and point to a delayed timing for any Hoveton development. In wet periods, the Stalham Road already suffers surface water flooding to the extent that surface water flows across the road to the lowest points nearby, causing flooding of roads and ingress into the foul water network. This is especially as flooding of properties is likely to be made worse by the developments proposed, particularly for proposed development alongside the West side of the Stalham Road, as the rain water flows across the road, and floods properties opposite.

Under the current S106 arrangements, Hoveton is potentially to be starved of infrastructure funds, unlike those towns and parish for which Community Infrastructure Levy (CIL) operates. The village may have difficulty in accessing funding for village improvements linked to additional housing, such as for modernisation of the village hall and improving the landscape and environment for the riverside area in the village.

Officer Response

Comments noted. Both sites are within Grade 2 agricultural land, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan.

Hoveton is identified as a Small Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 due to the provision of services and close connectivity to Wroxham's own services and facilities therefore, it is a sustainable location for development. Identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.

The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. The Inspector's response to the Local Plan (July 2024 EH006(f)) states the submitted Plan has a shortfall of housing provision and the Council are seeking to provide additional allocations to help mitigate this shortfall and meet the revised objectively assessed needs. The Council has engaged with neighbouring authorities and the County Council throughout the Local Plan process and have undertaken the necessary measures within site policies to address any possible cumulative impacts however, the Council is expected to meet its own housing targets and has identified an appropriate approach to achieve this.

The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and no objection to development in this location was raised. The site-specific policy for both sites include requirements for a Transport Assessment to be undertaken for both proposed allocations in Hoveton that identifies sustainable traffic mitigation measures that will alleviate the potential cumulative impacts on the road network. The site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan, including Policy CC13 - Protecting Environmental Quality which makes reference to air quality and the requirement for development proposals to minimise and take every opportunity to reduce through proportionate mitigation measures, all emissions, contamination and other forms of pollution.

Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by the relevant site-specific policies and Anglian Water. More detail on this proposal is set out in the representations provided by the promoter at Regulation 19, which also includes reference to improvements to the Brook Park pumping station. Furthermore, both site-specific policies include requirements for enhancements towards sewerage infrastructure which should be undertaken prior to first occupation in order to prevent detriment to the environment and comply with the Water Framework Directive obligations.

Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (C4, Page 25). Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.

	Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.
Section	Proposed Change 4 - Extended Site Allocation: Land East of Tunstead Road, Hoveton (HV01/C)
ID	FC156
Response Date	06/12/2024 16:25:03
Full Name	Mr Ben Bethell
Organisation	Clerk and RFO Hoveton Community (Parish) Council
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILE No. The proposed change is not well considered. It is not justified.
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	As a Council with close ties to its community, we take these matters very seriously and would expect to be part of discussions at ALL stages.
File (where submitted)	NNDC LP response - Consultation December 2024 - Hoveton Community Council HV01C.pdf
Officer Summary	<p>Object: No. The proposed change is not well considered. It is not justified.</p> <p>The large increase of 25% of current household numbers in total for Hoveton is unacceptable. An extension of the village onto prime agricultural land is not sensible. NNDC must resist the current central government push towards achieving greater housing numbers, particularly target numbers generated using errant (2014) population migration figures. The GNLP (Greater Norwich Local Plan), covering Broadland, raised concerns about locating housing in neighbouring Wroxham in respect of traffic and of preserving the Broads tourism destinations.</p> <p>The NNDC LP has not properly considered the GNLP's 4000 dwelling allocation for nearby Rackheath/ Salhouse. For Hoveton, this is already having an impact on roads, and has meant our schools and our health centre in Hoveton are already operating over capacity. There remains a disregard for the Broads Authority's Local Plan, with site allocations for Hoveton of a hotel and 13 dwellings on Station Road in Hoveton not mentioned.</p> <p>NNDC has also not properly considered the inadequate highways infrastructure provided by the A1151, the sole route into the Broads, which passes through the centre of Hoveton. Necessary road improvements cannot be delivered, to adequately deal with the existing bottleneck over the narrow bridge between Hoveton and Wroxham. The road is also subject to regular flooding with regularly collapsing sewers along part of its length, where built on marsh.</p> <p>There are concerns about Air Quality, where the A1151 passes through central Hoveton. NNDC's draft Sustainability Appraisal Scoping Report stated that a Nitrogen Dioxide hotspot was identified in Hoveton due to the high levels of traffic and congestion in the village centre.</p> <p>Despite assurances for capacity at the Belaugh WWTP to be improved by 2030, given current poor performance, the ability to accept and treat the foul water is uncertain. The Waste Water Treatment Plant is currently nearing its Technical Achievable Limit. The existing plant is also unable to properly function in flood conditions. Such sewage issues should be sorted before any development is agreed, and point to a delayed timing for any Hoveton development. In wet periods, the Stalham Road already suffers surface water flooding to the extent that surface water flows across the road to the lowest points nearby, causing flooding of roads and ingress into the foul water network. This is especially as flooding of properties is likely to be made worse by the developments proposed, particularly for proposed development alongside the West side of the Stalham Road, as the rain water flows across the road, and floods properties opposite.</p> <p>Under the current S106 arrangements, Hoveton is potentially to be starved of infrastructure funds, unlike those towns and parish for which Community Infrastructure Levy (CIL) operates. The village may have difficulty in accessing funding for village improvements linked to</p>

additional housing, such as for modernisation of the village hall and improving the landscape and environment for the riverside area in the village.

Alternative site:

Should additional housing need to be met within Hoveton, a suggested preferred site over now further extending HV01a would instead be on the little used bus/ long stay car park to the West of the railway station, and/ or also site HV10 on the Coltishall Road. These would both be relatively well located within the village, adjacent to the station, with footpath/ cycle way access into town available from HV10. These are also almost adjacent to the Belaugh WWTP. The car park would also then provide a 'grey field' site, rather than just using prime arable land. It would also spread development more evenly around the village, with reduced use of prime agricultural land

Officer Response

Comments noted. Both sites are within Grade 2 agricultural land, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. Hoveton is identified as a Small Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 due to the provision of services and close connectivity to Wroxham's own services and facilities therefore, it is a sustainable location for development. Identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.

The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. The Inspector's response to the Local Plan (July 2024 EH006(f)) states the submitted Plan has a shortfall of housing provision and the Council are seeking to provide additional allocations to help mitigate this shortfall and meet the revised objectively assessed needs. The Council has engaged with neighbouring authorities and the County Council throughout the Local Plan process and have undertaken the necessary measures within site policies to address any possible cumulative impacts however, the Council is expected to meet its own housing targets and has identified an appropriate approach to achieve this.

The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and no objection to development in this location was raised. The site-specific policy for both sites include requirements for a Transport Assessment to be undertaken for both proposed allocations in Hoveton that identifies sustainable traffic mitigation measures that will alleviate the potential cumulative impacts on the road network. The site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan, including Policy CC13 - Protecting Environmental Quality which makes reference to air quality and the requirement for development proposals to minimise and take every opportunity to reduce through proportionate mitigation measures, all emissions, contamination and other forms of pollution.

Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by the relevant site-specific policies and Anglian Water. More detail on this proposal is set out in the representations provided by the promoter at Regulation 19, which also includes reference to improvements to the Brook Park pumping station. Furthermore, both site-specific policies include requirements for enhancements towards sewerage infrastructure which should be undertaken prior to first occupation in order to prevent detriment to the environment and comply with the Water Framework Directive obligations.

Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (C4, Page 25). Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.

Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.

Proposed alternative site is noted. HV10 was assessed and included within the Site Assessment Background Paper for Hoveton (D5) however, the site was not considered further due to its poor location and connectivity to the main core of the settlement due to its location on

	<p>the western side of the railway line and being separated from residential core of the settlement by employment land. Additionally the assessment concluded that the access onto Belaugh Road was unsuitable. The Council have conducted a thorough review of previous Site Assessment Process as explained within the Initial Sites Review Background Paper and have identified a small number of sites that were not previously proposed for allocation as new possible allocations, these are considered to be the most appropriate options identified.</p>
Section	Proposed Change 4 - Extended Site Allocation: Land East of Tunstead Road, Hoveton (HV01/C)
ID	FC171
Response Date	08/12/2024 18:40:21
Full Name	Mrs Hilary Reeve
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>HV01C is not an appropriate site for inclusion in the NNDC Local Plan.</p> <p>An extension of the village onto prime agricultural land is not sensible. NNDC must resist the current central government push towards achieving greater housing numbers, particularly target numbers generated using errant (2014) population migration figures.</p> <p>The GNLP (Greater Norwich Local Plan), covering Broadland, raised concerns about locating housing in neighbouring Wroxham in respect of traffic and of preserving the Broads tourism destinations. This limitation also applies equally to Hoveton. As such, NNDC have failed to take into account Wroxham Parish Council's Neighbourhood Plan in which: 'The vision is for Wroxham to remain a unique and beautiful waterside community. It will be developed in ways that are sensitive to its iconic location and the conservation area. There are no new allocations proposed and no allocations to be carried forward in this key service centre. Traffic constraints and proximity to the Broads restricts growth.'</p> <p>The NNDC LP has not properly considered the GNLP's 4000 dwelling allocation for nearby Rackheath/ Salhouse. For Hoveton, this is already having an impact on roads, and has meant our schools and our health centre in Hoveton are already operating over capacity. Certainly, further housing in Hoveton should follow delivery of necessary capacity building for our junior and secondary schools, and also of our health centre.</p> <p>There remains a disregard for the Broads Authority's Local Plan, with site allocations for Hoveton of a hotel and 13 dwellings on Station Road in Hoveton not mentioned.</p> <p>Should additional housing need to be met within Hoveton, a suggested preferred site over now further extending HV01a would instead be on the little used bus/ long stay car park to the West of the railway station, and/ or also site HV10 on the Coltishall Road. These would both be relatively well located within the village, adjacent to the station, with footpath/ cycle way access into town available from HV10. These are also almost adjacent to the Belaugh WWTP. The car park would also then provide a 'grey field' site, rather than just using prime arable land. It would also spread development more evenly around the village, with reduced use of prime agricultural land.</p> <p>Existing major shortcomings in village infrastructure cannot be adequately addressed through developer contributions.</p> <p>Roads</p> <p>NNDC has also not properly considered the inadequate highways infrastructure provided by the A1151, the sole route into the Broads, which passes through the centre of Hoveton. Necessary road improvements cannot be delivered, to adequately deal with the existing bottleneck over the narrow bridge between Hoveton and Wroxham.</p> <p>The A1151 is already at capacity, with about 4.5 million vehicle journeys per year, with both the bridge and the mini roundabouts in Hoveton causing unacceptable delays.</p> <p>The road is also subject to regular flooding with regularly collapsing sewers along part of its length, where built on marsh.</p> <p>There is no understanding or recognition of the additional traffic arising from the 300+ dwellings also being proposed for Stalham, and villages North of Hoveton, such as Tunstead.</p> <p>There are concerns about Air Quality, where the A1151 passes through central Hoveton. NNDC's draft Sustainability Appraisal Scoping Report stated that a Nitrogen Dioxide hotspot was identified in Hoveton due to the high levels of traffic and congestion in the village centre. There 'is potential for Nitrogen Dioxide levels to increase with an increase in population, vehicles, and traffic'.</p> <p>There is also no bus service on the Tunstead Road as stated in the LP proposals from NNDC and also no mention of the obvious need for a pedestrian crossing on the Stalham Road.</p>

	<p>Sewage Despite assurances for capacity at the Belaugh WWTP to be improved by 2030, given current poor performance, the ability to accept and treat the foul water is uncertain. The Waste Water Treatment Plant is currently nearing its Technical Achievable Limit. The existing plant is also unable to properly function in flood conditions. Such sewage issues should be sorted before any development is agreed, and point to a delayed timing for any Hoveton development.</p> <p>Flooding In wet periods, the Stalham Road already suffers surface water flooding to the extent that surface water flows across the road to the lowest points nearby, causing flooding of roads and ingress into the foul water network. There are flooding and raw sewerage escape problems in Meadow Drive and Grange Close. This would be made worse by the proposed developments, especially of HV06, which is being built on a former pond opposite. In central Hoveton, homes experience raw sewage in gardens and roadways by their property, especially when it is raining. The extent of problems in Hoveton are so serious that NNDC should place a moratorium on development in Hoveton until suitable solutions have been put in place, and demonstrated to be effective. This is especially as flooding of properties is likely to be made worse by the developments proposed, particularly for proposed development alongside the West side of the Stalham Road, as the rain water flows across the road, and floods properties opposite.</p> <p>Facilities in village Under the current S106 arrangements, Hoveton is potentially to be starved of infrastructure funds, unlike those towns and parish for which Community Infrastructure Levy (CIL) operates. The village may have difficulty in accessing funding for village improvements linked to additional housing, such as for modernisation of the village hall and improving the landscape and environment for the riverside area in the village.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	<p>No</p>
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>Object: The large increase of 25% of current household numbers in total for Hoveton is unacceptable. An extension of the village onto prime agricultural land is not sensible. NNDC must resist the current central government push towards achieving greater housing numbers, particularly target numbers generated using errant (2014) population migration figures. The GNLP (Greater Norwich Local Plan), covering Broadland, raised concerns about locating housing in neighbouring Wroxham in respect of traffic and of preserving the Broads tourism destinations.</p> <p>The NNDC LP has not properly considered the GNLP's 4000 dwelling allocation for nearby Rackheath/ Salhouse. For Hoveton, this is already having an impact on roads, and has meant our schools and our health centre in Hoveton are already operating over capacity. There remains a disregard for the Broads Authority's Local Plan, with site allocations for Hoveton of a hotel and 13 dwellings on Station Road in Hoveton not mentioned.</p> <p>NNDC has also not properly considered the inadequate highways infrastructure provided by the A1151, the sole route into the Broads, which passes through the centre of Hoveton. Necessary road improvements cannot be delivered, to adequately deal with the existing bottleneck over the narrow bridge between Hoveton and Wroxham. The road is also subject to regular flooding with regularly collapsing sewers along part of its length, where built on marsh.</p> <p>There are concerns about Air Quality, where the A1151 passes through central Hoveton. NNDC's draft Sustainability Appraisal Scoping Report stated that a Nitrogen Dioxide hotspot was identified in Hoveton due to the high levels of traffic and congestion in the village centre.</p> <p>Despite assurances for capacity at the Belaugh WWTP to be improved by 2030, given current poor performance, the ability to accept and treat the foul water is uncertain. The Waste Water Treatment Plant is currently nearing its Technical Achievable Limit. The existing plant is also unable to properly function in flood conditions. Such sewage issues should be sorted before any development is agreed, and point to a delayed timing for any Hoveton development. In wet periods, the Stalham Road already suffers surface water flooding to the extent that surface water flows across the road to the lowest points nearby, causing flooding of roads and ingress into the foul water network. This is especially as flooding of properties is likely to be made worse by the developments proposed, particularly for proposed development alongside the</p>

	<p>West side of the Stalham Road, as the rain water flows across the road, and floods properties opposite.</p> <p>Under the current S106 arrangements, Hoveton is potentially to be starved of infrastructure funds, unlike those towns and parish for which Community Infrastructure Levy (CIL) operates. The village may have difficulty in accessing funding for village improvements linked to additional housing, such as for modernisation of the village hall and improving the landscape and environment for the riverside area in the village.</p>
Officer Response	<p>Comments noted. Both sites are within Grade 2 agricultural land, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. Hoveton is identified as a Small Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 due to the provision of services and close connectivity to Wroxham's own services and facilities therefore, it is a sustainable location for development. Identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.</p> <p>The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. The Inspector's response to the Local Plan (July 2024 EH006(f)) states the submitted Plan has a shortfall of housing provision and the Council are seeking to provide additional allocations to help mitigate this shortfall and meet the revised objectively assessed needs. The Council has engaged with neighbouring authorities and the County Council throughout the Local Plan process and have undertaken the necessary measures within site policies to address any possible cumulative impacts however, the Council is expected to meet its own housing targets and has identified an appropriate approach to achieve this.</p> <p>The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and no objection to development in this location was raised. The site-specific policy for both sites include requirements for a Transport Assessment to be undertaken for both proposed allocations in Hoveton that identifies sustainable traffic mitigation measures that will alleviate the potential cumulative impacts on the road network. The site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan, including Policy CC13 - Protecting Environmental Quality which makes reference to air quality and the requirement for development proposals to minimise and take every opportunity to reduce through proportionate mitigation measures, all emissions, contamination and other forms of pollution.</p> <p>Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by the relevant site-specific policies and Anglian Water. More detail on this proposal is set out in the representations provided by the promoter at Regulation 19, which also includes reference to improvements to the Brook Park pumping station. Furthermore, both site-specific policies include requirements for enhancements towards sewerage infrastructure which should be undertaken prior to first occupation in order to prevent detriment to the environment and comply with the Water Framework Directive obligations.</p> <p>Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (C4, Page 25). Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.</p> <p>Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p>
Section	Proposed Change 4 - Extended Site Allocation: Land East of Tunstead Road, Hoveton (HV01/C)
ID	FC188
Response Date	09/12/2024 12:21:11

Full Name	Mr Julian Wells
Organisation	Director FW Properties
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>The developer, FW Properties, fully supports the proposed extended site allocation on land off Tunstead Road, Hoveton under Policy Site HVOIC for the following reasons;</p> <ul style="list-style-type: none"> • The extended site (alongside Site HV06A) will facilitate the provision of significant public benefits from the development including the delivery of major off-site highway works at the junction of Stalham and Horning roads and the construction of a new Anglian Water foul water drainage pipe and pumping station from the extended site to the Belaugh Waste Water Treatment Works. • To deliver housing, for which there is an identified need, in a highly sustainable location. • To provide a higher quality layout of development (alongside Site HV06A) with an appropriate mix of house types and bungalows on larger than average sized plots within a lesser scheme density more in keeping with the rest of the village. • The scheme (alongside Site HV06A) will also be able to provide a greater than policy required open space provision with an improved landscaping buffer along the boundary to the retained arable field to the north. • To provide a larger development site for a higher quality elderly persons facility. • To deliver the policy required number of affordable housing units in the scheme. <p>We do however request, in order to make the allocation sound, that the site area is corrected to 10.76 hectares from the 10.6 hectares outlined in the draft allocation -this change will then ensure that the Policy is justified.</p> <p>FW Properties confirm that the development of the extended site meets the three tests set out in the NPPF - the site is available, suitable and deliverable for the proposed development taking into account the policy requirements of the emerging North Norfolk Local Plan. We also confirm that we can meet the site-specific requirements as set out within the draft allocation for the extended site. The developer is intending to enter into a credit purchase agreement for Nutrients Neutrality and will progress an on-site solution for BNG.</p> <p>FW Properties will shortly be submitting pre-apps to the planners, Highways and to the LLFA for the development of this extended site (including the adjoining Site HV06A). As part of the scheme evolution for the extended site, we have undertaken the initial surveys across the site which have not identified any project delivery concerns. We are in discussions with Anglian Water in relation to the foul drainage requirements and with Highways for the new access on to Tunstead Road and for the offsite highway works to the junction of Stalham and Horning Roads. As a result, we believe the scheme for the extended site is viable and fully deliverable.</p> <p>The Landowner owns the entire extended site (including Site HV06A). FW Properties have exchanged legal contracts with the Landowner to progress the planning and development of the extended site (including the adjoining Site HV06A) so all the land required is in full control of the Developer and available for development. FW Properties is an experienced developer who have a good track record of delivering high quality developments in the area and have recently completed 25 new houses in Hoveton. We are fully committed to developing this site. In addition, an experienced operator has been secured for the development of the elderly persons accommodation units on the site.</p> <p>Following the pre-apps at the beginning of 2025, FW Properties are intending to submit the detailed planning application for the whole scheme (including the adjoining Site HV06A) in Summer 2025 alongside the adoption of the emerging North Norfolk Local Plan. We will commence the development of the new homes as soon as possible following receipt of planning consent and once we have agreed the drainage works with Anglian Water and the highway works with Highways. The scheme is likely to be delivered in 3 phases with SO houses and the 60 elderly persons accommodation units being completed in 2028/29, SO houses in 2030/31, and SO houses in 2031/32.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	The Developer of the site, FW Properties, reserves the right to appear prior to the publication of the draft agendas that will set out the Inspector's matters and questions to form the basis of the discussions at the Hearings. The intention to appear is to seek to ensure that the Policy can be made sound, and in particular, deliverable over the plan period.
File (where submitted)	

Officer Summary	<p>Support:</p> <p>The developer, FW Properties, fully supports the proposed extended site allocation on land off Tunstead Road, Hoveton under Policy Site HV01C for the following reasons;</p> <ul style="list-style-type: none"> • The extended site (alongside Site HV06A) will facilitate the provision of significant public benefits from the development including the delivery of major off-site highway works at the junction of Stalham and Horning roads and the construction of a new Anglian Water foul water drainage pipe and pumping station from the extended site to the Belaugh Waste Water Treatment Works. • To deliver housing, for which there is an identified need, in a highly sustainable location. • To provide a higher quality layout of development (alongside Site HV06A) with an appropriate mix of house types and bungalows on larger than average sized plots within a lesser scheme density more in keeping with the rest of the village. • The scheme (alongside Site HV06A) will also be able to provide a greater than policy required open space provision with an improved landscaping buffer along the boundary to the retained arable field to the north. • To provide a larger development site for a higher quality elderly persons facility. • To deliver the policy required number of affordable housing units in the scheme. <p>We do however request, in order to make the allocation sound, that the site area is corrected to 10.76 hectares from the 10.6 hectares outlined in the draft allocation -this change will then ensure that the Policy is justified.</p> <p>FW Properties confirm that the development of the extended site meets the three tests set out in the NPPF - the site is available, suitable and deliverable for the proposed development taking into account the policy requirements of the emerging North Norfolk Local Plan. We also confirm that we can meet the site-specific requirements as set out within the draft allocation for the extended site. The developer is intending to enter into a credit purchase agreement for Nutrients Neutrality and will progress an on-site solution for BNG.</p> <p>FW Properties will shortly be submitting pre-apps to the planners, Highways and to the LLFA for the development of this extended site (including the adjoining Site HV06A). As part of the scheme evolution for the extended site, we have undertaken the initial surveys across the site which have not identified any project delivery concerns. We are in discussions with Anglian Water in relation to the foul drainage requirements and with Highways for the new access on to Tunstead Road and for the offsite highway works to the junction of Stalham and Horning Roads. As a result, we believe the scheme for the extended site is viable and fully deliverable.</p> <p>The Landowner owns the entire extended site (including Site HV06A). FW Properties have exchanged legal contracts with the Landowner to progress the planning and development of the extended site (including the adjoining Site HV06A) so all the land required is in full control of the Developer and available for development.</p> <p>Following the pre-apps at the beginning of 2025, FW Properties are intending to submit the detailed planning application for the whole scheme (including the adjoining Site HV06A) in Summer 2025 alongside the adoption of the emerging North Norfolk Local Plan. We will commence the development of the new homes as soon as possible following receipt of planning consent and once we have agreed the drainage works with Anglian Water and the highway works with Highways. The scheme is likely to be delivered in 3 phases with SO houses and the 60 elderly persons accommodation units being completed in 2028/29, SO houses in 2030/31, and SO houses in 2031/32.</p>
Officer Response	<p>Comments and support for the site is noted. Agree to consider modification and amend as necessary. See modification schedule. The Council will continue to engage with the site promoters to ensure the site's delivery through the Local Plan process.</p>
Section	<p>Proposed Change 4 - Extended Site Allocation: Land East of Tunstead Road, Hoveton (HV01/C)</p>
ID	<p>FC237</p>
Response Date	<p>12/12/2024 18:55:00</p>
Full Name	<p>Barbara Dent</p>
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Please pass on my objections to the proposed extra building on green fields north of the village Tunstead Road. The extra building on the first is bad enough but to build upon the second field will destroy the local character. Is there not a local brownfield site which will accommodate a little extra building? The ancient church of St Peter and beautiful wooded</p>

	<p>Hoveton Hall areas will not be enhanced by a load of characterless new buildings on their doorstep.</p> <p>I live off Tunstead Road so all this building will directly impact on us.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: Please pass on my objections to the proposed extra building on green fields north of the village Tunstead Road. The extra building on the first is bad enough but to build upon the second field will destroy the local character. Is there not a local brownfield site which will accommodate a little extra building? The ancient church of St Peter and beautiful wooded Hoveton Hall areas will not be enhanced by a load of characterless new buildings on their doorstep.</p> <p>I live off Tunstead Road so all this building will directly impact on us.</p>
Officer Response	<p>Hoveton is identified as a Small Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 due to the provision of services and close connectivity to Wroxham's own services and facilities therefore, it is a sustainable location for development. Identifying growth in this area is in line with the Local Plan's strategy. The Council has a Brownfield Register, there are not enough sites on this register to accommodate the required growth needed as set out in Policy SS1 and many potential brownfield sites are unsuitable due to location or other constraints.</p>
Section	Proposed Change 4 - Extended Site Allocation: Land East of Tunstead Road, Hoveton (HV01/C)
ID	FC242
Response Date	11/12/2024 17:13:00
Full Name	Mrs Debbie Mack
Organisation	Historic Environment Planning Adviser Historic England
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>UN SOUND</p> <p>There are no designated heritage assets on the site. The grade II* listed Church of St Peter and grade II listed ice house are located to the north east of the site but these are at sufficient distance from the site, and in the case of the ice house, in a well wooded location. The non-registered landscape surrounding the grade II listed Hoveton Hall lies to the north of the site.</p> <p>We understand that the HIA has been updated to reflect the newly enlarged site in 2024 (Additional Sites Review Background Paper p51 - 55) (https://www.north-norfolk.gov.uk/media/10669/fc002-additional-sites-review.pdf) which is welcomed.</p> <p>The extension of the site brings development closer to the heritage assets but they are still at a sufficient distance to ensure that the impacts can be mitigated.</p> <p>The HIA sets out appropriate policy wording for inclusion in the Plan (see page 55).</p> <p>However, unfortunately this wording has not been included in the Plan. The policy needs amending to incorporate the wording from the HIA.</p> <p>We appreciate that criterion 1 of the policy does include some protection for the historic environment, but this falls short of the recommendations of the HIA.</p> <p>In our SOCG (https://www.north-norfolk.gov.uk/media/9761/ex023-statement-of-common-ground-nndc-historic-england.pdf), we set out our concerns in relation to this site.</p>

Further to that, our [Matter 5 hearing statement](https://www.north-norfolk.gov.uk/media/9861/eh011-l-historic-england-response-to-miqs-matter-5.pdf) (https://www.north-norfolk.gov.uk/media/9861/eh011-l-historic-england-response-to-miqs-matter-5.pdf) set out our ongoing concerns in detail.

As set out in our hearing statement, in reviewing the HIA again, Historic England has identified a key mitigation recommendation from the HIA that is missing from the policy criteria which relates to density and height:

- Lower density, single storey dwellings on the northern part of the site

It is our view that the impacts, effects and consequent recommendations in the HIA have not been fully taken into account in the policy formulation. To that end the site-specific requirements for the development of the site would not be effective and would not be consistent with national policy to secure the conservation and enhancement of the historic environment.

We therefore recommend amending policy criterion 1 as follows:

‘1. Delivery of a carefully designed residential development that will integrate into the surrounding character, with lower density, single storey dwellings on the northern part of the site.’

We welcome criterion 4 which requires a landscaping buffer to the north of the site and referenced the Hoveton Hall Park and Garden but there is currently no mention of the listed church in the proposed policy wording.

We therefore recommend amending criterion 4 to read:

4. Provision of a landscaping buffer to the north of the site to soften the boundary between the development and the agricultural land to the north and mitigate potential impacts on heritage assets, including the Hoveton Hall Park and Garden, [St Peters Church and the Ice House](#).

As currently drafted, the allocation and policy are not consistent with national policy due to impacts on the historic environment and the policy wording is not effective in conserving and enhancing the historic environment. The allocation is therefore, in our view, unsound.

The inclusion of this change suggested above would help to ensure that site-specific requirements for development of the site are **justified** by the findings of the HIA, **consistent with national policy** and **effective** in conserving and enhancing the historic environment.

Do you consider it necessary to participate in a public hearing session, should these be required?

If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:

File (where submitted) [241218 HE response letter NNLP Further Consult.pdf](#)

Officer Summary

UNFOUND

There are no designated heritage assets on the site. The grade II* listed Church of St Peter and grade II listed ice house are located to the north east of the site but these are at sufficient distance from the site, and in the case of the ice house, in a well wooded location. The non-registered landscape surrounding the grade II listed Hoveton Hall lies to the north of the site.

We understand that the HIA has been updated to reflect the newly enlarged site in 2024 (Additional Sites Review Background Paper p51 - 55) (<https://www.north-norfolk.gov.uk/media/10669/fc002-additional-sites-review.pdf>) which is welcomed. The extension of the site brings development closer to the heritage assets but they are still at a sufficient distance to ensure that the impacts can be mitigated.

The HIA sets out appropriate policy wording for inclusion in the Plan (see page 55). However, unfortunately this wording has not been included in the Plan. The policy needs amending to incorporate the wording from the HIA.

We appreciate that criterion 1 of the policy does include some protection for the historic environment, but this falls short of the recommendations of the HIA.

In our [SOCG](https://www.north-norfolk.gov.uk/media/9761/ex023-statement-of-common-ground-rndc-historic-england.pdf) (https://www.north-norfolk.gov.uk/media/9761/ex023-statement-of-common-ground-rndc-historic-england.pdf), we set out our concerns in relation to this site.

Further to that, our [Matter 5 hearing statement](https://www.north-norfolk.gov.uk/media/9861/eh011-l-historic-england-response-to-miqs-matter-5.pdf) (https://www.north-norfolk.gov.uk/media/9861/eh011-l-historic-england-response-to-miqs-matter-5.pdf) set out our ongoing concerns in detail.

	<p>As set out in our hearing statement, in reviewing the HIA again, Historic England has identified a key mitigation recommendation from the HIA that is missing from the policy criteria which relates to density and height:</p> <ul style="list-style-type: none"> • Lower density, single storey dwellings on the northern part of the site <p>It is our view that the impacts, effects and consequent recommendations in the HIA have not been fully taken into account in the policy formulation. To that end the site-specific requirements for the development of the site would not be effective and would not be consistent with national policy to secure the conservation and enhancement of the historic environment.</p> <p>We therefore recommend amending policy criterion 1 as follows:</p> <p>‘1. Delivery of a carefully designed residential development that will integrate into the surrounding character, with lower density, single storey dwellings on the northern part of the site.’</p> <p>We welcome criterion 4 which requires a landscaping buffer to the north of the site and referenced the Hoveton Hall Park and Garden but there is currently no mention of the listed church in the proposed policy wording.</p> <p>We therefore recommend amending criterion 4 to read:</p> <p>4. Provision of a landscaping buffer to the north of the site to soften the boundary between the development and the agricultural land to the north and mitigate potential impacts on heritage assets, including the Hoveton Hall Park and Garden, <u>St Peters Church and the Ice House</u>.</p> <p>As currently drafted, the allocation and policy are not consistent with national policy due to impacts on the historic environment and the policy wording is not effective in conserving and enhancing the historic environment. The allocation is therefore, in our view, unsound.</p> <p>The inclusion of this change suggested above would help to ensure that site-specific requirements for development of the site are justified by the findings of the HIA, consistent with national policy and effective in conserving and enhancing the historic environment.</p>
Officer Response	Comments noted. Agree in part to consider modification and amend as necessary. See modification schedule. The HIA undertaken in Appendix 2 of the Initial Sites Review Background Paper appropriately identifies the concerns raised and these have been mitigated through requirements within the site-specific policy which includes the provision of a landscape buffer along the northern boundary which provides appropriate mitigation. Other matters identified in the representation have already been addressed through the previous SoCG between the Council and Historic England.
Section	Proposed Change 4 - Extended Site Allocation: Land East of Tunstead Road, Hoveton (HV01/C)
ID	FC281
Response Date	15/12/2024 12:21:00
Full Name	SJ & RK Kemp & Quinn
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am raising concerns regarding the 25% extension in household numbers</p> <p>Litter: There has been an increase in litter on the road since the Brooke park development thrown on the floor and in the hedges.</p> <p>Roads: There has been a significant increase in traffic along Tunstead Road with developments in North Walsham and Worstead over the past decade which uses Tunstead Road as a link road to the NDR. With the vulnerability of Wroxham Bridge with a further increase of traffic I can't see it being sustainable in the passage of time.</p> <p>Arable Farm land & Wildlife: There are frequent visits of wild birds, Monk Jack Deer, Bats, pheasants and I have even seen frogs habitat the land which will all be sadly lost.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	

If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>I am raising concerns regarding the 25% extension in household numbers. There has been an increase in litter on the road since the Brooke park development thrown on the floor and in the hedges. There has been a significant increase in traffic along Tunstead Road with developments in North Walsham and Worstead over the past decade which uses Tunstead Road as a link road to the NDR. With the vulnerability of Wroxham Bridge with a further increase of traffic I can't see it being sustainable in the passage of time.</p> <p>There are frequent visits of wild birds, Monk Jack Deer, Bats, pheasants and I have even seen frogs habitat the land which will all be sadly lost.</p>
Officer Response	<p>The site-specific policy for both sites include requirements for a Transport Assessment to be undertaken for both proposed allocations in Hoveton that identifies sustainable traffic mitigation measures that will alleviate the potential cumulative impacts on the road network. The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and no objection to development in this location was raised.</p> <p>The site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan, including those policies that will ensure the site protects and enhances the natural environment.</p>
Section	Proposed Change 4 - Extended Site Allocation: Land East of Tunstead Road, Hoveton (HV01/C)
ID	FC350
Response Date	19/12/2024 10:30:00
Full Name	Mr Christopher Yardley
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>The current assessment and policy for this site does not adequately address landscape impacts in relation to the wider damaging effects of the proposed development. The current proposals do not make sufficient provision for landscaping to the northern, eastern and western sides of the site to screen and integrate development into the landscape. A buffer of woodland of at least 30m (which is what is on the developments done in the 1990s to the south of the Town) is the least that can be considered appropriate. This will protect the landscape beyond the site which is part of an attractive rural location. This is a sensitive, intimate and attractive rural landscape which needs to be protected. This is not highlighted sufficiently in the policy. So many developments on the edge of settlements seem to simply abut up to the boundary with possibly a hedge between them and the open rural landscape beyond. This is out of character with the majority of older, organic development and until about 10 years ago, the better designed and landscaped new developments. Similarly large dwellings on the boundary are inappropriate. Too often large "land mark" dwellings of three stories are placed on prominent positions around such developments - these are totally alien to any previous development styles and should be formally prevented</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>The current assessment and policy for this site does not adequately address landscape impacts in relation to the wider damaging effects of the proposed development. The current proposals do not make sufficient provision for landscaping to the northern, and western sides of the site to screen and integrate development into the landscape. A buffer of woodland of at least 30m is the least that can be considered appropriate. This will protect the landscape</p>

	beyond the site which is part of an attractive rural location. This is a sensitive, intimate and attractive rural landscape which needs to be protected. This is not highlighted sufficiently in the policy.
Officer Response	Comments noted. The site-specific policy includes the provision of open space and landscape buffering to the north. The provision of a 30m buffer on the eastern boundary as well as the northern boundary would significantly impact the site's ability to deliver the required level of growth needed for the Local Plan and restrict the site's ability to create a high-quality designed development.
Section	Proposed Change 4 - Extended Site Allocation: Land East of Tunstead Road, Hoveton (HV01/C)
ID	FC431
Response Date	19/12/2024 08:27:07
Full Name	Mrs Sarah Martin
Organisation	Parish Clerk Ashmanhaugh Parish Council
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Ashmanhaugh Parish Council's response to the consultation for a revised NNDC Local Plan December 2024:</p> <p>OBJECT</p> <p>For the following reasons:</p> <p>Ashmanhaugh Parish Council's response to the consultation for the revised NNDC Local Plan (December 2024) raises several concerns about proposed housing developments in Hoveton and their potential impact on the village's infrastructure and environment. And those of the surrounding Parishes.</p> <p>Key points include:</p> <ol style="list-style-type: none"> Objections to Housing Increase: The Council opposes the proposed 25% increase in Hoveton's household numbers - prime agricultural land should not be used for development when grey-field sites are available. Infrastructure Strain: There are existing infrastructure limitations, particularly in roads, sewage systems, schools, and the health centre. Further housing should not be approved until these issues are addressed, with necessary upgrades to schools and health services. Environmental and Traffic Concerns: The Council points out that housing developments in Hoveton, which lies near the Broads National Park, would negatively affect the area's ecology and wildlife. <p>Traffic issues, including congestion and inadequate road infrastructure, are also major concerns, particularly with the A1151 road already at capacity including Wroxham bridge.</p> <p>The additional traffic and pollution caused by potential homeowners' vehicles is also something that needs to be considered, as it could be disastrous from both from a health and wildlife perspective.</p> <p>Dark skies for this and surrounding Parishes will also be affected.</p> <ol style="list-style-type: none"> Flooding and Sewage Issues: The existing flooding problems, including surface water flooding and sewage overflow, are exacerbated by the proposed developments. The Belaugh Waste Water Treatment Plant's capacity is also a concern, as it is already nearing its technical limits. <p>In summary, Ashmanhaugh Parish Council is opposed to the proposed development plans in Hoveton, with concerns about overdevelopment, infrastructure strain, environmental impact, and a lack of adequate funding for necessary infrastructure improvements.</p> <p>Whilst the Parish Council understand the Governments need for increased housing further consideration should be given to other areas where all the above issues can be addressed and resolved.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please	To ensure Ashmanhaugh Parish's comments are listened to and understood.

<p>outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>Object: Objections to Housing Increase: The Council opposes the proposed 25% increase in Hoveton's household numbers - prime agricultural land should not be used for development when grey-field sites are available.</p> <p>Infrastructure Strain: There are existing infrastructure limitations, particularly in roads, sewage systems, schools, and the health centre. Further housing should not be approved until these issues are addressed, with necessary upgrades to schools and health services.</p> <p>Environmental and Traffic Concerns: The Council points out that housing developments in Hoveton, which lies near the Broads National Park, would negatively affect the area's ecology and wildlife.</p> <p>Traffic issues, including congestion and inadequate road infrastructure, are also major concerns, particularly with the A1151 road already at capacity including Wroxham bridge. The additional traffic and pollution caused by potential homeowners' vehicles is also something that needs to be considered, as it could be disastrous from both from a health and wildlife perspective. Dark skies for this and surrounding Parishes will also be affected.</p> <p>Flooding and Sewage Issues: The existing flooding problems, including surface water flooding and sewage overflow, are exacerbated by the proposed developments. The Belaugh Waste Water Treatment Plant's capacity is also a concern, as it is already nearing its technical limits.</p>
<p>Officer Response</p>	<p>Comments noted. Both sites are within Grade 2 agricultural land, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. Hoveton is identified as a Small Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 due to the provision of services and close connectivity to Wroxham's own services and facilities therefore, it is a sustainable location for development. Identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.</p> <p>Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability. The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning in Health Protocol. The protocol presents a process describing how relevant NHS organisations, Norfolk & Suffolk County Councils, Public Health and the Norfolk and East Suffolk Local Planning Authorities jointly engage to ensure that health considerations are adequately accounted for in plan making and in planning applications and their subsequent developments so that the appropriate authorities can plan and priorities investment(s).</p> <p>The site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan including, Policy ENV1 which ensures development proposals appropriately consider their impact on the Broads and the site-specific policy includes references to providing appropriate design that will integrate into the surrounding character.</p> <p>The site-specific policy for both sites include requirements for a Transport Assessment to be undertaken for both proposed allocations in Hoveton that identifies sustainable traffic mitigation measures that will alleviate the potential cumulative impacts on the road network. The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and no objection to development in this location was raised.</p> <p>Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by the relevant site-specific policies and Anglian Water. More detail on this proposal is set out in the representations provided by the promoter at Regulation 19, which also includes reference to improvements to the Brook Park pumping station. Furthermore, both site-specific policies include requirements for enhancements towards sewerage infrastructure which should be undertaken prior to first occupation in order to prevent detriment to the environment and comply with the Water Framework Directive obligations.</p>

Section	Proposed Change 4 - Extended Site Allocation: Land East of Tunstead Road, Hoveton (HV01/C)
ID	FC453
Response Date	19/12/2024 11:29:12
Full Name	Dr Jonathan Gould
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>North Norfolk only had 1.5% population growth between 2011-2021. The population is 103,000 (Census 2021). This growth rate would project homes required for 1500 more people every ten years. Even for 20 years, this would be homes for 3,000 people, much less than the population growth of in excess of 8,000 people projected in the local plan. The local plan requirement for over 10,000 homes is a massive oversupply to what is needed.</p> <p>Hoveton is only a village of population 1,750 but it is being treated as a growth town alongside towns of populations 7,000 to 13,000. It does not have the infrastructure to support 20% population growth. Hoveton has already absorbed 16% population growth with the Brook Park development of 2014. Hoveton Village centre infrastructure already supports the Wroxham population and a large tourist industry which produces high pressure on services and infrastructure.</p> <p>There are infrastructure issues in Hoveton: Foul water drainage to Belaugh. Issues widely documented. Doctors surgery including appointments and staff Schools support the local population including the new Rackheath and Stalham developments and the new housing proposed for Tunstead in the small growth villages plan. Significantly increased surface water drainage requirements due to climate change. Hoveton and Wroxham already regularly flood in the autumn and winter. Wroxham Bridge and traffic. Wroxham already has traffic jams. There have already been new dwellings at Brook Park. The build quality issues are still being sorted out including surface water drainage issues. There have been many issues with the Victory Housing tenants. I do like the central green space at Brook Park.</p> <p>Listed Buildings and areas are affected detrimentally and significantly. St Peters Church and Hoveton Hall estate. In particular with HV01/C</p> <p>Site Modest expansion only at Hoveton. The current plans as stated above are excessive. A good builder is required. The work at Churchfields is much better than Brook Park which is poor. I like sheltered accommodation similar to in Stalham. But they are close to facilities. Bungalows are well suited to Hoveton. The Mallards development at Ash Drive, Martham is a good example. The site is a long way from village facilities for older people Tunstead Road and Two Saints Close are much lower density housing than the new proposals If the HV01/C site goes ahead in any form, a roundabout at Two Saints Drive with access to the new site would be recommended Surface water drainage must be considered. This appears to have been handled much better at Churchfields and at the Martham Mallards development than at Brook Park.</p> <p>Broads villages have particular access issues with bridges at Coltishall, Wroxham and Potter Heigham. The first two are old, small bridges which are already bottlenecks. Hoveton has a thriving tourism industry that would be damaged by congestion.</p> <p>There are many other areas in North Norfolk with better road access to develop housing in. Fixing quality issues with recent builds and suitable infrastructure should be a pre-requisite before building more. New housing needs to be the right housing, the right amount in the right place with the right infrastructure.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	

<p>Officer Summary</p>	<p>Object: North Norfolk only had 1.5% population growth between 2011-2021. The population is 103,000 (Census 2021). This growth rate would project homes required for 1500 more people every ten years. Even for 20 years, this would be homes for 3,000 people, much less than the population growth of in excess of 8,000 people projected in the local plan. The local plan requirement for over 10,000 homes is a massive oversupply to what is needed. It does not have the infrastructure to support 20% population growth. Hoveton has already absorbed 16% population growth with the Brook Park development of 2014.</p> <ul style="list-style-type: none"> • Foul water drainage to Belaugh. Issues widely documented. • Doctors surgery including appointments and staff • Schools support the local population including the new Rackheath and Stalham developments and the new housing proposed for Tunstead in the small growth villages plan. • Significantly increased surface water drainage requirements due to climate change. Hoveton and Wroxham already regularly flood in the autumn and winter. • Wroxham Bridge and traffic. Wroxham already has traffic jams. <p>Listed Buildings and areas are affected detrimentally and significantly. St Peters Church and Hoveton Hall estate. In particular with HV01/C</p> <p>Modest expansion only at Hoveton. The current plans as stated above are excessive. Surface water drainage must be considered. Broads villages have particular access issues with bridges at Coltishall, Wroxham and Potter Heigham. The first two are old, small bridges which are already bottlenecks. Hoveton has a thriving tourism industry that would be damaged by congestion.</p> <p>The site is a long way from village facilities for older people Tunstead Road and Two Saints Close are much lower density housing than the new proposals. If the HV01/C site goes ahead in any form, a roundabout at Two Saints Drive with access to the new site would be recommended. Surface water drainage must be considered.</p> <p>There are many other areas in North Norfolk with better road access to develop housing in. Fixing quality issues with recent builds and suitable infrastructure should be a pre-requisite before building more. New housing needs to be the right housing, the right amount in the right place with the right infrastructure.</p>
<p>Officer Response</p>	<p>Comments noted. The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. The Inspector's response to the Local Plan (July 2024 EH006(f)) states the submitted Plan has a shortfall of housing provision and the Council are seeking to provide additional allocations to help mitigate this shortfall and meet the revised objectively assessed needs. Hoveton is identified as a Small Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 due to the provision of services and close connectivity to Wroxham's own services and facilities therefore, it is a sustainable location for development. Identifying growth in this area is in line with the Local Plan's strategy.</p> <p>Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by the relevant site-specific policies and Anglian Water. More detail on this proposal is set out in the representations provided by the promoter at Regulation 19, which also includes reference to improvements to the Brook Park pumping station. Furthermore, both site-specific policies include requirements for enhancements towards sewerage infrastructure which should be undertaken prior to first occupation in order to prevent detriment to the environment and comply with the Water Framework Directive obligations.</p> <p>Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability. Education capacity information is provided by the Education Authority and financial contributions will be considered through the application process in line with Developer contribution policy HC4.</p> <p>Appendix 2 of the Additional Sites Review Background Paper includes a Historic Impact Assessment for both sites in Hoveton which concluded that both sites may have some impact on the setting of St. Peter's Church to the north therefore, the site-specific policies include reference for the provision of a landscape buffer to the north to soften the boundary between the development and land to the north, whilst also providing mitigation against potential impacts on St. Peter's Church.</p> <p>The site-specific policy for both sites include requirements for a Transport Assessment to be undertaken for both proposed allocations in Hoveton that identifies sustainable traffic mitigation measures that will alleviate the potential cumulative impacts on the road network. Mitigation options already exist for highways issues in Coltishall as identified in Policy NW62/A and its supporting evidence, which can be found in the Local Plan's examination library.</p>

Section	Proposed Change 4 - Extended Site Allocation: Land East of Tunstead Road, Hoveton (HV01/C)
ID	FC478
Response Date	19/12/2024 10:11:00
Full Name	Cllr Nigel Dixon
Organisation	Ward Member for Hoveton & Tunstead (NNDC)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	Hoveton - the enlarged HVO1 and new HV06 sites - they must not proceed without the foul water pipeline to Belaugh, the uprating of the Belaugh WTC, an enhanced surface water drainage system which doesn't add to the surface water drainage problems in Grange Close Hoveton, uprating the traffic capacity of Hoveton village centre/river bridge and a roundabout access on Tunstead Rd at the junction with Two Saints Close. These are essential hard infrastructure improvements that are necessary to accommodate the proposed housing growth to avoid causing serious environmental, road safety and quality of life harm.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Hoveton - the enlarged HVO1 and new HV06 sites - they must not proceed without the foul water pipeline to Belaugh, the uprating of the Belaugh WTC, an enhanced surface water drainage system which doesn't add to the surface water drainage problems in Grange Close Hoveton, uprating the traffic capacity of Hoveton village centre/river bridge and a roundabout access on Tunstead Rd at the junction with Two Saints Close. These are essential hard infrastructure improvements that are necessary to accommodate the proposed housing growth to avoid causing serious environmental, road safety and quality of life harm.
Officer Response	Comments noted. The site is expected to comply with the requirements set out in both of the site-specific policies and all other relevant policies in the Local Plan. The Council will continue to engage with the site promoters to ensure the effective delivery of both sites in Hoveton.
Section	Proposed Change 4 - Extended Site Allocation: Land East of Tunstead Road, Hoveton (HV01/C)
ID	FC501
Response Date	18/12/2024 11:27:00
Full Name	Mr Keith Johnson
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILE
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please	

<p>outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	<p>Revised NORTH NORFOLK LOCAL PLAN.docx</p>
<p>Officer Summary</p>	<p>Object: Once the Brook Park Phase 1 (HVO1/a) development had been built the flooding on the estate increased in intensity and frequency. This was also accompanied by raw sewerage contamination in various locations on the Grange Close estate which had not occurred earlier. The cause of this increase in flooding and sewerage contamination could be because when we have the heavier rainfall the surface water drainage cannot cope with the excess water and some of it ends up in the sewers, foul water system, which is also taking the additional waste created by users on Brook Park Phase 1 (HVO1/a).</p> <p>It should also be noted that using the prime agricultural land to build upon will significantly reduce the capacity of the area to absorb and retain some of the water from rainfall. . Also HVO6/a is susceptible to surface water flooding and is often waterlogged showing that its at saturation point which already contributes to surface water accumulation's in the Stalham Road and Grange Close area. Also the hard surfaces created due to the construction of new houses will contribute to surface water runoff, especially on the HVO6a site, onto the Stalham Road area which is east of this site.</p> <p>Hoveton Community Council have suggested alternative brown field sites for the building of the area's allocation of houses. These would be in a more suitable place to build and is nearer to Belaugh Sewerage treatment works! increased traffic due to holiday increases and also from the proposed developments in Tunstead, Stalham and Ludham areas of Norfolk.</p> <p>Before any development is begun on HVO1/b or HVO1/c then a direct dedicated foul water/sewerage pipeline must be installed from the sites mentioned to the waste water treatment plant at Belaugh prior to building work begins. it is hard to see how the problems of safe access and water drainage problems and surface water accumulations can be overcome along with the traffic constraints and preserving Hoveton.</p> <p>Finally all of the proposed development sites fall within the Broads National Park and within a site of Special Scientific Interest.</p>
<p>Officer Response</p>	<p>Comments noted. Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by the relevant site-specific policies and Anglian Water. More detail on this proposal is set out in the representations provided by the promoter at Regulation 19, which also includes reference to improvements to the Brook Park pumping station. Furthermore, both site-specific policies include requirements for enhancements towards sewerage infrastructure which should be undertaken prior to first occupation in order to prevent detriment to the environment and comply with the Water Framework Directive obligations.</p> <p>Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (C4, Page 25). Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.</p> <p>Both sites are within Grade 2 agricultural land, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. Hoveton is identified as a Small Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 due to the provision of services and close connectivity to Wroxham's own services and facilities therefore, it is a sustainable location for development. Identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.</p> <p>The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and no objection to development in this location was raised.</p> <p>The Council has a Brownfield Register, there are not enough sites on this register to accommodate the required growth needed as set out in Policy SS1 and many potential brownfield sites are unsuitable due to location or other constraints. There is no 'Grey' field land in North-Norfolk as this pertains to the Green Belt, which is not a present designation</p>

	within Norfolk. There are no SSSI designations within either site or within the wider area and both sites are not within the Broads National Park, this area is covered by the Broads Authority Area however, the Local Plan includes Policy ENV1 which ensures development proposals appropriately consider their impact on this Broads.
Section	Proposed Change 4 - Extended Site Allocation: Land East of Tunstead Road, Hoveton (HV01/C)
ID	FC523
Response Date	19/12/2024 11:06:00
Full Name	Tessa Saunders
Organisation	Spatial & Strategic Planning Manager Anglian Water
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILES</p> <p>Anglian Water note that this site is a proposed extension to the existing allocation. Hoveton is within Belaugh WRC catchment which currently has dry weather flow headroom to accommodate the proposed growth from site HV01/C and HV06/A. We are aware of the specific drainage requirements for this site and the need for a strategy that avoids lower-lying areas of the settlement, specifically within the Riverside Road pumping station catchment, to avoid any adverse impacts on the existing community and the environment. This is summarised in para. 2.4.5.</p> <p>It is considered that additional growth in this location presents an opportunity for the developers to coordinate their foul drainage strategies for both sites (HV01/C and HV06/A) and the delivery of the necessary infrastructure, in discussion with Anglian Water. We support the policy requirements in clauses 8 and 9 to ensure the foul drainage strategy and connection to Belaugh WRC is agreed with Anglian Water and delivered before occupancy of any dwelling on the site. We suggest that Clause 9 is amended to state:</p> <p>9. Enhancement to Delivery of sewerage infrastructure required to accommodate wastewater flows from the development should be undertaken prior to the first occupation of any dwelling to prevent detriment to the environment and comply with Water Framework Directive obligations;</p> <p>There is a water main along the western boundary of the site. Appropriate policy measures should be applied to ensure that developers undertake early engagement with Anglian Water to safeguard our assets and take account of associated easements so these assets can continue to be repaired and maintained as necessary.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	Anglian Water Response - Front Page 19.12.24.pdf Appendix 1 WRC Capacity and Dry Weather Flow.pdf
Officer Summary	<p>Anglian Water note that this site is a proposed extension to the existing allocation. Hoveton is within Belaugh WRC catchment which currently has dry weather flow headroom to accommodate the proposed growth from site HV01/C and HV06/A. We are aware of the specific drainage requirements for this site and the need for a strategy that avoids lower-lying areas of the settlement, specifically within the Riverside Road pumping station catchment, to avoid any adverse impacts on the existing community and the environment. This is summarised in para. 2.4.5.</p> <p>It is considered that additional growth in this location presents an opportunity for the developers to coordinate their foul drainage strategies for both sites (HV01/C and HV06/A) and the delivery of the necessary infrastructure, in discussion with Anglian Water. We support the policy requirements in clauses 8 and 9 to ensure the foul drainage strategy and connection to Belaugh WRC is agreed with Anglian Water and delivered before occupancy of any dwelling on the site. We suggest that Clause 9 is amended to state:</p>

	<p>9. Enhancement to Delivery of sewerage infrastructure required to accommodate wastewater flows from the development should be undertaken prior to the first occupation of any dwelling to prevent detriment to the environment and comply with Water Framework Directive obligations;</p> <p>There is a water main along the western boundary of the site. Appropriate policy measures should be applied to ensure that developers undertake early engagement with Anglian Water to safeguard our assets and take account of associated easements so these assets can continue to be repaired and maintained as necessary.</p>
Officer Response	Comments noted. Agree to consider modification and amend as necessary. See modification schedule. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.
Section	Proposed Change 4 - Extended Site Allocation: Land East of Tunstead Road, Hoveton (HV01/C)
ID	FC534
Response Date	18/12/2024 15:03:00
Full Name	Caroline Jeffrey
Organisation	Principal Planner, Minerals and Waste Policy Norfolk County Council (Minerals & Waste)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>We are pleased to note that the following new or extended site allocations recognise the site is within a mineral safeguarding area, and include mineral safeguarding requirements within the following policies:</p> <ul style="list-style-type: none"> • Land West of Pine Tree Farm, Cromer (Policy C22/4) • Land East of Tunstead Road, Hoveton (Policy HV01/C) • Land at Brumstead Road, Stalham (Policy ST04/A) • Land Adjacent Ingham Road, Stalham (Policy ST19/B) • Land off Cromer Road & Church Lane, Mundesley (Policy MUN03/A) <p>The following site allocations are within a Minerals Safeguarding Area (sand and gravel), but this has not been included within the draft policy wording. Therefore, we object to these site allocation policies unless appropriate wording, regarding minerals safeguarding, is inserted into the following policies:</p> <ul style="list-style-type: none"> • Land at Stalham Road, Hoveton (Policy HV06/A) • Land at End of Mundesley Road, North Walsham (Policy NW16) • Land West of Langham Road, Blakeney (Policy BLA01/B) <p>The policy wording used in the North Norfolk Local Plan for other sites within Mineral Safeguarding Areas is currently: "The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority."</p> <p>Due to the progress on the Norfolk Minerals and Waste Local Plan, which is planned for adoption in 2025 and would then replace the current Minerals and Waste Core Strategy, we advise updating the policy wording for all allocated sites in the North Norfolk Local Plan that are within a Mineral Safeguarding Areas to be worded as follows: <i>"This site is underlain by a defined Mineral Safeguarding Area for sand and gravel resource; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resource does not take place."</i></p> <p>This wording is required to be inserted into the following policies HV06/A, NW16, BLA01/B and should also be used in policies C22/4, HV01/C, ST04/A, ST19/B and MUN03/A instead of the policy wording on mineral safeguarding used in the consultation document.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please	

outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>We are pleased to note that the following new or extended site allocations recognise the site is within a mineral safeguarding area, and include mineral safeguarding requirements within the following policies:</p> <ul style="list-style-type: none"> • Land East of Tunstead Road, Hoveton (Policy HV01/C) <p>Due to the progress on the Norfolk Minerals and Waste Local Plan, which is planned for adoption in 2025 and would then replace the current Minerals and Waste Core Strategy, we advise updating the policy wording for all allocated sites in the North Norfolk Local Plan that are within a Mineral Safeguarding Areas to be worded as follows: <i><u>"This site is underlain by a defined Mineral Safeguarding Area for sand and gravel resource; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resource does not take place."</u></i></p> <p>This wording is required to be inserted into the following policies HV06/A, NW16, BLA01/B and should also be used in policies C22/4, HV01/C, ST04/A, ST19/B and MUN03/A instead of the policy wording on mineral safeguarding used in the consultation document.</p>
Officer Response	Comments noted. Agree to consider modification and amend as necessary. See modification schedule.
Section	Proposed Change 4 - Extended Site Allocation: Land East of Tunstead Road, Hoveton (HV01/C)
ID	FC543
Response Date	18/12/2024 15:03:00
Full Name	Sarah Luff
Organisation	Norfolk County Council (Lead Local Flood Authority)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>The LLFA note that the sites that have been put forward as part of this review (referred to as Group A sites) are those sites which have been previously assessed through the Local Plan's Site Assessment Process and considered suitable for development but were not identified for allocation for reasons such as there being more sites than needed at the time for that specific settlement or, a different site in the same location provided better opportunities for community benefit.</p> <p>Please note that of the potential sites put forward as part of this consultation, a GIS shapefile has not been provided to the LLFA for one site (F05, Land between Holt and Greenway Lane, Fakenham) and as such this site has not been reviewed as part of this consultation. It is however noted that NNDC have since deemed this site unsuitable for inclusion.</p> <p>A comprehensive review of the remaining sites has been produced is attached, document title Appendix 2 FW2024_0840 – LLFA Response – Sites Review (Excel).</p> <p>Please note the LLFA's response is specific to surface water flood risk. No other sources of flood risk (including but not limited to fluvial and coastal flooding; flooding from artificial sources; groundwater flooding and sewer flooding) have been reviewed as part of this consultation.</p> <p>The following criteria have been used in our review, see appendix 2:</p> <p>Surface Water Flood Risk</p> <ul style="list-style-type: none"> • These have been reviewed for the 3.33%, 1.0% and 0.1% Annual Exceedance Probability (AEP) events for surface water flooding. • Where deemed necessary, site-specific comments have been provided. • Assessment of onsite flood risk is proportionate to the site size and the flood risk significance. <p>Reports of Internal and Anecdotal (inclusive of external) Flooding</p> <ul style="list-style-type: none"> • Reviewed with the LLFAs current flood records (which date back to 2011). • Onsite and flood records within 500m of the site boundary have been reported. • Please note all external flood records are deemed to be anecdotal. <p>Watercourses</p>

- These have been reviewed and identified when onsite or within 100m proximity to the site boundary.
- If a watercourse does not fall within the provided site boundaries (even if it is on the edge of the site boundary) this has been classed as offsite.
- Watercourses have been defined (ordinary watercourse, main river etc)
- We have not defined the ownership of the watercourses in this assessment.
- We have not reviewed offline watercourses, blind ditches or pond features as part of this review. Further investigation will be needed to assess these features, their type and whether they are connected to the wider drainage network.
- We have not defined whether the features are obstructed by housing or roads etc.

Surface and Foul Water Sewer Systems

- Reviewed against Anglian Water Services sewer mapping.
- Both onsite and offsite surface water sewers with 100m of the site boundary have been reported.
- We have not defined whether the features are obstructed by housing or roads etc.

Additional Information

- Source Protection Zones (SPZs) (If applicable)
- Internal Drainage Boards (IDBs) (If applicable)

We have then reported:

1. Would local flood risk/surface water drainage constraints be severe enough to prevent development of the site?
2. Recommendations ranging from standard information required at planning through to requiring review and potential removal if deemed appropriate.

Where appropriate, we have provided additional site-specific comments. For ease of use, we have produced a traffic light system based on the recommendations column:

- Red - Recommend a review of the site and potential removal from the local plan.
- Orange - Significant information required at the planning stage.
- Green - Standard information required at the planning stage.

Do you consider it necessary to participate in a public hearing session, should these be required?

If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:

File (where submitted)

[Appendix 2 FW2024_0840 – LLFA Response – Sites Review \(Excel\).xlsx](#)

Officer Summary

A comprehensive review of the remaining sites has been produced is attached to this representation, document title Appendix 2 FW2024_0840. LLFA’s response is specific to surface water flood risk. No other sources of flood risk (including but not limited to fluvial and coastal flooding; flooding from artificial sources; groundwater flooding and sewer flooding) have been reviewed as part of this consultation.

The following criteria have been used in our review, see appendix 2:

Surface Water Flood Risk

- These have been reviewed for the 3.33%, 1.0% and 0.1% Annual Exceedance Probability (AEP) events for surface water flooding.
- Where deemed necessary, site-specific comments have been provided.
- Assessment of onsite flood risk is proportionate to the site size and the flood risk significance.

Reports of Internal and Anecdotal (inclusive of external) Flooding

- Reviewed with the LLFAs current flood records (which date back to 2011).
- Onsite and flood records within 500m of the site boundary have been reported.
- Please note all external flood records are deemed to be anecdotal.

Watercourses

- These have been reviewed and identified when onsite or within 100m proximity to the site boundary.
- If a watercourse does not fall within the provided site boundaries (even if it is on the edge of the site boundary) this has been classed as offsite.
- Watercourses have been defined (ordinary watercourse, main river etc)
- We have not defined the ownership of the watercourses in this assessment.
- We have not reviewed offline watercourses, blind ditches or pond features as part of this review. Further investigation will be needed to assess these features, their type and whether they are connected to the wider drainage network.
- We have not defined whether the features are obstructed by housing or roads etc.

	<p>Surface and Foul Water Sewer Systems</p> <ul style="list-style-type: none"> • Reviewed against Anglian Water Services sewer mapping. • Both onsite and offsite surface water sewers with 100m of the site boundary have been reported. • We have not defined whether the features are obstructed by housing or roads etc. <p>Additional Information</p> <ul style="list-style-type: none"> • Source Protection Zones (SPZs) (If applicable) • Internal Drainage Boards (IDBs) (If applicable) <p>We have then reported:</p> <ol style="list-style-type: none"> 1. Would local flood risk/surface water drainage constraints be severe enough to prevent development of the site? 2. Recommendations ranging from standard information required at planning through to requiring review and potential removal if deemed appropriate. <p>Where appropriate, we have provided additional site-specific comments. For ease of use, we have produced a traffic light system based on the recommendations column:</p> <ul style="list-style-type: none"> • Red - Recommend a review of the site and potential removal from the local plan. • Orange - Significant information required at the planning stage. • Green - Standard information required at the planning stage. <p>Summary of findings within attached document, Appendix 2:</p> <p>The site was rated as Green in the RAG rating system and the standard information on surface water flooding will be required at the planning application stage, in the event access from Stalham Road is proposed, in addition further consideration is needed to assess potential impacts from surface water flowpaths. if access is proposed from Tunstead Road, then no surface water drainage constraints will likely prevent development.</p>
Officer Response	Comments noted. The Council can confirm that the site's main access is from Tunstead Road, with a through connection to Stalham Road to enable connectivity between HV01/C and HV06/A. The LLFA will also be consulted on as part of any future application on site. Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by the relevant site-specific policies and Anglian Water. Furthermore, both site-specific policies include requirements for enhancements towards sewerage infrastructure which should be undertaken prior to first occupation in order to prevent detriment to the environment and comply with the Water Framework Directive obligations.
Section	Proposed Change 4 - Extended Site Allocation: Land East of Tunstead Road, Hoveton (HV01/C)
ID	FC565
Response Date	18/12/2024 15:03:00
Full Name	Richard Doleman
Organisation	Principle Infrastructure Development Planner Norfolk County Council (Highways)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	No objection to the proposed allocation policy.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	No objection to the proposed allocation policy.
Officer Response	Comment noted.

Section	Proposed Change 4 - Extended Site Allocation: Land East of Tunstead Road, Hoveton (HV01/C)
ID	FC578
Response Date	18/12/2024 15:03:00
Full Name	Paul Harker
Organisation	Place Planning Manager Norfolk County Council (Childrens Services)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	RAG Status = Green Impact on School Estate/Transport Proximity/Capacity to develop schools: Its likely this development will add additional pressure onto the existing school from its local catchment, and could place pressure on the school. Primary and secondary provision sites on constrained sites and further assessment would be required to the implications of the next nearest schools. It will depend if this site comes forward in isolation or alongside site HV06/A as to whether the level of impact will be felt.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	RAG Status = Green Impact on School Estate/Transport Proximity/Capacity to develop schools: Its likely this development will add additional pressure onto the existing school from its local catchment, and could place pressure on the school. Primary and secondary provision sites on constrained sites and further assessment would be required to the implications of the next nearest schools. It will depend if this site comes forward in isolation or alongside site HV06/A as to whether the level of impact will be felt.
Officer Response	Comments noted. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.
Section	Proposed Change 4 - Extended Site Allocation: Land East of Tunstead Road, Hoveton (HV01/C)
ID	FC585
Response Date	19/12/2024 12:03:00
Full Name	Gemma Clark
Organisation	Higher Officer, Sustainable Development, Norfolk Coast and Marine Team Natural England
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILES Impacts to National landscapes The site is close to the boundary of the Broads National Park and therefore careful consideration will be needed as to design to ensure that the special qualities of the National Park are not compromised through high quality design, careful siting taking into account views to and from the National Park, sensitive planting and consideration of lighting. Further advice on landscapes is in Annex 3 . A Landscape Strategy or Landscape Visual Impact Assessment (LVIA) will be required to help integrate development into the landscape and minimise visual impact. Nutrient neutrality

	<p>The proposed site allocation lies within the River Bure Nutrient Neutrality catchment area. As such any application will need to be accompanied with an HRA informed by a Nutrient Neutrality budget calculation and mitigation strategy.</p> <p>The Additional Sites Review Background Paper (November 2024 page 27), states that offsite mitigation will be available by the purchase of credits. Further advice on credits is in Annex 5</p> <p>BMV Agricultural land</p> <p>As the site is in grade 1 to 3 agricultural land, Natural England have reservations about the permanent or temporary loss of any associated farmland to development. It is understood that North Norfolk has a limited amount of previously developed land in the district and therefore the majority of the development will require the use of underdeveloped land (Addendum to the Sustainability Appraisal Report, Nov 2024, page 32). Further advice on soils is in Annex 2.</p> <p>Recreational disturbance and other issues</p> <p>Contributions to GIRAMS included in the policy To counteract the loss of undeveloped land the creation of habitat extension and buffering to existing designated sites is an opportunity to protect these areas and ensure that habitats and species are safeguarded from increased growth in the area.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	<p>Natural England - Annex 2.pdf Natural England - Annex 3.pdf Natural England - Annex 5.pdf</p>
Officer Summary	<p>The site is close to the boundary of the Broads National Park and therefore careful consideration will be needed as to design to ensure that the special qualities of the National Park are not compromised through high quality design, careful siting taking into account views to and from the National Park, sensitive planting and consideration of lighting. A Landscape Strategy or Landscape Visual Impact Assessment (LVIA) will be required to help integrate development into the landscape and minimise visual impact.</p> <p>The proposed site allocation lies within the River Bure Nutrient Neutrality catchment area. As such any application will need to be accompanied with an HRA informed by a Nutrient Neutrality budget calculation and mitigation strategy. The Additional Sites Review Background Paper (November 2024 page 27), states that offsite mitigation will be available by the purchase of credits. Further advice on credits is in Annex 5</p> <p>As the site is in grade 1 to 3 agricultural land, Natural England have reservations about the permanent or temporary loss of any associated farmland to development. It is understood that North Norfolk has a limited amount of previously developed land in the district and therefore the majority of the development will require the use of underdeveloped land (Addendum to the Sustainability Appraisal Report, Nov 2024, page 32). Further advice on soils is in Annex 2.</p> <p>Contributions to GIRAMS included in the policy To counteract the loss of undeveloped land the creation of habitat extension and buffering to existing designated sites is an opportunity to protect these areas and ensure that habitats and species are safeguarded from increased growth in the area.</p>
Officer Response	<p>The site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan including, Policy ENV1 which ensures development proposals appropriately consider their impact on the Broads and the site-specific policy includes references to providing appropriate design that will integrate into the surrounding character. An LVIA may be undertaken through the application process as expressed in Policy ENV2 of the Local Plan.</p> <p>The Council confirm that, through ongoing engagement with the site promoter, that mitigation will be provided for Nutrient Neutrality via the purchasing of credits. Both sites are within Grade 2 agricultural land, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. Hoveton is identified as a Small Growth</p>

Town in the Local Plan's Settlement Hierarchy and Policy SS1 due to the provision of services and close connectivity to Wroxham's own services and facilities therefore, it is a sustainable location for development. Identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.

Proposed Change 5 - New Site Allocation: Land at Stalham Road, Hoveton (HV06/A)

Section	Proposed Change 5 - New Site Allocation: Land at Stalham Road, Hoveton (HV06/A)
ID	FC34
Response Date	17/11/2024 19:26:21
Full Name	S C
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	Original plan noted air quality issues for Hoveton. With pollution exceeding limits as they were in 2019. The roads, congestion are not suitable for more housing. More traffic, more pollution and likely lower targets. The Hoveton bridge is not suitable for 400+ more cars.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: Original plan noted air quality issues for Hoveton. With pollution exceeding limits as they were in 2019. The roads, congestion are not suitable for more housing. More traffic, more pollution and likely lower targets. The Hoveton bridge is not suitable for 400+ more cars.
Officer Response	Comments noted. The site-specific policy includes a requirement for a Transport Assessment to be undertaken for both proposed allocations in Hoveton that identifies sustainable traffic mitigation measures that will alleviate the potential cumulative impacts on the road network. The Council has engaged with the Highway Authority throughout the additional sites review process and no objection was raised. The site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan, including Policy CC13 - Protecting Environmental Quality which makes reference to air quality and the requirement for development proposals to minimise and take every opportunity to reduce through proportionate mitigation measures, all emissions, contamination and other forms of pollution.
Section	Proposed Change 5 - New Site Allocation: Land at Stalham Road, Hoveton (HV06/A)
ID	FC36
Response Date	18/11/2024 16:31:23
Full Name	Mr Harry Buxton
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I would like to write to formally object to this area being built on for the following reasons:</p> <ol style="list-style-type: none"> 1) The drainage of the area is poor and it is the lowest level in the field. 2) The area is grade 2 arable land and should be preserved for farming 3) the valuable area for wildlife with existing hedges and grass margins will be disturbed and lost 4) the impact on the historic church of St Peter's and the views thereof. 5) further damage to the dark skies policy that exists for all rural planning. <p>To conclude if the plan for housing to the west of this plot goes ahead which seems likely this will only add to the problems that that area will produce in relation to loss of farm land wildlife habitat and the purpose of the west extension was to shield the impact of housing from the heritage site and St Peter's church. If further areas are required for additional homes then I would suggest planners look at alternative sites.</p>

Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>The drainage of the area is poor and it is the lowest level in the field. The area is grade 2 arable land and should be preserved for farming. The valuable area for wildlife with existing hedges and grass margins will be disturbed and lost. The impact on the historic church of St Peter's and the views thereof. Further damage to the dark skies policy that exists for all rural planning.</p> <p>If further areas are required for additional homes then I would suggest planners look at alternative sites.</p>
Officer Response	<p>Comments noted. Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belagh Water Recycling Centre as required by the relevant site-specific policies and Anglian Water. More detail on this proposal is set out in the representations provided by the promoter at Regulation 19, which also includes reference to improvements to the Brook Park pumping station. Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (C4, Page 25). Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.</p> <p>The site is within Grade 2 agricultural land, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. Hoveton is identified as a Small Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 due to its close connectivity to Wroxham, and is a sustainable location for development. Identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.</p> <p>Appendix 2 of the Additional Sites Review Background Paper includes a Historic Impact Assessment for both sites in Hoveton which concluded that both sites may have some impact on the setting of St. Peter's Church to the north therefore, the site-specific policies include reference for the provision of a landscape buffer to the north to soften the boundary between the development and land to the north, whilst also providing mitigation against potential impacts on St. Peter's Church.</p> <p>The site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan, including Policy CC13 - Protecting Environmental Quality which makes reference to the requirement for proposals to minimise the impact on tranquillity and dark skies in North Norfolk and the adjoining Authorities' areas.</p>
Section	Proposed Change 5 - New Site Allocation: Land at Stalham Road, Hoveton (HV06/A)
ID	FC67
Response Date	22/11/2024 15:44:15
Full Name	Mrs Caron Hayes
Organisation	
Agent Full Name	
Agent Organisation	

<p>Does the Proposed Change contribute to the overall soundness of the Plan?</p>	<p>The existing estate of Brook Park, between the Stalham and Tunstead Roads in Hoveton is already putting a heavy strain on the existing surface and foul water drainage systems. Anglian Water, we understand, were going to resolve the issues with the pumping station at Grange Close, Hoveton, but apparently have failed to do so, resulting in increasing issues with flooding and sewage contamination of that estate. Building any additional houses will inevitably increase the strain and the solution proposed of the contractor funding into the existing and/or additional sewage holding tank in Belaugh, provided by Anglian Water, next to the river, seems irresponsible in the current climate where sewage effluent is an increasing environmental concern generally and into the River Bure at Belaugh specifically - for which Anglian Water have already been fined in 2003.</p> <p>The surface water drainage seems especially of concern with regard to this proposal (along with the impact of HV01/C), as the ground slopes down to Stalham Road. Currently the arable land absorbs a large amount of rainwater, without causing any issues in the field along Stalham Road, the bank of trees and shrubs greatly assists with this. Building right across from Tunstead to Stalham Road (HV01/C and HV06A), without any intervening arable land, will just ensure that excessive surface water will be channelled directly across to the Grange Close Estate, adding to the existing problems. Surely smaller pockets of buildings would perhaps spread the load with regards to surface water drainage issues and perhaps foul water as well.</p> <p>The proposals also don't appear to take account of the high quality of arable land that will be lost. The fields between the Stalham and Tunstead Roads did not appear to have experienced the flooding which occurred elsewhere last Winter and this Spring. They are always fully utilised by the farmer and a far greater concern should be displayed to retaining good arable land.</p> <p>Building should be more focused along the NDR road corridor generally, far better transport links and employment opportunities are available nearer to Norwich. Maybe additional rail and/or tram links would be viable going forward and these are so much more possible in the future without having to cross the River Bure. Certainly there are no safe cycle paths or routes into Norwich from Hoveton. Few employment opportunities exist in Hoveton and those that do are to a large extent, seasonal. We don't even have a bank now....NNDC are essentially forcing the two old and inadequate bridges at Wroxham and Coltishall to cope with huge amounts of additional domestic traffic (not just from Hoveton) that would result from all these additional houses. Future domestic building should be focused on the Norwich side of these bridges to reduce transport issues going forward. Within the last year, Wroxham Bridge has had severe flooding issues and will probably continue to do so, despite Highways best efforts, all traffic is then forced to Coltishall, along a country road that is not suited to these additional vehicle pressures. Obviously NNDC has to build a certain number of houses, that is accepted, but surely some sensible approach could be established at County level, with the other District Councils for more structured future plans going forward, nearer to Norwich.</p> <p>There seems to be an attitude that by just filling in pockets of arable land around existing villages/towns, somehow the required services and amenities will be provided and that such expansion will be of great benefit culturally, just because of additional numbers. The likelihood is that there will just be less availability, causing greater stress. There should be far greater reassurance to current council tax payers that the existing services including Doctor's and Schools will be able to actually cope with all the additional pressures that all these additional homes will bring once populated.</p> <p>Environmentally the current design of estates appears to have no room for any real biodiversity. Irrespective of the size of a house, the allocated garden is so minimal that there is no room for trees or larger shrubs. These estates are bleak, do not reflect local style and architecture and apart from a bit of grassed landscaping, any real habitat must be minimal. Living alongside Stalham Road, we know that the field, trees and wide hedgerow/verge from our property to the roundabout and behind us, provide a wildlife corridor between the Stalham and Tunstead Roads (also across the field from St Peter's Lane and the Hoveton Hall Estate). The wide hedgerow/verge alongside Stalham Road also provides shelter and a sustainable and permanent habitat for bats (of which there are a number), deer, hares and many species of birds.</p> <p>We have seen change and growth in the area over the last 45 years and appreciate it is to some extent inevitable, but feel a far greater spread of small groups/hamlets of properties would be far better culturally if they have to be in the rural landscape and may actually generate an improved sense of community, rather than the large, more impersonal estates, This might retain more of the local rural and tourist culture.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	<p>No</p>

<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>Object: The existing estate of Brook Park, between the Stalham and Tunstead Roads in Hoveton is already putting a heavy strain on the existing surface and foul water drainage systems. Building any additional houses will inevitably increase the strain and the solution proposed of the contractor funding into the existing and/or additional sewage holding tank in Belaugh, provided by Anglian Water, next to the river, seems irresponsible in the current climate where sewage effluent is an increasing environmental concern. The surface water drainage seems especially of concern with regard to this proposal (along with the impact of HV01/C), as the ground slopes down to Stalham Road. Currently the arable land absorbs a large amount of rainwater, without causing any issues in the field along Stalham Road, the bank of trees and shrubs greatly assists with this.</p> <p>The proposals also don't appear to take account of the high quality of arable land that will be lost. The fields between the Stalham and Tunstead Roads did not appear to have experienced the flooding which occurred elsewhere last Winter and this Spring.</p> <p>NNDC are essentially forcing the two old and inadequate bridges at Wroxham and Coltishall to cope with huge amounts of additional domestic traffic (not just from Hoveton) that would result from all these additional houses. There seems to be an attitude that by just filling in pockets of arable land around existing villages/towns, somehow the required services and amenities will be provided and that such expansion will be of great benefit culturally, just because of additional numbers. There should be far greater reassurance to current council tax payers that the existing services including Doctor's and Schools will be able to actually cope with all the additional pressures that all these additional homes will bring once populated.</p> <p>Environmentally the current design of estates appears to have no room for any real biodiversity. Irrespective of the size of a house, the allocated garden is so minimal that there is no room for trees or larger shrubs. The wide hedgerow/verge alongside Stalham Road also provides shelter and a sustainable and permanent habitat for bats (of which there are a number), deer, hares and many species of birds.</p>
<p>Officer Response</p>	<p>Comments noted. Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by the relevant site-specific policies and Anglian Water. More detail on this proposal is set out in the representations provided by the promoter at Regulation 19, which also includes reference to improvements to the Brook Park pumping station. Furthermore, both site-specific policies include requirements for enhancements towards sewerage infrastructure which should be undertaken prior to first occupation in order to prevent detriment to the environment and comply with the Water Framework Directive obligations.</p> <p>Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (C4, Page 25). Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.</p> <p>Both sites are within Grade 2 agricultural land, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. Hoveton is identified as a Small Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 due to its close connectivity to Wroxham, and is a sustainable location for development. Identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.</p> <p>The site-specific policy for both sites include requirements for a Transport Assessment to be undertaken for both proposed allocations in Hoveton that identifies sustainable traffic mitigation measures that will alleviate the potential cumulative impacts on the road network. Additionally, both policies require development to provide appropriate landscaping, open space and comply with the relevant policies in the Local Plan.</p>

Section	Proposed Change 5 - New Site Allocation: Land at Stalham Road, Hoveton (HV06/A)
ID	FC73
Response Date	22/11/2024 20:47:37
Full Name	Mrs Eileen Green
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	We were surprised to see the the remaining land which had not been built on in HV01/C has put planning in to build another 50 houses. The problems which have arisen from planning for 150 houses on HV01/B can only make things more difficult for doctors and schools if theses facilities cannot be extended to allow for growth. The problems arise from trying to built too many houses in such a small area.
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: We were surprised to see the the remaining land which had not been built on in HV01/C has put planning in to build another 50 houses. The problems which have arisen from planning for 150 houses on HV01/B can only make things more difficult for doctors and schools if theses facilities cannot be extended to allow for growth. The problems arise from trying to built too many houses in such a small area.
Officer Response	Hoveton is identified as a Small Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 due to its provision of services and close connectivity to Wroxham's own services and facilities, and is a sustainable location for development. Identifying growth in this area is in line with the Local Plan's strategy. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.
Section	Proposed Change 5 - New Site Allocation: Land at Stalham Road, Hoveton (HV06/A)
ID	FC75
Response Date	23/11/2024 11:08:57
Full Name	Mrs J Pond
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<ol style="list-style-type: none"> 1 What research/consultation was done about the effect on traffic on the bottle neck at Wroxham River Bridge? Everyone locally suffers from huge congestion where cars can be trailed back in queues for sometimes 4 miles in the summer. The inspector will not know about this congestion, but NNDC do. There are only 2 places to cross the river bure, one in Hoveton/Wroxham and the other in Coltishall, both having horrendous issues with traffic. Another proposed (in total) 300 properties with the associated traffic of school runs, supermarket delivery vans, bin collections etc will only increase this problem. 2 Hoveton/Wroxham residents and visitors suffer from the pollution from cars/lorries etc queueing in both directions from vehicles. Bearing in mind it has proved on the news that a school child died from pollution from roads next to her school - where are the air quality tests that NNDC has completed over a year (not just in a quiet month in January) to prove this won't get worse? Especially as so many children walk to the schools locally and holiday visitors are walking around. 3 Mark Twain quoted as saying "land, they're not making it any more". In the biggest agricultural county in the UK for producing grain and high quality land - why are NNDC insisting on building on this site which is Grade 1 and 2 land - the best possible quality

	<p>land there is? In the 5 grades of agricultural land (1 being top quality) - any housing should be only on poor quality grade 4/5 or brown field sites - not on prime land which threatens the UK food security.</p> <ol style="list-style-type: none"> 4 There is NO public parking whatsoever in Hoveton, not one space, it is all owned by private businesses who pay rates, taxes and insurance. What provisions have NNDC to deal with the future parking associated with this development site - particularly when they are already not dealing with parking issues in the village. 5 Hoveton/Wroxham is supposed to be "The Capital of the Broads National Park" - so turning into an increasingly urban area is just crazy. With the increase in associated traffic and the pollution, lack of parking etc - this is totally an unsuitable site. 6 As with other sites up for development - the local surgery, although new, is already over subscribed, no dental provision and emergency services would face the bottle neck traffic. Both primary and secondary schools are overloaded and already cause big congestion for parking and bus traffic. Where are these kids going to go to school? 7 There are known problems already for the disposal of sewage/drainage. Belaugh the pumping station cannot cope with what it has already so to increase the amount of waste is crazy. There is no adequate infrastructure and even a new pipeline to the site will not mean it copes - it will just mean more tankers to pump out a site which is already overloaded. 8 There are considerable flooding issues in the area already. The land slopes to the south and the recent adjacent development is already causing flooding and sewage leaking to the older properties in the area. What mitigation has been considered for disposal of waters in the gutters, hard surface drainage etc? Where is it supposed to go? 9 What provision have NNDC to insist that new builds are of the highest sustainable quality? All new builds should be mandatory to have solar panels, air source heat pumps, rainwater harvesting and heat recovery insulation. Are they insisting on this? 0 NNDC seem to be anti this area. Because we are on the fringe of their district and their world centres on Cromer, it appears the housing allocation has been "dumped" here because it is far away and they don't care about the effects of an unsuitable location. Broadland district council on the other side of the boundary and the river bridge, have refused allowing any houses to be built their side because of the effects of the traffic and ensuing congestion. 1 Will the inspector look on a map at the location in relation to where local roads are crossing the river? No one will ever afford a by pass here. Coltishall also has the same issues with developments the wrong side of river crossings. Developments must only be situated near roads that have the capacity to cope. The A1151 and A1150 have bottle necks over the Broads and rivers. That is never going away and must be taken into consideration. 2 What provision is made for disabled properties in their allocation? It is discrimination to not have housing for disabled. For those permanently in a wheelchair, stuck in a house with no ramp, no level access and requiring a wet room for a wheelchair and rooms/doors/kitchens for wheelchairs, they need specific housing. There is not one mention of the requirements in any NNDC developments to allocate/insist on this. 3 With a huge percentage of empty homes (over 1,000) and a well known amount of second homes (some areas in NNDC are over 50% creating over priced homes no local kids can buy), is NNDC going to make sure that these housing allocations ban second homes/holiday lets in their developments in a honeypot area
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	<p>No</p>
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>Object: What research/consultation was done about the effect on traffic on the bottle neck at Wroxham River Bridge? Everyone locally suffers from huge congestion where cars can be trailed back in queues for sometimes 4 miles in the summer. The inspector will not know about this congestion, but NNDC do. There are only 2 places to cross the river here, one in Hoveton/Wroxham and the other in Coltishall, both having horrendous issues with traffic. Hoveton/Wroxham residents and visitors suffer from the pollution from cars/lorries etc queueing in both directions from vehicles.</p> <p>Why are NNDC insisting on building on this site which is Grade 1 and 2 land - the best possible quality land there is? In the 5 grades of agricultural land (1 being top quality) - any housing should be only on poor quality grade 4/5 or brown field sites - not on prime land which threatens</p>

the UK food security. There is NO public parking whatsoever in Hoveton, not one space, it is all owned by private businesses who pay rates, taxes and insurance. What provisions have NNDC to deal with the future parking associated with this development site.

The local surgery, although new, is already over subscribed, no dental provision and emergency services would face the bottle neck traffic. Both primary and secondary schools are overloaded and already cause big congestion for parking and bus traffic.

There are known problems already for the disposal of sewage/drainage. Belaugh the pumping station cannot cope with what it has already so to increase the amount of waste is crazy. There is no adequate infrastructure and even a new pipeline to the site will not mean it copes. There are considerable flooding issues in the area already. The land slopes to the south and the recent adjacent development is already causing flooding and sewage leaking to the older properties in the area.

What provision have NNDC to insist that new builds are of the highest sustainable quality? it appears the housing allocation has been "dumped" here because it is far away and they don't care about the effects of an unsuitable location. The A1151 and A1150 have bottle necks over the Broads and rivers. That is never going away and must be taken into consideration.

What provision is made for disabled properties in their allocation? It is discrimination to not have housing for disabled. For those permanently in a wheelchair, stuck in a house with no ramp, no level access and requiring a wet room for a wheelchair and rooms/doors/kitchens for wheelchairs, they need specific housing.

Officer Response

Comments noted. The site-specific policy for both sites include requirements for a Transport Assessment to be undertaken for both proposed allocations in Hoveton that identifies sustainable traffic mitigation measures that will alleviate the potential cumulative impacts on the road network. The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and no objection to development in this location was raised. Mitigation options already exist for highways issues in Colitshall as identified in Policy NW62/A and its supporting evidence, which can be found in the Local Plan's examination library.

Both sites are within Grade 2 agricultural land, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. Hoveton is identified as a Small Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 due to the provision of services and close connectivity to Wroxham's own services and facilities therefore, it is a sustainable location for development. Identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth. The Council has a Brownfield Register, there are not enough sites on this register to accommodate the required growth needed as set out in Policy SS1 and many potential brownfield sites are unsuitable due to location or other constraints.

Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability. Education capacity information is provided by the Education Authority and financial contributions will be considered through the application process in line with Developer contribution policy HC4. The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning in Health Protocol. The protocol presents a process describing how relevant NHS organisations, Norfolk & Suffolk County Councils, Public Health and the Norfolk and East Suffolk Local Planning Authorities jointly engage to ensure that health considerations are adequately accounted for in plan making and in planning applications and their subsequent developments so that the appropriate authorities can plan and priorities investment(s).

Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by the relevant site-specific policies and Anglian Water. More detail on this proposal is set out in the representations provided by the promoter at Regulation 19, which also includes reference to improvements to the Brook Park pumping station. Furthermore, both site-specific policies include requirements for enhancements towards sewerage infrastructure which should be undertaken prior to first occupation in order

to prevent detriment to the environment and comply with the Water Framework Directive obligations.

Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (C4, Page 25). Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.

The site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan, including Policy ENV 8 - High Quality Design which makes references to the provision of adaptable homes.

Section	Proposed Change 5 - New Site Allocation: Land at Stalham Road, Hoveton (HV06/A)
ID	FC97
Response Date	25/11/2024 15:13:00
Full Name	Ms Eleanor Roberts
Organisation	Senior Sustainable Development Officer Water Management Alliance
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Thank you for consulting the Water Management Alliance on the North Norfolk Proposed Submission Version (Regulation 19 Publication) Local Plan. The Parishes included in the Housing Allocation Plan have some lands located within the boundary of the Internal Drainage District (IDD) of the Broads (2006) Internal Drainage Board (IDB) and Norfolk Rivers Internal Drainage Board (IDB). The Board's Byelaws therefore apply to those lands.</p> <p>A copy of the Board's Byelaws for The Broads IDB can be accessed on our website (https://www.wlma.org.uk/uploads/BIDB_Byelaws.pdf), along with maps of the IDD (https://www.wlma.org.uk/uploads/84-BIDB_drainindex.pdf). A copy of the Board's Byelaws for Norfolk Rivers IDB can be accessed on our website (https://www.wlma.org.uk/uploads/NRIDB_Byelaws.pdf), along with maps of the IDD (https://www.wlma.org.uk/uploads/179-NRIDB_Index.pdf).</p> <p>In keeping with other WMA member Boards, the principal function of the Broads (2006) IDB and Norfolk Rivers IDB is to provide flood protection within the Board's area. Certain watercourses within the IDD have been designated as 'Adopted Watercourses' by the Board. The adoption of a watercourse is an acknowledgement by the Board that the watercourse is of arterial importance to the IDD and as such, will normally receive maintenance from the IDD.</p> <p>For clarity, Main Rivers within each IDB are regulated by the Environment Agency.</p> <p>The Board's rationale and approach towards managing flood risk and water levels within the IDD is set out in the WMA Group's Planning and Byelaw Strategy document (https://www.wlma.org.uk/uploads/WMA_Planning_and_Byelaw_Policy.pdf).</p> <p>The Board will comment on planning for all major developments (10 or more properties) within the IDD watershed that are likely to discharge surface water into a watercourse within the IDD. Under certain circumstances, some major developments outside the IDD boundary may also be regulated by the Board's byelaws. We request that the Board is consulted as any planning application comes forward relating to any of the identified allocation sites.</p> <p>In order to reduce potential conflict between the planning process and the Board's regulatory regime and consenting process please be aware of the points set out below.</p> <p>Sites within WMA Board IDD</p> <ul style="list-style-type: none">• F10 Fakenham, Land South of Barons Close <p>This allocation site is partially within the Norfolk Rivers IDD, and I note the presence of a Board Adopted watercourse (DRN093G0101 – MN51 Fakenham) adjacent to the southern site boundary, as well as riparian watercourses to the east and west. For any future proposals at this site, please be aware of the following:</p> <ul style="list-style-type: none">•Surface water disposal from new developments should be in line with the drainage hierarchy (as per best practice).•If surface water is proposed to be disposed of via infiltration, we would recommend that the proposed strategy is supported by ground investigation to determine the infiltration potential

of the site and the depth to groundwater. If on-site material were to be considered favourable then we would advise infiltration testing in line with BRE Digest 365 (or equivalent) to be undertaken to determine its efficiency.

- If a surface water discharge is proposed to a watercourse, the proposed development will require land drainage consent in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment of a Surface Water Development Contribution fee, calculated in line with the Board's charging policy (https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf).
- The discharge of treated foul water to a watercourse within the IDD requires land drainage consent in line with the Board's byelaws (specifically byelaw 3).
- Any works within 9 metres of a Board adopted watercourse will require consent to relax Byelaw 10 (no obstructions within 9 metres of the edge of drainage or flood risk management infrastructure).
- If development proposals involve works to alter a Board Adopted watercourse, consent is required under Section 23 of the Land Drainage Act 1991 (and byelaw 4).
- Should any development proposals include works to alter a riparian watercourse (including culverting for access), consent will be required under Section 23 of the Land Drainage Act 1991 (and byelaw 4). The Board is responsible for consenting this activity within the IDD, while Norfolk County Council (the Lead Local Flood Authority) is the regulatory body outside the boundary of the IDD.

Sites outside WMA Board IDD with potential to negatively impact the IDD

- C22/2, Cromer, Land West of Pine Tree Farm
- F01/B, Fakenham, Land North of Rudham Stile Lane
- F02, Fakenham, Land Adjacent Petrol Filling Station
- F03, Fakenham, Land at Junction of A148 & B1146
- LUD01/A, Ludham, Land South of School Road
- NW01/B, North Walsham, Land at Norwich Road & Nursery Drive
- NW62/A, North Walsham, Land West of North Walsham
- E7, Tattersett, Tattersett Business Park

The above sites lie outside the Norfolk Rivers IDB's IDD, however have the potential to significantly impact the Board's district should a surface water discharge be proposed. We recommend that as each of these sites prepares to apply for planning permission, they ensure their drainage proposals are designed in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4 and with the input of the IDB. It is possible that consent will be required from the Board for surface water discharge from these sites. It is likely that significant improvement works will be required in the receiving catchments of these developments in order to accept resultant additional flows downstream, for the purpose of reducing flood risk upstream and we would welcome discussion as early as possible to come to any necessary agreements to reduce flood risk in both the Board's IDD downstream and new development upstream.

At this stage our advice for surface water drainage design is as follows:

- Surface water disposal from new developments should be in line with the drainage hierarchy (as per best practice).
- We recommend that a drainage strategy is supplied which has been considered in line with the Planning Practice Guidance SuDS discharge location hierarchy.
- If it is proposed that a site disposes of surface water via infiltration, we recommend that the viability of this proposal is evidenced by ground investigation followed by infiltration testing in line with BRE Digest 365.
- If a surface water discharge is proposed to a watercourse within the watershed catchment of the Board's IDD then we request that this be in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible.
- Should any development proposals include works to alter a riparian watercourse (including culverting for access), consent will be required under Section 23 of the Land Drainage Act 1991. The Board is responsible for consenting this activity within the IDD, while Norfolk County Council (the Lead Local Flood Authority) is the regulatory body outside the boundary of the IDD.

Sites outside WMA Board IDD less likely to negatively impact the IDD

- BLA04/A, Blakeney, Land East of Langham Road
- BRI01, Briston, Land East of Astley Primary School
- BRI02, Briston, Land West of Astley Primary School
- C07/2, Cromer, Land at Cromer High Station
- C16, Cromer, Former Golf Practice Ground, Overstrand Road
- H17, Holt, Land North of Valley Lane
- H20, Holt, Land at Heath Farm
- H27/1, Holt, Land at Heath Farm

- HV01/B*, Hoveton, Land East of Tunstead Road
- LUD06/A, Ludham, Land at Eastern End of Grange Road
- NW52, North Walsham, Land East of Bradfield Road
- MUN03/B, Mundesley, Land off Cromer Road & Church Lane
- SH04, Sheringham, Land Adjoining Seaview Crescent
- SH07, Sheringham, Former Allotments, Weybourne Road, Adjacent to 'The Reef'
- SH18/1B, Sheringham, Land South of Butts Lane
- ST19/A*, Stalham, Land Adjacent Ingham Road
- ST23/2*, Stalham, Land North of Yarmouth Road, East of Broadbeach Gardens
- W01/1, Wells-next-the-Sea, Land South of Ashburton Close
- W07/1, Wells-next-the-Sea, Land Adjacent Holkham Road

*We would expect to see successful infiltration in this location as per other recent local developments.

For the above sites, we have no initial concerns, however as stated above we would request that the WMA is consulted on any forthcoming planning applications at these sites. Our standing advice at this stage is as follows:

- Surface water disposal from new developments should be in line with the drainage hierarchy (as per best practice).
- We recommend that a drainage strategy is supplied which has been considered in line with the Planning Practice Guidance SuDS discharge location hierarchy.
- If it is proposed that a site disposes of surface water via infiltration, we recommend that the viability of this proposal is evidenced by ground investigation followed by infiltration testing in line with BRE Digest 365.
- If a surface water discharge is proposed to a watercourse within the watershed catchment of the Board's IDD then we request that this be in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible.
- Should any development proposals include works to alter a riparian watercourse (including culverting for access), consent will be required under Section 23 of the Land Drainage Act 1991. The Board is responsible for consenting this activity within the IDD, while Norfolk County Council (the Lead Local Flood Authority) is the regulatory body outside the boundary of the IDD.

Whilst the consenting process as set out under the Land Drainage Act 1991 and the aforementioned Byelaws are separate from planning, the ability to implement a planning permission may be dependent on the granting of these consents. As such we strongly recommend that developers seek the necessary consent prior to determination of a planning application. The Board's officers are available to respond to queries and provide advice.

Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	HV06/A is included in the table as a 'Sites outside WMA Board IDD with potential to negatively impact the IDD'.
Officer Response	Note: This response is an identical repeat of the WMA Reg 19 response with the exception that site HV06/A is included in the table as a 'Sites outside WMA Board IDD with potential to negatively impact the IDD'. Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by Anglian Water and set out in the representations provided by the promoter at Regulation 19.
Section	Proposed Change 5 - New Site Allocation: Land at Stalham Road, Hoveton (HV06/A)
ID	FC105
Response Date	29/11/2024 10:54:46
Full Name	Mr Dennis Willis
Organisation	
Agent Full Name	

Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILE No this proposed Change is unsound.
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	I have no confidence in NNDC planning dept nor that of builders in carrying out what is put to public consultation. The report raises concerns regarding the poor design of Brook Park and its impact on surface water flooding and the cumulative impact on more development will exacerbate this issue.
File (where submitted)	For the attention of the Examiner and those of the Councils regarding the further revised NORTH NORFOLK LOCAL PLAN(2).docx
Officer Summary	<p>Object: I have no confidence in NNDC planning dept nor that of builders in carrying out what is put to public consultation. The report raises concerns regarding the poor design of Brook Park and its impact on surface water flooding and the cumulative impact on more development will exacerbate this issue.</p> <p>Report is a detailed description of surface water flood risk concerns around the area of Hoveton where both proposed allocations are situated. This is in addition to concerns raised regarding drainage and the cumulative impact on sewerage infrastructure.</p> <p>There are a number of properties in Grange Close that suffer with surface water flooding, including raw sewage contamination, and sub surface drainage that has been affecting the area since the properties were built and the issues to date have not been resolved. The development of Brook Park 1 (HV03) is considered to have exacerbated these flooding issues. It is challenging to verify this last statement, but aside from recent acclaimed 'climate change' effects, the basic application of hydrodynamics and the geology of the area should be of priority consideration. It is a fact that rainfall and associated significant flooding has become more intense in the UK because of climate change or whatever you believe in. Don't build on land that will be affected by flooding and which will exacerbate drainage issues that already exist.</p>
Officer Response	<p>Comments noted. Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belough Water Recycling Centre as required by the relevant site-specific policies and Anglian Water. More detail on this proposal is set out in the representations provided by the promoter at Regulation 19, which also includes reference to improvements to the Brook Park pumping station. Furthermore, both site-specific policies include requirements for enhancements towards sewerage infrastructure which should be undertaken prior to first occupation in order to prevent detriment to the environment and comply with the Water Framework Directive obligations.</p> <p>Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (C4, Page 25). Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.</p>
Section	Proposed Change 5 - New Site Allocation: Land at Stalham Road, Hoveton (HV06/A)
ID	FC152
Response Date	06/12/2024 15:43:54
Full Name	Mr Russell Reeve
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>This response is informed by views expressed at a consultation event held with residents on 13th November.</p> <p>The large increase of 25% of current household numbers in total for Hoveton is unacceptable. An extension of the village onto prime agricultural land is not sensible. Once updated NNPF guidance is put in place, it is not certain that loss of such land will remain appropriate. NNDC</p>

must resist the current central government push towards achieving greater housing numbers, particularly target numbers generated using errant (2014) population migration figures. The GNLP (Greater Norwich Local Plan), covering Broadland, raised concerns about locating housing in neighbouring Wroxham in respect of traffic and of preserving the Broads tourism destinations. This limitation also applies equally to Hoveton. As such, NNDC have failed to take into account Wroxham Parish Council's Neighbourhood Plan in which: 'The vision is for Wroxham to remain a unique and beautiful waterside community. It will be developed in ways that are sensitive to its iconic location and the conservation area. There are no new allocations proposed and no allocations to be carried forward in this key service centre. Traffic constraints and proximity to the Broads restricts growth.'

The NNDC LP has not properly considered the GNLP's 4000 dwelling allocation for nearby Rackheath/ Salhouse. For Hoveton, this is already having an impact on roads, and has meant our schools and our health centre in Hoveton are already operating over capacity. Certainly, further housing in Hoveton should follow delivery of necessary capacity building for our junior and secondary schools, and also of our health centre.

There remains a disregard for the Broads Authority's Local Plan, with site allocations for Hoveton of a hotel and 13 dwellings on Station Road in Hoveton not mentioned.

Should additional housing need to be met within Hoveton, a suggested preferred site over now further extending HV01a would instead be on the little used bus/ long stay car park to the West of the railway station, and/ or also site HV10 on the Coltishall Road. These would both be relatively well located within the village, adjacent to the station, with footpath/ cycle way access into town available from HV10. These are also almost adjacent to the Belaugh WWTP. The car park would also then provide a 'grey field' site, rather than just using prime arable land. It would also spread development more evenly around the village, with reduced use of prime agricultural land.

Existing major shortcomings in village infrastructure cannot be adequately addressed through developer contributions.

Roads

NNDC has also not properly considered the inadequate highways infrastructure provided by the A1151, the sole route into the Broads, which passes through the centre of Hoveton. Necessary road improvements cannot be delivered, to adequately deal with the existing bottleneck over the narrow bridge between Hoveton and Wroxham.

The A1151 is already at capacity, with about 4.5 million vehicle journeys per year, with both the bridge and the mini roundabouts in Hoveton causing unacceptable delays.

The road is also subject to regular flooding with regularly collapsing sewers along part of its length, where built on marsh.

There is no understanding or recognition of the additional traffic arising from the 300+ dwellings also being proposed for Stalham, and villages North of Hoveton, such as Tunstead.

There are concerns about Air Quality, where the A1151 passes through central Hoveton. NNDC's draft Sustainability Appraisal Scoping Report stated that a Nitrogen Dioxide hotspot was identified in Hoveton due to the high levels of traffic and congestion in the village centre. There 'is potential for Nitrogen Dioxide levels to increase with an increase in population, vehicles, and traffic'.

There is also no bus service on the Tunstead Road as stated in the LP proposals from NNDC and also no mention of the obvious need for a pedestrian crossing on the Stalham Road.

Sewage

Despite assurances for capacity at the Belaugh WWTP to be improved by 2030, given current poor performance, the ability to accept and treat the foul water is uncertain. The Waste Water Treatment Plant is currently nearing its Technical Achievable Limit. The existing plant is also unable to properly function in flood conditions. Such sewage issues should be sorted before any development is agreed, and point to a delayed timing for any Hoveton development.

Flooding

In wet periods, the Stalham Road already suffers surface water flooding to the extent that surface water flows across the road to the lowest points nearby, causing flooding of roads and ingress into the foul water network. There are flooding and raw sewerage escape problems in Meadow Drive and Grange Close. This would be made worse by the proposed developments, especially of HV06, which is being built on a former pond opposite.

In central Hoveton, homes experience raw sewage in gardens and roadways by their property, especially when it is raining.

The extent of problems in Hoveton are so serious that NNDC should place a moratorium on development in Hoveton until suitable solutions have been put in place, and demonstrated to be effective.

This is especially as flooding of properties is likely to be made worse by the developments proposed, particularly for proposed development alongside the West side of the Stalham Road, as the rain water flows across the road, and floods properties opposite.

Facilities in village

	<p>Under the current S106 arrangements, Hoveton is potentially to be starved of infrastructure funds, unlike those towns and parish for which Community Infrastructure Levy (CIL) operates. The village may have difficulty in accessing funding for village improvements linked to additional housing, such as for modernisation of the village hall and improving the landscape and environment for the riverside area in the village.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	The proposed new allocation of land for housing as HV06A is not a sensible proposal for future development in/ around Hoveton
File (where submitted)	
Officer Summary	<p>Object: The large increase of 25% of current household numbers in total for Hoveton is unacceptable. An extension of the village onto prime agricultural land is not sensible. NNDC must resist the current central government push towards achieving greater housing numbers, particularly target numbers generated using errant (2014) population migration figures. The GNLP (Greater Norwich Local Plan), covering Broadland, raised concerns about locating housing in neighbouring Wroxham in respect of traffic and of preserving the Broads tourism destinations.</p> <p>The NNDC LP has not properly considered the GNLP's 4000 dwelling allocation for nearby Rackheath/ Salhouse. For Hoveton, this is already having an impact on roads, and has meant our schools and our health centre in Hoveton are already operating over capacity. There remains a disregard for the Broads Authority's Local Plan, with site allocations for Hoveton of a hotel and 13 dwellings on Station Road in Hoveton not mentioned.</p> <p>NNDC has also not properly considered the inadequate highways infrastructure provided by the A1151, the sole route into the Broads, which passes through the centre of Hoveton. Necessary road improvements cannot be delivered, to adequately deal with the existing bottleneck over the narrow bridge between Hoveton and Wroxham. The road is also subject to regular flooding with regularly collapsing sewers along part of its length, where built on marsh.</p> <p>There are concerns about Air Quality, where the A1151 passes through central Hoveton. NNDC's draft Sustainability Appraisal Scoping Report stated that a Nitrogen Dioxide hotspot was identified in Hoveton due to the high levels of traffic and congestion in the village centre.</p> <p>Despite assurances for capacity at the Belaugh WWTP to be improved by 2030, given current poor performance, the ability to accept and treat the foul water is uncertain. The Waste Water Treatment Plant is currently nearing its Technical Achievable Limit. The existing plant is also unable to properly function in flood conditions. Such sewage issues should be sorted before any development is agreed, and point to a delayed timing for any Hoveton development. In wet periods, the Stalham Road already suffers surface water flooding to the extent that surface water flows across the road to the lowest points nearby, causing flooding of roads and ingress into the foul water network. This is especially as flooding of properties is likely to be made worse by the developments proposed, particularly for proposed development alongside the West side of the Stalham Road, as the rain water flows across the road, and floods properties opposite.</p> <p>Under the current S106 arrangements, Hoveton is potentially to be starved of infrastructure funds, unlike those towns and parish for which Community Infrastructure Levy (CIL) operates. The village may have difficulty in accessing funding for village improvements linked to additional housing, such as for modernisation of the village hall and improving the landscape and environment for the riverside area in the village.</p>
Officer Response	<p>Comments noted. Both sites are within Grade 2 agricultural land, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. Hoveton is identified as a Small Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 due to the provision of services and close connectivity to Wroxham's own services and facilities therefore, it is a sustainable location for development. Identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local</p>

Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.

The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. The Inspector's response to the Local Plan (July 2024 EH006(f)) states the submitted Plan has a shortfall of housing provision and the Council are seeking to provide additional allocations to help mitigate this shortfall and meet the revised objectively assessed needs. The Council has engaged with neighbouring authorities and the County Council throughout the Local Plan process and have undertaken the necessary measures within site policies to address any possible cumulative impacts however, the Council is expected to meet its own housing targets and has identified an appropriate approach to achieve this.

The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and no objection to development in this location was raised. The site-specific policy for both sites include requirements for a Transport Assessment to be undertaken for both proposed allocations in Hoveton that identifies sustainable traffic mitigation measures that will alleviate the potential cumulative impacts on the road network. The site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan, including Policy CC13 - Protecting Environmental Quality which makes reference to air quality and the requirement for development proposals to minimise and take every opportunity to reduce through proportionate mitigation measures, all emissions, contamination and other forms of pollution.

Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by the relevant site-specific policies and Anglian Water. More detail on this proposal is set out in the representations provided by the promoter at Regulation 19, which also includes reference to improvements to the Brook Park pumping station. Furthermore, both site-specific policies include requirements for enhancements towards sewerage infrastructure which should be undertaken prior to first occupation in order to prevent detriment to the environment and comply with the Water Framework Directive obligations.

Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (C4, Page 25). Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.

Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.

Section	Proposed Change 5 - New Site Allocation: Land at Stalham Road, Hoveton (HV06/A)
ID	FC157
Response Date	06/12/2024 16:26:56
Full Name	Mr Ben Bethell
Organisation	Clerk and RFO Hoveton Community (Parish) Council
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILE No. The proposed change is not well considered. It is not justified.
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	As a Council with close ties to its community, we take these matters very seriously and would expect to be part of discussions at ALL stages.
File (where submitted)	NNDC LP response - Consultation December 2024 - Hoveton Community Council HV06A.pdf

<p>Officer Summary</p>	<p>Object: No. The proposed change is not well considered. It is not justified.</p> <p>The large increase of 25% of current household numbers in total for Hoveton is unacceptable. An extension of the village onto prime agricultural land is not sensible. NNDC must resist the current central government push towards achieving greater housing numbers, particularly target numbers generated using errant (2014) population migration figures. The GNLP (Greater Norwich Local Plan), covering Broadland, raised concerns about locating housing in neighbouring Wroxham in respect of traffic and of preserving the Broads tourism destinations.</p> <p>The NNDC LP has not properly considered the GNLP's 4000 dwelling allocation for nearby Rackheath/ Salhouse. For Hoveton, this is already having an impact on roads, and has meant our schools and our health centre in Hoveton are already operating over capacity. There remains a disregard for the Broads Authority's Local Plan, with site allocations for Hoveton of a hotel and 13 dwellings on Station Road in Hoveton not mentioned.</p> <p>NNDC has also not properly considered the inadequate highways infrastructure provided by the A1151, the sole route into the Broads, which passes through the centre of Hoveton. Necessary road improvements cannot be delivered, to adequately deal with the existing bottleneck over the narrow bridge between Hoveton and Wroxham. The road is also subject to regular flooding with regularly collapsing sewers along part of its length, where built on marsh.</p> <p>There are concerns about Air Quality, where the A1151 passes through central Hoveton. NNDC's draft Sustainability Appraisal Scoping Report stated that a Nitrogen Dioxide hotspot was identified in Hoveton due to the high levels of traffic and congestion in the village centre.</p> <p>Despite assurances for capacity at the Belaugh WWTP to be improved by 2030, given current poor performance, the ability to accept and treat the foul water is uncertain. The Waste Water Treatment Plant is currently nearing its Technical Achievable Limit. The existing plant is also unable to properly function in flood conditions. Such sewage issues should be sorted before any development is agreed, and point to a delayed timing for any Hoveton development. In wet periods, the Stalham Road already suffers surface water flooding to the extent that surface water flows across the road to the lowest points nearby, causing flooding of roads and ingress into the foul water network. This is especially as flooding of properties is likely to be made worse by the developments proposed, particularly for proposed development alongside the West side of the Stalham Road, as the rain water flows across the road, and floods properties opposite.</p> <p>Under the current S106 arrangements, Hoveton is potentially to be starved of infrastructure funds, unlike those towns and parish for which Community Infrastructure Levy (CIL) operates. The village may have difficulty in accessing funding for village improvements linked to additional housing, such as for modernisation of the village hall and improving the landscape and environment for the riverside area in the village.</p>
<p>Officer Response</p>	<p>Comments noted. Both sites are within Grade 2 agricultural land, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan.</p> <p>Hoveton is identified as a Small Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 due to the provision of services and close connectivity to Wroxham's own services and facilities therefore, it is a sustainable location for development. Identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.</p> <p>The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. The Inspector's response to the Local Plan (July 2024 EH006(f)) states the submitted Plan has a shortfall of housing provision and the Council are seeking to provide additional allocations to help mitigate this shortfall and meet the revised objectively assessed needs. The Council has engaged with neighbouring authorities and the County Council throughout the Local Plan process and have undertaken the necessary measures within site policies to address any possible cumulative impacts however, the Council is expected to meet its own housing targets and has identified an appropriate approach to achieve this.</p> <p>The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and no objection to development in this location was raised. The site-specific policy for both sites include requirements for a Transport Assessment to be undertaken for both proposed allocations in Hoveton that identifies</p>

sustainable traffic mitigation measures that will alleviate the potential cumulative impacts on the road network. The site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan, including Policy CC13 - Protecting Environmental Quality which makes reference to air quality and the requirement for development proposals to minimise and take every opportunity to reduce through proportionate mitigation measures, all emissions, contamination and other forms of pollution.

Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by the relevant site-specific policies and Anglian Water. More detail on this proposal is set out in the representations provided by the promoter at Regulation 19, which also includes reference to improvements to the Brook Park pumping station. Furthermore, both site-specific policies include requirements for enhancements towards sewerage infrastructure which should be undertaken prior to first occupation in order to prevent detriment to the environment and comply with the Water Framework Directive obligations.

Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (C4, Page 25). Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.

Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.

Section	Proposed Change 5 - New Site Allocation: Land at Stalham Road, Hoveton (HV06/A)
ID	FC172
Response Date	08/12/2024 18:42:41
Full Name	Mrs Hilary Reeve
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>An extension of the village onto prime agricultural land is not sensible. Once updated NNPF guidance is put in place, it is not certain that loss of such land will remain appropriate. NNDC must resist the current central government push towards achieving greater housing numbers, particularly target numbers generated using errant (2014) population migration figures. The GNLP (Greater Norwich Local Plan), covering Broadland, raised concerns about locating housing in neighbouring Wroxham in respect of traffic and of preserving the Broads tourism destinations. This limitation also applies equally to Hoveton. As such, NNDC have failed to take into account Wroxham Parish Council's Neighbourhood Plan in which: 'The vision is for Wroxham to remain a unique and beautiful waterside community. It will be developed in ways that are sensitive to its iconic location and the conservation area. There are no new allocations proposed and no allocations to be carried forward in this key service centre. Traffic constraints and proximity to the Broads restricts growth.'</p> <p>The NNDC LP has not properly considered the GNLP's 4000 dwelling allocation for nearby Rackheath/ Salhouse. For Hoveton, this is already having an impact on roads, and has meant our schools and our health centre in Hoveton are already operating over capacity. Certainly, further housing in Hoveton should follow delivery of necessary capacity building for our junior and secondary schools, and also of our health centre.</p> <p>There remains a disregard for the Broads Authority's Local Plan, with site allocations for Hoveton of a hotel and 13 dwellings on Station Road in Hoveton not mentioned.</p> <p>Should additional housing need to be met within Hoveton, a suggested preferred site over now further extending HV01a would instead be on the little used bus/ long stay car park to the West of the railway station, and/ or also site HV10 on the Coltishall Road. These would both be relatively well located within the village, adjacent to the station, with footpath/ cycle way access into town available from HV10. These are also almost adjacent to the Belaugh WWTP. The car park would also then provide a 'grey field' site, rather than just using prime arable land. It would also spread development more evenly around the village, with reduced use of prime agricultural land.</p> <p>Existing major shortcomings in village infrastructure cannot be adequately addressed through developer contributions.</p>

Roads

NNDC has also not properly considered the inadequate highways infrastructure provided by the A1151, the sole route into the Broads, which passes through the centre of Hoveton. Necessary road improvements cannot be delivered, to adequately deal with the existing bottleneck over the narrow bridge between Hoveton and Wroxham. The A1151 is already at capacity, with about 4.5 million vehicle journeys per year, with both the bridge and the mini roundabouts in Hoveton causing unacceptable delays. The road is also subject to regular flooding with regularly collapsing sewers along part of its length, where built on marsh. There is no understanding or recognition of the additional traffic arising from the 300+ dwellings also being proposed for Stalham, and villages North of Hoveton, such as Tunstead. There are concerns about Air Quality, where the A1151 passes through central Hoveton. NNDC's draft Sustainability Appraisal Scoping Report stated that a Nitrogen Dioxide hotspot was identified in Hoveton due to the high levels of traffic and congestion in the village centre. There 'is potential for Nitrogen Dioxide levels to increase with an increase in population, vehicles, and traffic'. There is also no bus service on the Tunstead Road as stated in the LP proposals from NNDC and also no mention of the obvious need for a pedestrian crossing on the Stalham Road.

Sewage

Despite assurances for capacity at the Belaugh WWTP to be improved by 2030, given current poor performance, the ability to accept and treat the foul water is uncertain. The Waste Water Treatment Plant is currently nearing its Technical Achievable Limit. The existing plant is also unable to properly function in flood conditions. Such sewage issues should be sorted before any development is agreed, and point to a delayed timing for any Hoveton development.

Flooding

In wet periods, the Stalham Road already suffers surface water flooding to the extent that surface water flows across the road to the lowest points nearby, causing flooding of roads and ingress into the foul water network. There are flooding and raw sewerage escape problems in Meadow Drive and Grange Close. This would be made worse by the proposed developments, especially of HV06, which is being built on a former pond opposite. In central Hoveton, homes experience raw sewage in gardens and roadways by their property, especially when it is raining. The extent of problems in Hoveton are so serious that NNDC should place a moratorium on development in Hoveton until suitable solutions have been put in place, and demonstrated to be effective. This is especially as flooding of properties is likely to be made worse by the developments proposed, particularly for proposed development alongside the West side of the Stalham Road, as the rain water flows across the road, and floods properties opposite.

Facilities in village

Under the current S106 arrangements, Hoveton is potentially to be starved of infrastructure funds, unlike those towns and parish for which Community Infrastructure Levy (CIL) operates. The village may have difficulty in accessing funding for village improvements linked to additional housing, such as for modernisation of the village hall and improving the landscape and environment for the riverside area in the village.

Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: An extension of the village onto prime agricultural land is not sensible. NNDC must resist the current central government push towards achieving greater housing numbers, particularly target numbers generated using errant (2014) population migration figures. The GNLP (Greater Norwich Local Plan), covering Broadland, raised concerns about locating housing in neighbouring Wroxham in respect of traffic and of preserving the Broads tourism destinations.</p> <p>The NNDC LP has not properly considered the GNLP's 4000 dwelling allocation for nearby Rackheath/ Salhouse. For Hoveton, this is already having an impact on roads, and has meant our schools and our health centre in Hoveton are already operating over capacity. There remains a disregard for the Broads Authority's Local Plan, with site allocations for Hoveton of a hotel and 13 dwellings on Station Road in Hoveton not mentioned.</p>

NNDC has also not properly considered the inadequate highways infrastructure provided by the A1151, the sole route into the Broads, which passes through the centre of Hoveton. Necessary road improvements cannot be delivered, to adequately deal with the existing bottleneck over the narrow bridge between Hoveton and Wroxham. The road is also subject to regular flooding with regularly collapsing sewers along part of its length, where built on marsh.

There are concerns about Air Quality, where the A1151 passes through central Hoveton. NNDC's draft Sustainability Appraisal Scoping Report stated that a Nitrogen Dioxide hotspot was identified in Hoveton due to the high levels of traffic and congestion in the village centre.

Despite assurances for capacity at the Belaugh WWTP to be improved by 2030, given current poor performance, the ability to accept and treat the foul water is uncertain. The Waste Water Treatment Plant is currently nearing its Technical Achievable Limit. The existing plant is also unable to properly function in flood conditions. Such sewage issues should be sorted before any development is agreed, and point to a delayed timing for any Hoveton development. In wet periods, the Stalham Road already suffers surface water flooding to the extent that surface water flows across the road to the lowest points nearby, causing flooding of roads and ingress into the foul water network. This is especially as flooding of properties is likely to be made worse by the developments proposed, particularly for proposed development alongside the West side of the Stalham Road, as the rain water flows across the road, and floods properties opposite.

Under the current S106 arrangements, Hoveton is potentially to be starved of infrastructure funds, unlike those towns and parish for which Community Infrastructure Levy (CIL) operates. The village may have difficulty in accessing funding for village improvements linked to additional housing, such as for modernisation of the village hall and improving the landscape and environment for the riverside area in the village.

Officer Response

Comments noted. Both sites are within Grade 2 agricultural land, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. Hoveton is identified as a Small Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 due to the provision of services and close connectivity to Wroxham's own services and facilities therefore, it is a sustainable location for development. Identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.

The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. The Inspector's response to the Local Plan (July 2024 EH006(f)) states the submitted Plan has a shortfall of housing provision and the Council are seeking to provide additional allocations to help mitigate this shortfall and meet the revised objectively assessed needs. The Council has engaged with neighbouring authorities and the County Council throughout the Local Plan process and have undertaken the necessary measures within site policies to address any possible cumulative impacts however, the Council is expected to meet its own housing targets and has identified an appropriate approach to achieve this.

The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and no objection to development in this location was raised. The site-specific policy for both sites include requirements for a Transport Assessment to be undertaken for both proposed allocations in Hoveton that identifies sustainable traffic mitigation measures that will alleviate the potential cumulative impacts on the road network. The site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan, including Policy CC13 - Protecting Environmental Quality which makes reference to air quality and the requirement for development proposals to minimise and take every opportunity to reduce through proportionate mitigation measures, all emissions, contamination and other forms of pollution.

Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by the relevant site-specific policies and Anglian Water. More detail on this proposal is set out in the representations provided by the promoter at Regulation 19, which also includes reference to improvements to the Brook Park pumping station. Furthermore, both site-specific policies include requirements for enhancements towards sewerage infrastructure which should be undertaken prior to first occupation in order

to prevent detriment to the environment and comply with the Water Framework Directive obligations.

Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (C4, Page 25). Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.

Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.

Section	Proposed Change 5 - New Site Allocation: Land at Stalham Road, Hoveton (HV06/A)
ID	FC189
Response Date	09/12/2024 12:23:25
Full Name	Mr Julian Wells
Organisation	Director FW Properties
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>The Developer of the site, FW Properties, reserves the right to appear prior to the publication of the draft agendas that will set out the Inspector's matters and questions to form the basis of the discussions at the Hearings. The intention to appear is to seek to ensure that the Policy can be made sound, and in particular, deliverable over the plan period.</p> <p>The developer, FW Properties, fully supports the proposed allocation of additional land at Stalham Road, Hoveton under Policy Site HV06A for the following reasons;</p> <ul style="list-style-type: none"> • This additional site (alongside Site HVOIC) will help to facilitate the provision of significant public benefits from the development including the delivery of major off-site highway works at the junction of Stalham and Horning roads and the construction of a new Anglian Water foul water drainage pipe and pumping station from the site to the Belaugh Waste Water Treatment Works. • To deliver housing, for which there is an identified need, in a highly sustainable location. • To provide a higher quality layout of development (alongside Site HVOIC) with an appropriate mix of house types and bungalows on larger than average sized plots within a lesser scheme density more in keeping with the rest of the village. • The scheme (alongside Site HVOIC) will also be able to provide a greater than policy required open space provision with an improved landscaping buffer along the boundary to the retained arable field to the north. • To deliver the policy required number of affordable housing units in the scheme. <p>We do however request, in order to make the allocation sound, that the site area is corrected to 4.66 hectares from the 2.94 hectares outlined in the draft allocation. In addition, we need to further understand the policy requirement of the appropriate off-site mitigation improvements to the A1151/A1062 double mini roundabout to be undertaken prior to first occupation -this provision will impose a significant delivery risk to the project in the event that these off-site works were delayed for any reason. We therefore request that the completion date of these off-site works is extended. These two changes will then ensure that the Policy is justified.</p> <p>FW Properties confirms that the development of the site meets the three tests set out in the NPPF - the site is available, suitable and deliverable for the Proposed Development taking into account the policy requirements of the emerging North Norfolk Local Plan. We also confirm that we can meet the site-specific requirements as set out within the draft allocation for the site. The developer is intending to enter into a credit purchase agreement for Nutrients Neutrality and will progress an on-site solution for BNG.</p> <p>FW Properties will shortly be submitting pre-apps to the planners, Highways and to the LLFA for the development of the site (including the adjoining Site HVOIC). As part of the scheme evolution for the site, we have undertaken the initial surveys across the site which have not identified any project delivery concerns. We are in discussions with Anglian Water in relation to the foul drainage requirements and with Highways for the new access on to Tunstead Road and for the off-site highway works to the junction of Stalham and Horning Roads. As a result, we believe the scheme for the site is viable and fully deliverable.</p> <p>The Landowner owns the entire site (including Site HVOIC). FW Properties have exchanged legal contracts with the Landowner to progress the planning and development of the site</p>

	<p>(including the adjoining Site HV01C) so all the land required is in full control of the Developer and available for development. FW Properties is an experienced developer who have a good track record of delivering high quality developments in the area and have recently completed 25 new houses in Hoveton. We are fully committed to developing the site.</p> <p>Following the pre-apps at the beginning of 2025, FW Properties are intending to submit the detailed planning application for the whole scheme (including the adjoining Site HV01C) in Summer 2025 alongside the adoption of the emerging North Norfolk Local Plan. We will commence the development of the new homes as soon as possible following receipt of planning consent and once we have agreed the drainage works with Anglian Water and the highway works with Highways. The scheme is likely to be delivered in one phase with the 50 houses being completed in 2030/31.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	The Developer of the site, FW Properties, reserves the right to appear prior to the publication of the draft agendas that will set out the Inspector's matters and questions to form the basis of the discussions at the Hearings. The intention to appear is to seek to ensure that the Policy can be made sound, and in particular, deliverable over the plan period.
File (where submitted)	
Officer Summary	<p>Support: The Developer of the site, FW Properties, reserves the right to appear prior to the publication of the draft agendas that will set out the Inspector's matters and questions to form the basis of the discussions at the Hearings. The intention to appear is to seek to ensure that the Policy can be made sound, and in particular, deliverable over the plan period. The developer, FW Properties, fully supports the proposed allocation of additional land at Stalham Road.</p> <ul style="list-style-type: none"> • This additional site (alongside Site HVO1C) will help to facilitate the provision of significant public benefits from the development including the delivery of major off-site highway works at the junction of Stalham and Horning roads and the construction of a new Anglian Water foul water drainage pipe and pumping station from the site to the Belough Waste Water Treatment Works. • To deliver housing, for which there is an identified need, in a highly sustainable location. • To provide a higher quality layout of development (alongside Site HVO1C) with an appropriate mix of house types and bungalows on larger than average sized plots within a lesser scheme density more in keeping with the rest of the village. • The scheme (alongside Site HVO1C) will also be able to provide a greater than policy required open space provision with an improved landscaping buffer along the boundary to the retained arable field to the north. • To deliver the policy required number of affordable housing units in the scheme. <p>We do however request, in order to make the allocation sound, that the site area is corrected to 4.66 hectares from the 2.94 hectares outlined in the draft allocation. In addition, we need to further understand the policy requirement of the appropriate off-site mitigation improvements to the A1151/A1062 double mini roundabout to be undertaken prior to first occupation -this provision will impose a significant delivery risk to the project in the event that these off-site works were delayed for any reason. We therefore request that the completion date of these off-site works is extended.</p> <p>FW Properties will shortly be submitting pre-apps to the planners, Highways and to the LLFA for the development of the site (including the adjoining Site HVO1C). As part of the scheme evolution for the site, we have undertaken the initial surveys across the site which have not identified any project delivery concerns. We are in discussions with Anglian Water in relation to the foul drainage requirements and with Highways for the new access on to Tunstead Road and for the off-site highway works to the junction of Stalham and Horning Roads. As a result, we believe the scheme for the site is viable and fully deliverable. The Landowner owns the entire site (including Site HV01C). FW Properties have exchanged legal contracts with the Landowner to progress the planning and development of the site (including the adjoining Site HV01C) so all the land required is in full control of the Developer and available for development.</p> <p>We are fully committed to developing the site.</p> <p>Following the pre-apps at the beginning of 2025, FW Properties are intending to submit the detailed planning application for the whole scheme (including the adjoining Site HV01C) in Summer 2025 alongside the adoption of the emerging North Norfolk Local Plan. We will commence the development of the new homes as soon as possible following receipt of planning consent and once we have agreed the drainage works with Anglian Water and the highway works with Highways. The scheme is likely to be delivered in one phase with the 50 houses being completed in 2030/31.</p>

Officer Response	<p>Comments and support for the site is noted. Agree in part to consider modification and amend as necessary. See modification schedule. The Council confirm the proposed modification to amend the site area is a necessary clarification for soundness. The policy requirement to provide appropriate off-site mitigation improvements to the A1151/A1062 double mini roundabout is a result of discussions undertaken between the Council and the Highways Authority and has been identified due to the increase in development identification of a new site. The Council consider this to be a necessary inclusion within the policy.</p> <p>The Council will continue to engage with the site promoters to ensure the site's delivery through the Local Plan process.</p>
Section	Proposed Change 5 - New Site Allocation: Land at Stalham Road, Hoveton (HV06/A)
ID	FC243
Response Date	11/12/2024 17:13:00
Full Name	Mrs Debbie Mack
Organisation	Historic Environment Planning Adviser Historic England
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>UNSOUND</p> <p>There are no designated heritage assets on the site. The grade II* listed Church of St Peter and grade II listed ice house are located to the north of the site but these are at sufficient distance from the site, and in the case of the ice house, in a well wooded location. The non-registered landscape surrounding the grade II listed Hoveton Hall lies to the north of the site.</p> <p>We welcome the preparation of an Heritage Impact Assessment for this site (Additional Sites Review Background Paper p56-59) (https://www.north-norfolk.gov.uk/media/10669/fc002-additional-sites-review.pdf). The findings of the HIA including any recommendations for mitigation/enhancement, should be used to inform revised policy wording.</p> <p>It is our view that the impacts, effects and consequent recommendations in the HIA have not been fully taken into account in the policy formulation. To that end the site-specific requirements for the development of the site would not be effective and would not be consistent with national policy to secure the conservation and enhancement of the historic environment.</p> <p>We therefore recommend amending policy criterion 1 as follows:</p> <p>1. Delivery of a carefully designed residential development that will integrate into the surrounding character, <u>with lower density, single storey dwellings on the northern part of the site.</u>'</p> <p>We welcome criterion 5 which requires a landscaping buffer to the north of the site and referenced the Hoveton Hall Park and Garden but there is currently no mention of the listed church in the proposed policy wording. The HIA also mentioned landscaping along the western boundary and Stalham Road.</p> <p>We therefore recommend amending criterion 5 to read:</p> <p>5. Provision of a landscaping buffer to the <u>west and north</u> of the site to soften the boundary between the development and the agricultural land to the north and mitigate potential impacts on heritage assets, including the Hoveton Hall Park and Garden, <u>St Peters Church and the Ice House Landscaping should also be strengthened along Stalham Road;</u></p> <p>As currently drafted, the allocation is not consistent with national policy due to impacts on the historic environment and the policy wording is not effective in conserving and enhancing the historic environment. The allocation is therefore, in our view, unsound.</p> <p>The inclusion of this change suggested above would help to ensure that site-specific requirements for development of the site are justified by the findings of the HIA, consistent with national policy and effective in conserving and enhancing the historic environment.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please	

outline why you consider this to be necessary:	
File (where submitted)	241218 HE response letter NNLP Further Consult.pdf
Officer Summary	<p>UNSOUND</p> <p>There are no designated heritage assets on the site. The grade II* listed Church of St Peter and grade II listed ice house are located to the north of the site but these are at sufficient distance from the site, and in the case of the ice house, in a well wooded location. The non-registered landscape surrounding the grade II listed Hoveton Hall lies to the north of the site.</p> <p>We welcome the preparation of an Heritage Impact Assessment for this site (Additional Sites Review Background Paper p56-59) (https://www.north-norfolk.gov.uk/media/10669/fc002-additional-sites-review.pdf). The findings of the HIA including any recommendations for mitigation/enhancement, should be used to inform revised policy wording. It is our view that the impacts, effects and consequent recommendations in the HIA have not been fully taken into account in the policy formulation. To that end the site-specific requirements for the development of the site would not be effective and would not be consistent with national policy to secure the conservation and enhancement of the historic environment.</p> <p>We therefore recommend amending policy criterion 1 as follows:</p> <p>1. Delivery of a carefully designed residential development that will integrate into the surrounding character, <u>with lower density, single storey dwellings on the northern part of the site.</u></p> <p>We welcome criterion 5 which requires a landscaping buffer to the north of the site and referenced the Hoveton Hall Park and Garden but there is currently no mention of the listed church in the proposed policy wording. The HIA also mentioned landscaping along the western boundary and Stalham Road.</p> <p>As currently drafted, the allocation is not consistent with national policy due to impacts on the historic environment and the policy wording is not effective in conserving and enhancing the historic environment. The allocation is therefore, in our view, unsound.</p> <p>The inclusion of this change suggested above would help to ensure that site-specific requirements for development of the site are justified by the findings of the HIA, consistent with national policy and effective in conserving and enhancing the historic environment.</p>
Officer Response	Comments noted. Agree in part to consider modification and amend as necessary. See modification schedule. The HIA undertaken in Appendix 2 of the Initial Sites Review Background Paper appropriately identifies the concerns raised and these have been mitigated through requirements within the site-specific policy which includes the provision of a landscape buffer along the northern boundary which provides appropriate mitigation.
Section	Proposed Change 5 - New Site Allocation: Land at Stalham Road, Hoveton (HV06/A)
ID	FC352
Response Date	19/12/2024 10:30:19
Full Name	Mr Christopher Yardley
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	The current assessment and policy for this site does not adequately address landscape impacts in relation to the wider damaging effects of the proposed development. The current proposals do not make sufficient provision for landscaping to the northern, and western sides of the site to screen and integrate development into the landscape. A buffer of woodland of at least 30m is the least that can be considered appropriate -and would have been a standard provision in the 1990s / early 2000s, but more recent developments have discarded this and the results are ugly, uncharacteristic of older settlement types and damaging to the wider environment. This will protect the landscape beyond the site which is part of an attractive rural location. This is a sensitive, intimate and attractive rural landscape which needs to be protected. This is not highlighted sufficiently in the policy. So many developments on the edge of settlements seem to simply abut up to the boundary with possibly a hedge between them and the open rural landscape beyond. This is out of character with the majority of older, organic development and until about 10 years ago, the better designed and landscaped new developments. Similarly large dwellings on the boundary are inappropriate. Too often large 'land mark' dwellings of three stories are placed on prominent positions around such

	developments - these are totally alien to any previous development styles and should be formally prevented
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	The current assessment and policy for this site does not adequately address landscape impacts in relation to the wider damaging effects of the proposed development. The current proposals do not make sufficient provision for landscaping to the northern, and western sides of the site to screen and integrate development into the landscape. A buffer of woodland of at least 30m is the least that can be considered appropriate. This will protect the landscape beyond the site which is part of an attractive rural location. This is a sensitive, intimate and attractive rural landscape which needs to be protected. This is not highlighted sufficiently in the policy.
Officer Response	Comments noted. The site-specific policy includes the provision of open space and landscape buffering to the north. The provision of a 30m buffer on the eastern boundary as well as the northern boundary would significantly impact the site's ability to deliver the required level of growth needed for the Local Plan and restrict the site's ability to create a high-quality designed development.
Section	Proposed Change 5 - New Site Allocation: Land at Stalham Road, Hoveton (HV06/A)
ID	FC376
Response Date	18/12/2024 11:24:36
Full Name	Mr Dennis Willis
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	The reference to LURA regarding HV01/C and HV06/A is confusing. It may allow developers to use this as a loophole and proceed before 2030 as I understand from definition below this is NOT a statutory requirement UNTIL 2030. The WRC at Belaugh and associated NEW infrastructure MUST be sanctioned and financed and agreed if developments go ahead. From: LURA: The upgrading of wastewater treatment facilities, to remove nutrient pollution at source, is a vital step towards removing nutrient neutrality restrictions on new developments in large parts of England, although it will take some time for the impact of these upgrades to be felt – as the statutory upgrade date is not until 2030.
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	Would like to hear replies to my comments.
File (where submitted)	
Officer Summary	Object: The reference to LURA regarding HV01/C and HV06/A is confusing. It may allow developers to use this as a loophole and proceed before 2030 as I understand from definition below this is NOT a statutory requirement UNTIL 2030. The WRC at Belaugh and associated NEW infrastructure MUST be sanctioned and financed and agreed if developments go ahead. From: LURA: The upgrading of wastewater treatment facilities, to remove nutrient pollution at source, is a vital step towards removing nutrient neutrality restrictions on new developments in large parts of England, although it will take some time for the impact of these upgrades to be felt – as the statutory upgrade date is not until 2030.

Officer Response	<p>Comments noted. Both sites in Hoveton are expected to begin delivery prior to 2030 and be included within the Council's Five Year Housing Land Supply. With regard to Nutrient Neutrality, both sites will be expected to provide mitigation and this will be achieved through the purchasing of credits.</p> <p>Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by the relevant site-specific policies and Anglian Water. More detail on this proposal is set out in the representations provided by the promoter at Regulation 19, which also includes reference to improvements to the Brook Park pumping station. Furthermore, both site-specific policies include requirements for enhancements towards sewerage infrastructure which should be undertaken prior to first occupation in order to prevent detriment to the environment and comply with the Water Framework Directive obligations.</p>
Section	Proposed Change 5 - New Site Allocation: Land at Stalham Road, Hoveton (HV06/A)
ID	FC413
Response Date	19/12/2024 11:24:48
Full Name	Dr Jonathan Gould
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>North Norfolk only had 1.5% population growth between 2011-2021. The population is 103,000 (Census 2021). This growth rate would project homes required for 1500 more people every ten years. Even for 20 years, this would be homes for 3,000 people, much less than the population growth of in excess of 8,000 people projected in the local plan. The local plan requirement for over 10,000 homes is a massive oversupply to what is needed.</p> <p>Hoveton is only a village of population 1,750 but it is being treated as a growth town alongside towns of populations 7,000 to 13,000. It does not have the infrastructure to support 20% population growth. Hoveton has already absorbed 16% population growth with the Brook Park development of 2014. Hoveton Village centre infrastructure already supports the Wroxham population and a large tourist industry which produces high pressure on services and infrastructure.</p> <p>There are infrastructure issues in Hoveton:</p> <ul style="list-style-type: none"> • Foul water drainage to Belaugh. Issues widely documented. • Doctors surgery including appointments and staff • Schools support the local population including the new Rackheath and Stalham developments and the new housing proposed for Tunstead in the small growth villages plan. • Significantly increased surface water drainage requirements due to climate change. Hoveton and Wroxham already regularly flood in the autumn and winter. • Wroxham Bridge and traffic. Wroxham already has traffic jams. <p>There have already been new dwellings at Brook Park. The build quality issues are still being sorted out including surface water drainage issues. There have been many issues with the Victory Housing tenants. I do like the central green space at Brook Park.</p> <p><u>Site</u></p> <p>Modest expansion only at Hoveton. The current plans as stated above are excessive. A good builder is required. The work at Churchfields is much better than Brook Park which is poor. I like sheltered accommodation similar to in Stalham. But they are close to facilities. Bungalows are well suited to Hoveton. The Mallards development at Ash Drive, Martham is a good example.</p> <p>The site is a long way from village facilities for older people.</p> <p>Surface water drainage must be considered. This appears to have been handled much better at Churchfields and at the Martham Mallards development than at Brook Park.</p> <p>Broads villages have particular access issues with bridges at Coltishall, Wroxham and Potter Heigham. The first two are old, small bridges which are already bottlenecks. Hoveton has a thriving tourism industry that would be damaged by congestion.</p> <p>There are many other areas in North Norfolk with better road access to develop housing in. Fixing quality issues with recent builds and suitable infrastructure should be a pre-requisite before building more. New housing needs to be the right housing, the right amount in the right place with the right infrastructure.</p>

Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: North Norfolk only had 1.5% population growth between 2011-2021. The population is 103,000 (Census 2021). This growth rate would project homes required for 1500 more people every ten years. Even for 20 years, this would be homes for 3,000 people, much less than the population growth of in excess of 8,000 people projected in the local plan. The local plan requirement for over 10,000 homes is a massive oversupply to what is needed. It does not have the infrastructure to support 20% population growth. Hoveton has already absorbed 16% population growth with the Brook Park development of 2014.</p> <ul style="list-style-type: none"> • Foul water drainage to Belaugh. Issues widely documented. • Doctors surgery including appointments and staff • Schools support the local population including the new Rackheath and Stalham developments and the new housing proposed for Tunstead in the small growth villages plan. • Significantly increased surface water drainage requirements due to climate change. Hoveton and Wroxham already regularly flood in the autumn and winter. • Wroxham Bridge and traffic. Wroxham already has traffic jams. <p>Modest expansion only at Hoveton. The current plans as stated above are excessive. Surface water drainage must be considered. Broads villages have particular access issues with bridges at Coltishall, Wroxham and Potter Heigham. The first two are old, small bridges which are already bottlenecks. Hoveton has a thriving tourism industry that would be damaged by congestion.</p> <p>The site is a long way from village facilities for older people Tunstead Road and Two Saints Close are much lower density housing than the new proposals. If the HV01/C site goes ahead in any form, a roundabout at Two Saints Drive with access to the new site would be recommended. Surface water drainage must be considered.</p> <p>There are many other areas in North Norfolk with better road access to develop housing in. Fixing quality issues with recent builds and suitable infrastructure should be a pre-requisite before building more. New housing needs to be the right housing, the right amount in the right place with the right infrastructure.</p>
Officer Response	<p>Comments noted. The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. The Inspector's response to the Local Plan (July 2024 EH006(f)) states the submitted Plan has a shortfall of housing provision and the Council are seeking to provide additional allocations to help mitigate this shortfall and meet the revised objectively assessed needs. Hoveton is identified as a Small Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 due to the provision of services and close connectivity to Wroxham's own services and facilities therefore, it is a sustainable location for development. Identifying growth in this area is in line with the Local Plan's strategy.</p> <p>Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by the relevant site-specific policies and Anglian Water. More detail on this proposal is set out in the representations provided by the promoter at Regulation 19, which also includes reference to improvements to the Brook Park pumping station. Furthermore, both site-specific policies include requirements for enhancements towards sewerage infrastructure which should be undertaken prior to first occupation in order to prevent detriment to the environment and comply with the Water Framework Directive obligations.</p> <p>Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability. Education capacity information is provided by the Education Authority and financial contributions will be considered through the application process in line with Developer contribution policy HC4.</p> <p>The site-specific policy for both sites include requirements for a Transport Assessment to be undertaken for both proposed allocations in Hoveton that identifies sustainable traffic mitigation measures that will alleviate the potential cumulative impacts on the road network. Mitigation</p>

	options already exist for highways issues in Colitshall as identified in Policy NW62/A and its supporting evidence, which can be found in the Local Plan's examination library.
Section	Proposed Change 5 - New Site Allocation: Land at Stalham Road, Hoveton (HV06/A)
ID	FC432
Response Date	19/12/2024 08:32:00
Full Name	Mrs Sarah Martin
Organisation	Parish Clerk Ashmanhaugh Parish Council
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Ashmanhaugh Parish Council's response to the consultation for a revised NNDC Local Plan December 2024:</p> <p>OBJECT</p> <p>For the following reasons:</p> <p>Ashmanhaugh Parish Council's response to the consultation for the revised NNDC Local Plan (December 2024) raises several concerns about proposed housing developments in Hoveton and their potential impact on the village's infrastructure and environment. And those of the surrounding Parishes.</p> <p>Key points include:</p> <ol style="list-style-type: none"> 1 Objections to Housing Increase: The Council opposes the proposed 25% increase in Hoveton's household numbers - prime agricultural land should not be used for development when grey-field sites are available. 2 Infrastructure Strain: There are existing infrastructure limitations, particularly in roads, sewage systems, schools, and the health centre. Further housing should not be approved until these issues are addressed, with necessary upgrades to schools and health services. 3 Environmental and Traffic Concerns: The Council points out that housing developments in Hoveton, which lies near the Broads National Park, would negatively affect the area's ecology and wildlife. <p>Traffic issues, including congestion and inadequate road infrastructure, are also major concerns, particularly with the A1151 road already at capacity including Wroxham bridge.</p> <p>The additional traffic and pollution caused by potential homeowners' vehicles is also something that needs to be considered, as it could be disastrous from both from a health and wildlife perspective.</p> <p>Dark skies for this and surrounding Parishes will also be affected.</p> <ol style="list-style-type: none"> 1 Flooding and Sewage Issues: The existing flooding problems, including surface water flooding and sewage overflow, are exacerbated by the proposed developments. The Belaugh Waste Water Treatment Plant's capacity is also a concern, as it is already nearing its technical limits. <p>In summary, Ashmanhaugh Parish Council is opposed to the proposed development plans in Hoveton, with concerns about overdevelopment, infrastructure strain, environmental impact, and a lack of adequate funding for necessary infrastructure improvements.</p> <p>Whilst the Parish Council understand the Governments need for increased housing further consideration should be given to other areas where all the above issues can be addressed and resolved.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	To ensure Ashmanhaugh Parish's comments are listened to and understood.
File (where submitted)	

Officer Summary	<p>Object: Objections to Housing Increase: The Council opposes the proposed 25% increase in Hoveton's household numbers - prime agricultural land should not be used for development when grey-field sites are available.</p> <p>Infrastructure Strain: There are existing infrastructure limitations, particularly in roads, sewage systems, schools, and the health centre. Further housing should not be approved until these issues are addressed, with necessary upgrades to schools and health services.</p> <p>Environmental and Traffic Concerns: The Council points out that housing developments in Hoveton, which lies near the Broads National Park, would negatively affect the area's ecology and wildlife.</p> <p>Traffic issues, including congestion and inadequate road infrastructure, are also major concerns, particularly with the A1151 road already at capacity including Wroxham bridge. The additional traffic and pollution caused by potential homeowners' vehicles is also something that needs to be considered, as it could be disastrous from both from a health and wildlife perspective. Dark skies for this and surrounding Parishes will also be affected.</p> <p>Flooding and Sewage Issues: The existing flooding problems, including surface water flooding and sewage overflow, are exacerbated by the proposed developments. The Belaugh Waste Water Treatment Plant's capacity is also a concern, as it is already nearing its technical limits.</p>
Officer Response	<p>Comments noted. Both sites are within Grade 2 agricultural land, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. Hoveton is identified as a Small Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 due to the provision of services and close connectivity to Wroxham's own services and facilities therefore, it is a sustainable location for development. Identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.</p> <p>Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability. The Council is keen to see investment in and the delivery of increased services and is a signatory of the Planning in Health Protocol. The protocol presents a process describing how relevant NHS organisations, Norfolk & Suffolk County Councils, Public Health and the Norfolk and East Suffolk Local Planning Authorities jointly engage to ensure that health considerations are adequately accounted for in plan making and in planning applications and their subsequent developments so that the appropriate authorities can plan and priorities investment(s).</p> <p>The site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan including, Policy ENV1 which ensures development proposals appropriately consider their impact on the Broads and the site-specific policy includes references to providing appropriate design that will integrate into the surrounding character.</p> <p>The site-specific policy for both sites include requirements for a Transport Assessment to be undertaken for both proposed allocations in Hoveton that identifies sustainable traffic mitigation measures that will alleviate the potential cumulative impacts on the road network. The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and no objection to development in this location was raised.</p> <p>Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by the relevant site-specific policies and Anglian Water. More detail on this proposal is set out in the representations provided by the promoter at Regulation 19, which also includes reference to improvements to the Brook Park pumping station. Furthermore, both site-specific policies include requirements for enhancements towards sewerage infrastructure which should be undertaken prior to first occupation in order to prevent detriment to the environment and comply with the Water Framework Directive obligations.</p>
Section	Proposed Change 5 - New Site Allocation: Land at Stalham Road, Hoveton (HV06/A)
ID	FC456
Response Date	19/12/2024 11:44:00
Full Name	Dr Jonathan Gould

Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>North Norfolk only had 1.5% population growth between 2011-2021. The population is 103,000 (Census 2021). This growth rate would project homes required for 1500 more people every ten years. Even for 20 years, this would be homes for 3,000 people, much less than the population growth of in excess of 8,000 people projected in the local plan. The local plan requirement for over 10,000 homes is a massive oversupply to what is needed.</p> <p>Hoveton is only a village of population 1,750 but it is being treated as a growth town alongside towns of populations 7,000 to 13,000. It does not have the infrastructure to support 20% population growth. Hoveton has already absorbed 16% population growth with the Brook Park development of 2014. Hoveton Village centre infrastructure already supports the Wroxham population and a large tourist industry which produces high pressure on services and infrastructure.</p> <p>There are infrastructure issues in Hoveton: Foul water drainage to Belaugh. Issues widely documented. Doctors surgery including appointments and staff Schools support the local population including the new Rackheath and Stalham developments and the new housing proposed for Tunstead in the small growth villages plan. Significantly increased surface water drainage requirements due to climate change. Hoveton and Wroxham already regularly flood in the autumn and winter. Wroxham Bridge and traffic. Wroxham already has traffic jams. There have already been new dwellings at Brook Park. The build quality issues are still being sorted out including surface water drainage issues. There have been many issues with the Victory Housing tenants. I do like the central green space at Brook Park.</p> <p>Listed Buildings and areas are affected detrimentally and significantly. St Peters Church and Hoveton Hall estate. In particular with HV01/C</p> <p>Site Modest expansion only at Hoveton. The current plans as stated above are excessive. A good builder is required. The work at Churchfields is much better than Brook Park which is poor. I like sheltered accommodation similar to in Stalham. But they are close to facilities. Bungalows are well suited to Hoveton. The Mallards development at Ash Drive, Martham is a good example. The site is a long way from village facilities for older people Tunstead Road and Two Saints Close are much lower density housing than the new proposals If the HV01/C site goes ahead in any form, a roundabout at Two Saints Drive with access to the new site would be recommended Surface water drainage must be considered. This appears to have been handled much better at Churchfields and at the Martham Mallards development than at Brook Park.</p> <p>Broads villages have particular access issues with bridges at Coltishall, Wroxham and Potter Heigham. The first two are old, small bridges which are already bottlenecks. Hoveton has a thriving tourism industry that would be damaged by congestion.</p> <p>There are many other areas in North Norfolk with better road access to develop housing in. Fixing quality issues with recent builds and suitable infrastructure should be a pre-requisite before building more. New housing needs to be the right housing, the right amount in the right place with the right infrastructure.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: North Norfolk only had 1.5% population growth between 2011-2021. The population is 103,000 (Census 2021). This growth rate would project homes required for 1500 more people every ten years. Even for 20 years, this would be homes for 3,000 people, much less than the population growth of in excess of 8,000 people projected in the local plan. The local plan requirement for over 10,000 homes is a massive oversupply to what is needed. It does not have the infrastructure to support 20% population growth. Hoveton has already absorbed 16% population growth with the Brook Park development of 2014.</p>

- Foul water drainage to Belaugh. Issues widely documented.
- Doctors surgery including appointments and staff
- Schools support the local population including the new Rackheath and Stalham developments and the new housing proposed for Tunstead in the small growth villages plan.
- Significantly increased surface water drainage requirements due to climate change. Hoveton and Wroxham already regularly flood in the autumn and winter.
- Wroxham Bridge and traffic. Wroxham already has traffic jams.

Listed Buildings and areas are affected detrimentally and significantly. St Peters Church and Hoveton Hall estate. In particular with HV01/C

Modest expansion only at Hoveton. The current plans as stated above are excessive. Surface water drainage must be considered. Broads villages have particular access issues with bridges at Coltishall, Wroxham and Potter Heigham. The first two are old, small bridges which are already bottlenecks. Hoveton has a thriving tourism industry that would be damaged by congestion.

The site is a long way from village facilities for older people Tunstead Road and Two Saints Close are much lower density housing than the new proposals. If the HV01/C site goes ahead in any form, a roundabout at Two Saints Drive with access to the new site would be recommended. Surface water drainage must be considered.

There are many other areas in North Norfolk with better road access to develop housing in. Fixing quality issues with recent builds and suitable infrastructure should be a pre-requisite before building more. New housing needs to be the right housing, the right amount in the right place with the right infrastructure.

Officer Response

Comments noted. The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the district's existing and future identified needs for all types of development. The Inspector's response to the Local Plan (July 2024 EH006(f)) states the submitted Plan has a shortfall of housing provision and the Council are seeking to provide additional allocations to help mitigate this shortfall and meet the revised objectively assessed needs. Hoveton is identified as a Small Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 due to the provision of services and close connectivity to Wroxham's own services and facilities therefore, it is a sustainable location for development. Identifying growth in this area is in line with the Local Plan's strategy.

Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by the relevant site-specific policies and Anglian Water. More detail on this proposal is set out in the representations provided by the promoter at Regulation 19, which also includes reference to improvements to the Brook Park pumping station. Furthermore, both site-specific policies include requirements for enhancements towards sewerage infrastructure which should be undertaken prior to first occupation in order to prevent detriment to the environment and comply with the Water Framework Directive obligations.

Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability. Education capacity information is provided by the Education Authority and financial contributions will be considered through the application process in line with Developer contribution policy HC4.

Appendix 2 of the Additional Sites Review Background Paper includes a Historic Impact Assessment for both sites in Hoveton which concluded that both sites may have some impact on the setting of St. Peter's Church to the north therefore, the site-specific policies include reference for the provision of a landscape buffer to the north to soften the boundary between the development and land to the north, whilst also providing mitigation against potential impacts on St. Peter's Church.

The site-specific policy for both sites include requirements for a Transport Assessment to be undertaken for both proposed allocations in Hoveton that identifies sustainable traffic mitigation measures that will alleviate the potential cumulative impacts on the road network. Mitigation options already exist for highways issues in Coltishall as identified in Policy NW62/A and its supporting evidence, which can be found in the Local Plan's examination library.

Section	Proposed Change 5 - New Site Allocation: Land at Stalham Road, Hoveton (HV06/A)
ID	FC479
Response Date	19/12/2024 10:11:00
Full Name	Cllr Nigel Dixon
Organisation	Ward Member for Hoveton & Tunstead (NNDC)

Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	Hoveton - the enlarged HVO1 and new HV06 sites - they must not proceed without the foul water pipeline to Belaugh, the uprating of the Belaugh WTC, an enhanced surface water drainage system which doesn't add to the surface water drainage problems in Grange Close Hoveton, uprating the traffic capacity of Hoveton village centre/river bridge and a roundabout access on Tunstead Rd at the junction with Two Saints Close. These are essential hard infrastructure improvements that are necessary to accommodate the proposed housing growth to avoid causing serious environmental, road safety and quality of life harm.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Hoveton - the enlarged HVO1 and new HV06 sites - they must not proceed without the foul water pipeline to Belaugh, the uprating of the Belaugh WTC, an enhanced surface water drainage system which doesn't add to the surface water drainage problems in Grange Close Hoveton, uprating the traffic capacity of Hoveton village centre/river bridge and a roundabout access on Tunstead Rd at the junction with Two Saints Close. These are essential hard infrastructure improvements that are necessary to accommodate the proposed housing growth to avoid causing serious environmental, road safety and quality of life harm.
Officer Response	Comments noted. The site is expected to comply with the requirements set out in both of the site-specific policies and all other relevant policies in the Local Plan. The Council will continue to engage with the site promoters to ensure the effective delivery of both sites in Hoveton.
Section	Proposed Change 5 - New Site Allocation: Land at Stalham Road, Hoveton (HV06/A)
ID	FC502
Response Date	18/12/2024 11:27:00
Full Name	Mr Keith Johnson
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILE
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	Revised NORTH NORFOLK LOCAL PLAN.docx
Officer Summary	<p>Object: Once the Brook Park Phase 1 (HVO1/a) development had been built the flooding on the estate increased in intensity and frequency. This was also accompanied by raw sewerage contamination in various locations on the Grange Close estate which had not occurred earlier. The cause of this increase in flooding and sewerage contamination could be because when we have the heavier rainfall the surface water drainage cannot cope with the excess water and some of it ends up in the sewers, foul water system, which is also taking the additional waste created by users on Brook Park Phase 1 (HVO1/a).</p> <p>It should also be noted that using the prime agricultural land to build upon will significantly reduce the capacity of the area to absorb and retain some of the water from rainfall. . Also HVO6/a is susceptible to surface water flooding and is often waterlogged showing that its at</p>

saturation point which already contributes to surface water accumulation's in the Stalham Road and Grange Close area. Also the hard surfaces created due to the construction of new houses will contribute to surface water runoff, especially on the HVO6a site, onto the Stalham Road area which is east of this site.

Hoveton Community Council have suggested alternative brown field sites for the building of the area's allocation of houses. These would be in a more suitable place to build and is nearer to Belaugh Sewerage treatment works! increased traffic due to holiday increases and also from the proposed developments in Tunstead, Stalham and Ludham areas of Norfolk.

Before any development is begun on HVO1/b or HVO1/c then a direct dedicated foul water/sewerage pipeline must be installed from the sites mentioned to the waste water treatment plant at Belaugh prior to building work begins. it is hard to see how the problems of safe access and water drainage problems and surface water accumulations can be overcome along with the traffic constraints and preserving Hoveton.

Finally all of the proposed development sites fall within the Broads National Park and within a site of Special Scientific Interest.

Officer Response

Comments noted. Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by the relevant site-specific policies and Anglian Water. More detail on this proposal is set out in the representations provided by the promoter at Regulation 19, which also includes reference to improvements to the Brook Park pumping station. Furthermore, both site-specific policies include requirements for enhancements towards sewerage infrastructure which should be undertaken prior to first occupation in order to prevent detriment to the environment and comply with the Water Framework Directive obligations.

Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (C4, Page 25). Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.

Both sites are within Grade 2 agricultural land, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. Hoveton is identified as a Small Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 due to the provision of services and close connectivity to Wroxham's own services and facilities therefore, it is a sustainable location for development. Identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.

The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and no objection to development in this location was raised.

The Council has a Brownfield Register, there are not enough sites on this register to accommodate the required growth needed as set out in Policy SS1 and many potential brownfield sites are unsuitable due to location or other constraints. There is no 'Grey' field land in North-Norfolk as this pertains to the Green Belt, which is not a present designation within Norfolk. There are no SSSI designations within either site or within the wider area and both sites are not within the Broads National Park, this area is covered by the Broads Authority Area however, the Local Plan includes Policy ENV1 which ensures development proposals appropriately consider their impact on this Broads.

Section	Proposed Change 5 - New Site Allocation: Land at Stalham Road, Hoveton (HV06/A)
ID	FC524
Response Date	19/12/2024 11:06:00
Full Name	Tessa Saunders
Organisation	Spatial & Strategic Planning Manager Anglian Water

Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILES</p> <p>Hoveton is within Belaugh WRC catchment which currently has dry weather flow headroom to accommodate the proposed growth from site HV01/C and HV06/A. Anglian Water notes that the identified site allocation is adjacent to site HV01/C, and therefore, there will be similar limitations regarding the foul drainage network as identified in para. 2.5.3.</p> <p>It is considered that additional growth in this location presents an opportunity for the developers to coordinate their foul drainage strategies for both sites and the delivery of the necessary infrastructure, in discussion with Anglian Water. Clauses 9 and 10 are supported - to ensure the foul drainage strategy and connection to Belaugh WRC is agreed with Anglian Water and delivered before occupancy of any dwelling on the site. We support the policy requirements in clauses 9 and 10 to ensure the foul drainage strategy and connection to Belaugh WRC is agreed with Anglian Water and delivered before occupancy of any dwelling on the site. We suggest that Clause 10 is amended to state:</p> <p>10. <i>Enhancement to Delivery of sewerage infrastructure required to accommodate wastewater flows from the development should be undertaken prior to the first occupation of any dwelling to prevent detriment to the environment and comply with Water Framework Directive obligations;</i></p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	<p>Anglian Water Response - Front Page 19.12.24.pdf Appendix 1 WRC Capacity and Dry Weather Flow.pdf</p>
Officer Summary	<p>Hoveton is within Belaugh WRC catchment which currently has dry weather flow headroom to accommodate the proposed growth from site HV01/C and HV06/A. Anglian Water notes that the identified site allocation is adjacent to site HV01/C, and therefore, there will be similar limitations regarding the foul drainage network as identified in para. 2.5.3.</p> <p>It is considered that additional growth in this location presents an opportunity for the developers to coordinate their foul drainage strategies for both sites and the delivery of the necessary infrastructure, in discussion with Anglian Water. Clauses 9 and 10 are supported - to ensure the foul drainage strategy and connection to Belaugh WRC is agreed with Anglian Water and delivered before occupancy of any dwelling on the site. We support the policy requirements in clauses 9 and 10 to ensure the foul drainage strategy and connection to Belaugh WRC is agreed with Anglian Water and delivered before occupancy of any dwelling on the site. We suggest that Clause 10 is amended to state:</p> <p><i>Enhancement to Delivery of sewerage infrastructure required to accommodate wastewater flows from the development should be undertaken prior to the first occupation of any dwelling to prevent detriment to the environment and comply with Water Framework Directive obligations;</i></p>
Officer Response	<p>Comments noted. Agree to consider modification and amend as necessary. See modification schedule. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.</p>
Section	Proposed Change 5 - New Site Allocation: Land at Stalham Road, Hoveton (HV06/A)
ID	FC535
Response Date	18/12/2024 15:03:00
Full Name	Caroline Jeffrey
Organisation	Principal Planner, Minerals and Waste Policy Norfolk County Council (Minerals & Waste)
Agent Full Name	
Agent Organisation	

<p>Does the Proposed Change contribute to the overall soundness of the Plan?</p>	<p>We are pleased to note that the following new or extended site allocations recognise the site is within a mineral safeguarding area, and include mineral safeguarding requirements within the following policies:</p> <ul style="list-style-type: none"> • Land West of Pine Tree Farm, Cromer (Policy C22/4) • Land East of Tunstead Road, Hoveton (Policy HV01/C) • Land at Brumstead Road, Stalham (Policy ST04/A) • Land Adjacent Ingham Road, Stalham (Policy ST19/B) • Land off Cromer Road & Church Lane, Mundesley (Policy MUN03/A) <p>The following site allocations are within a Minerals Safeguarding Area (sand and gravel), but this has not been included within the draft policy wording. Therefore, we object to these site allocation policies unless appropriate wording, regarding minerals safeguarding, is inserted into the following policies:</p> <ul style="list-style-type: none"> • Land at Stalham Road, Hoveton (Policy HV06/A) • Land at End of Mundesley Road, North Walsham (Policy NW16) • Land West of Langham Road, Blakeney (Policy BLA01/B) <p>The policy wording used in the North Norfolk Local Plan for other sites within Mineral Safeguarding Areas is currently: “The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - ‘safeguarding’ (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.”</p> <p>Due to the progress on the Norfolk Minerals and Waste Local Plan, which is planned for adoption in 2025 and would then replace the current Minerals and Waste Core Strategy, we advise updating the policy wording for all allocated sites in the North Norfolk Local Plan that are within a Mineral Safeguarding Areas to be worded as follows: <u>“This site is underlain by a defined Mineral Safeguarding Area for sand and gravel resource; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resource does not take place.”</u></p> <p>This wording is required to be inserted into the following policies HV06/A, NW16, BLA01/B and should also be used in policies C22/4, HV01/C, ST04/A, ST19/B and MUN03/A instead of the policy wording on mineral safeguarding used in the consultation document.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>The following site allocations are within a Minerals Safeguarding Area (sand and gravel), but this has not been included within the draft policy wording. Therefore, we object to these site allocation policies unless appropriate wording, regarding minerals safeguarding, is inserted into the following policies:</p> <ul style="list-style-type: none"> • Land at Stalham Road, Hoveton (Policy HV06/A) <p>The policy wording used in the North Norfolk Local Plan for other sites within Mineral Safeguarding Areas is currently: “The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - ‘safeguarding’ (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.”</p> <p>Due to the progress on the Norfolk Minerals and Waste Local Plan, which is planned for adoption in 2025 and would then replace the current Minerals and Waste Core Strategy, we advise updating the policy wording for all allocated sites in the North Norfolk Local Plan that are within a Mineral Safeguarding Areas to be worded as follows: <u>“This site is underlain by a defined Mineral Safeguarding Area for sand and gravel resource; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resource does not take place.”</u></p> <p>This wording is required to be inserted into the following policies HV06/A, NW16, BLA01/B and should also be used in policies C22/4, HV01/C, ST04/A, ST19/B and MUN03/A instead of the policy wording on mineral safeguarding used in the consultation document.</p>

Officer Response	Comments noted. Agree to consider modification and amend as necessary. See modification schedule.
Section	Proposed Change 5 - New Site Allocation: Land at Stalham Road, Hoveton (HV06/A)
ID	FC544
Response Date	18/12/2024 15:03:00
Full Name	Sarah Luff
Organisation	Norfolk County Council (Lead Local Flood Authority)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>The LLFA note that the sites that have been put forward as part of this review (referred to as Group A sites) are those sites which have been previously assessed through the Local Plan's Site Assessment Process and considered suitable for development but were not identified for allocation for reasons such as there being more sites than needed at the time for that specific settlement or, a different site in the same location provided better opportunities for community benefit.</p> <p>Please note that of the potential sites put forward as part of this consultation, a GIS shapefile has not been provided to the LLFA for one site (F05, Land between Holt and Greenway Lane, Fakenham) and as such this site has not been reviewed as part of this consultation. It is however noted that NNDC have since deemed this site unsuitable for inclusion.</p> <p>A comprehensive review of the remaining sites has been produced is attached, document title Appendix 2 FW2024_0840 – LLFA Response – Sites Review (Excel).</p> <p>Please note the LLFA's response is specific to surface water flood risk. No other sources of flood risk (including but not limited to fluvial and coastal flooding; flooding from artificial sources; groundwater flooding and sewer flooding) have been reviewed as part of this consultation.</p> <p>The following criteria have been used in our review, see appendix 2:</p> <p>Surface Water Flood Risk</p> <ul style="list-style-type: none"> • These have been reviewed for the 3.33%, 1.0% and 0.1% Annual Exceedance Probability (AEP) events for surface water flooding. • Where deemed necessary, site-specific comments have been provided. • Assessment of onsite flood risk is proportionate to the site size and the flood risk significance. <p>Reports of Internal and Anecdotal (inclusive of external) Flooding</p> <ul style="list-style-type: none"> • Reviewed with the LLFAs current flood records (which date back to 2011). • Onsite and flood records within 500m of the site boundary have been reported. • Please note all external flood records are deemed to be anecdotal. <p>Watercourses</p> <ul style="list-style-type: none"> • These have been reviewed and identified when onsite or within 100m proximity to the site boundary. • If a watercourse does not fall within the provided site boundaries (even if it is on the edge of the site boundary) this has been classed as offsite. • Watercourses have been defined (ordinary watercourse, main river etc) • We have not defined the ownership of the watercourses in this assessment. • We have not reviewed offline watercourses, blind ditches or pond features as part of this review. Further investigation will be needed to assess these features, their type and whether they are connected to the wider drainage network. • We have not defined whether the features are obstructed by housing or roads etc. <p>Surface and Foul Water Sewer Systems</p> <ul style="list-style-type: none"> • Reviewed against Anglian Water Services sewer mapping. • Both onsite and offsite surface water sewers with 100m of the site boundary have been reported. • We have not defined whether the features are obstructed by housing or roads etc. <p>Additional Information</p> <ul style="list-style-type: none"> • Source Protection Zones (SPZs) (If applicable) • Internal Drainage Boards (IDBs) (If applicable) <p>We have then reported:</p> <ol style="list-style-type: none"> 1. Would local flood risk/surface water drainage constraints be severe enough to prevent development of the site?

	<p>2. Recommendations ranging from standard information required at planning through to requiring review and potential removal if deemed appropriate.</p> <p>Where appropriate, we have provided additional site-specific comments. For ease of use, we have produced a traffic light system based on the recommendations column:</p> <ul style="list-style-type: none"> • Red - Recommend a review of the site and potential removal from the local plan. • Orange - Significant information required at the planning stage. • Green - Standard information required at the planning stage.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	Appendix 2 FW2024_0840 – LLFA Response – Sites Review (Excel).xlsx
Officer Summary	<p>A comprehensive review of the remaining sites has been produced is attached to this representation, document title Appendix 2 FW2024_0840. LLFA's response is specific to surface water flood risk. No other sources of flood risk (including but not limited to fluvial and coastal flooding; flooding from artificial sources; groundwater flooding and sewer flooding) have been reviewed as part of this consultation.</p> <p>The following criteria have been used in our review, see appendix 2:</p> <p>Surface Water Flood Risk</p> <ul style="list-style-type: none"> • These have been reviewed for the 3.33%, 1.0% and 0.1% Annual Exceedance Probability (AEP) events for surface water flooding. • Where deemed necessary, site-specific comments have been provided. • Assessment of onsite flood risk is proportionate to the site size and the flood risk significance. <p>Reports of Internal and Anecdotal (inclusive of external) Flooding</p> <ul style="list-style-type: none"> • Reviewed with the LLFAs current flood records (which date back to 2011). • Onsite and flood records within 500m of the site boundary have been reported. • Please note all external flood records are deemed to be anecdotal. <p>Watercourses</p> <ul style="list-style-type: none"> • These have been reviewed and identified when onsite or within 100m proximity to the site boundary. • If a watercourse does not fall within the provided site boundaries (even if it is on the edge of the site boundary) this has been classed as offsite. • Watercourses have been defined (ordinary watercourse, main river etc) • We have not defined the ownership of the watercourses in this assessment. • We have not reviewed offline watercourses, blind ditches or pond features as part of this review. Further investigation will be needed to assess these features, their type and whether they are connected to the wider drainage network. • We have not defined whether the features are obstructed by housing or roads etc. <p>Surface and Foul Water Sewer Systems</p> <ul style="list-style-type: none"> • Reviewed against Anglian Water Services sewer mapping. • Both onsite and offsite surface water sewers with 100m of the site boundary have been reported. • We have not defined whether the features are obstructed by housing or roads etc. <p>Additional Information</p> <ul style="list-style-type: none"> • Source Protection Zones (SPZs) (If applicable) • Internal Drainage Boards (IDBs) (If applicable) <p>We have then reported:</p> <ol style="list-style-type: none"> 1. Would local flood risk/surface water drainage constraints be severe enough to prevent development of the site? 2. Recommendations ranging from standard information required at planning through to requiring review and potential removal if deemed appropriate. <p>Where appropriate, we have provided additional site-specific comments. For ease of use, we have produced a traffic light system based on the recommendations column:</p> <ul style="list-style-type: none"> • Red - Recommend a review of the site and potential removal from the local plan. • Orange - Significant information required at the planning stage. • Green - Standard information required at the planning stage. <p>Summary of findings within attached document, Appendix 2:</p>

	The site was rated as Green in the RAG rating system and the standard information on surface water flooding will be required at the planning application stage.
Officer Response	Comments noted. The LLFA will also be consulted on as part of any future application on site. Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belough Water Recycling Centre as required by the relevant site-specific policies and Anglian Water. Furthermore, both site-specific policies include requirements for enhancements towards sewerage infrastructure which should be undertaken prior to first occupation in order to prevent detriment to the environment and comply with the Water Framework Directive obligations.
Section	Proposed Change 5 - New Site Allocation: Land at Stalham Road, Hoveton (HV06/A)
ID	FC564
Response Date	18/12/2024 15:03:00
Full Name	Richard Doleman
Organisation	Principle Infrastructure Development Planner Norfolk County Council (Highways)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	No objection to the proposed allocation policy.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	No objection to the proposed allocation policy.
Officer Response	Comments noted.
Section	Proposed Change 5 - New Site Allocation: Land at Stalham Road, Hoveton (HV06/A)
ID	FC579
Response Date	18/12/2024 15:03:00
Full Name	Paul Harker
Organisation	Place Planning Manager Norfolk County Council (Childrens Services)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	RAG Status = Amber Impact on School Estate/Transport Proximity/Capacity to develop schools: Its likely this development will add additional pressure onto the existing school from its local catchment, and could place pressure on the school. Primary and secondary provision sites on constrained sites and further assessment would be required to the implications of the next nearest schools. It will depend if this site comes forward in isolation or alongside site HV02/C as to whether the level of impact will be felt. Any contributions required to mitigate this development, if the site comes forward, would be sought in response to the planning application.
Do you consider it necessary to participate in a public hearing session, should these be required?	

If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	RAG Status = Amber Impact on School Estate/Transport Proximity/Capacity to develop schools: Its likely this development will add additional pressure onto the existing school from its local catchment, and could place pressure on the school. Primary and secondary provision sites on constrained sites and further assessment would be required to the implications of the next nearest schools. It will depend if this site comes forward in isolation or alongside site HV02/C as to whether the level of impact will be felt. Any contributions required to mitigate this development, if the site comes forward, would be sought in response to the planning application.
Officer Response	Comments noted. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.
Section	Proposed Change 5 - New Site Allocation: Land at Stalham Road, Hoveton (HV06/A)
ID	FC586
Response Date	19/12/2024 12:03:00
Full Name	Gemma Clark
Organisation	Higher Officer, Sustainable Development, Norfolk Coast and Marine Team Natural England
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILES Impacts to National landscapes Close to Broads National Landscape. Further advice on landscapes is in annex 3. A Landscape Strategy or Landscape Visual Impact Assessment (LVIA) will be required to help integrate development into the landscape and minimise visual impact. Nutrient neutrality The proposed site allocation lies within the River Bure Nutrient Neutrality catchment area. As such any planning application will need to be accompanied with a HRA informed by a Nutrient Neutrality budget calculation and mitigation strategy. The Additional Sites Review Background Paper (November 2024 page 29), states that offsite mitigation will be available by the purchase of credits. Further advice on credits is in Annex 5 BMV Agricultural land Loss of agricultural land. Not specified what grade. Further advice on soils is in Annex 2 . Recreational disturbance and other issues Contributions to GIRAMS included in the policy. Natural England would support Provision of a 3.0m wide pedestrian/cycleway along the full extent of the site frontage onto Stalham Road and provision of pedestrian/cycle connection to adjoining allocation.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	Natural England - Annex 2.pdf Natural England - Annex 3.pdf Natural England - Annex 5.pdf
Officer Summary	Close to Broads National Landscape. Further advice on landscapes is in annex 3. A Landscape Strategy or Landscape Visual Impact Assessment (LVIA) will be required to help integrate development into the landscape and minimise visual impact.

	<p>The proposed site allocation lies within the River Bure Nutrient Neutrality catchment area. As such any planning application will need to be accompanied with a HRA informed by a Nutrient Neutrality budget calculation and mitigation strategy. The Additional Sites Review Background Paper (November 2024 page 29), states that offsite mitigation will be available by the purchase of credits. Further advice on credits is in Annex 5</p> <p>Loss of agricultural land. Not specified what grade. Further advice on soils is in Annex 2.</p> <p>Contributions to GIRAMS included in the policy. Natural England would support Provision of a 3.0m wide pedestrian/cycleway along the full extent of the site frontage onto Stalham Road and provision of pedestrian/cycle connection to adjoining allocation.</p>
<p>Officer Response</p>	<p>The site is expected to comply with both the site-specific policy and all other relevant policies in the Local Plan including, Policy ENV1 which ensures development proposals appropriately consider their impact on the Broads and the site-specific policy includes references to providing appropriate design that will integrate into the surrounding character. An LVIA may be undertaken through the application process as expressed in Policy ENV2 of the Local Plan.</p> <p>The Council confirm that, through ongoing engagement with the site promoter, that mitigation will be provided for Nutrient Neutrality via the purchasing of credits. Both sites are within Grade 2 agricultural land, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. Hoveton is identified as a Small Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 due to the provision of services and close connectivity to Wroxham's own services and facilities therefore, it is a sustainable location for development. Identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.</p>

Proposed Change 6 - New Site Allocation: Land at Brumstead Road, Stalham (ST04)

Section	Proposed Change 6 - New Site Allocation: Land at Brumstead Road, Stalham (ST04)
ID	FC3
Response Date	08/11/2024 08:26:26
Full Name	Mr David Throup
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Further development of this magnitude will further overload the local amenities. The school is already "full", medical facilities stretched, and traffic obstructed during "rush hours and school opening and closing"</p> <p>A public meeting was hosted by representatives of the proposed developer attracted no support whatsoever and generated considerable hostility.</p> <p>Developing this land would eliminate the green buffer between Briston and Melton Constable.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: Further development of this magnitude will further overload the local amenities. The school is already "full", medical facilities stretched, and traffic obstructed during "rush hours and school opening and closing". Developing this land would eliminate the green buffer between Briston and Melton Constable.
Officer Response	Comments noted. There is no formal green buffer in this location. The two settlements have already coalesced visually and the site-specific policy includes a requirement to set the development back from Fakenham Road to reduce the site's potential impact on physical coalescence. The site lies entirely within the parish of Briston.
Section	Proposed Change 6 - New Site Allocation: Land at Brumstead Road, Stalham (ST04)
ID	FC106
Response Date	29/11/2024 11:09:54
Full Name	Mr Dennis Willis
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	No it is unsound. This change does not have a traffic plan. Additional traffic from this development will have additional affect on that using the roads and river crossing in Hoveton where I live.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: No traffic plan, Additional traffic from this development will have additional affect on that using the roads and river crossing in Hoveton.

Officer Response	Comments noted. Comments noted. The site-specific policy includes a requirement to undertake a Transport Assessment to assess whether off-site highway mitigation works are necessary. Specifically, consideration is required of traffic capacity at any junctions between the site and the A149.
Section	Proposed Change 6 - New Site Allocation: Land at Brumstead Road, Stalham (ST04)
ID	FC142
Response Date	04/12/2024 16:20:00
Full Name	J Simmons and B Wright
Organisation	
Agent Full Name	Rory Baker
Agent Organisation	Ceres Property
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILE
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	FC142 - 2024.12.04 Further Consultation Rep - ST04-A.pdf
Officer Summary	<p>Support: The Landowners are fully supportive of Proposed Change 6, which identifies Land at Brumstead Road as a new site allocation for residential development. This site represents a valuable opportunity to deliver sustainable housing, enhance the local character, and contribute positively to the objectives of the Local Plan. The Landowners commend the Council for recognizing the site's suitability and availability and offer their full commitment to its delivery.</p> <p>The description provided in paragraph 2.6.1 of the consultation report accurately captures the site's characteristics and context. The Landowners endorse this assessment and agree that it sets a strong foundation for the site's allocation. This accurate and factual description ensures transparency and demonstrates a clear understanding of the site's potential.</p> <p>The factors identified as "constraints" in paragraph 2.6.2 are better understood as "Site Considerations," reflecting the opportunities they present for delivering a high-quality, sustainable development. Reframing this section would align with the NPPF's emphasis on positively worded policies that support the delivery of sustainable growth and development.</p> <p>The mature hedgerow adjacent to Lyndford Road is a key landscape feature that can contribute significantly to the character of the development. The Landowners support its retention and enhancement, recognising its potential to integrate the new development with the existing community and to strengthen the sense of place. However, it is essential that these enhancements remain flexible and proportionate to ensure they do not hinder the delivery of sustainable housing. While Policy ST04-A already provides this flexibility, the Landowners recommend that paragraph 2.6.2 adopt consistent wording to ensure alignment throughout the Local Plan.</p> <p>The site's extension into open countryside presents an excellent opportunity to establish a carefully designed and landscaped boundary that will create a soft, attractive edge to the settlement. This approach will not only enhance the site's contribution to local character but also provide biodiversity and visual amenity benefits. Framing this as a design opportunity rather than a constraint underscores the site's ability to deliver a development that is both sensitive to its context and highly sustainable.</p> <p>While access onto Brumstead Road is identified as the preferred option, the Landowners recommend that the policy wording allows flexibility to explore the most sustainable and practical access solution during the planning application process. Alternative options, including access via Lyndford Road, may prove more suitable depending on detailed technical assessments. A positively worded policy could express a preference for Brumstead Road while allowing for alternative solutions where justified, ensuring the development is not unduly constrained by rigid access requirements.</p>

Paragraph 2.6.3 rightly identifies the site as suitable, available, and deliverable. The Landowners strongly support this conclusion and wish to emphasize their commitment to bringing the site forward promptly. The site's characteristics, including its manageable scale, lack of significant barriers to development, and proximity to existing infrastructure, ensure that delivery can occur early in the Plan period.

The Landowners are actively engaged and ready to advance this allocation into delivery stages, making it highly unlikely that the site would not come forward within the early years of the Plan period. This commitment aligns with the Council's strategic priorities for housing delivery and strengthens the Plan's effectiveness in meeting local housing need.

Policy:

Intro: It is beneficial that the wording of the development quantum allows for sufficient flexibility, ensuring that the site's potential for development can be fully realized, provided it meets the necessary sustainability and appropriateness criteria through the planning application process. Therefore, the inclusion of 45 dwellings as an indicative figure is supported. We would encourage the Council to introduce even greater flexibility, further enhancing the site's ability to make a positive contribution to local housing supply, by acknowledging the potential for more than 45 dwellings, where supported by evidence in the planning application.

Criterion 1: Whilst a convenient and safe vehicular access onto Brumstead Road is deliverable, the policy should install sufficient flexibility to ensure that should alternative means of access need to be explored and proposed as part of future planning applications the policy is not overly rigid in this regard. Included additional policy wording:

Provision of convenient and safe vehicular access onto Brumstead Road. Any proposed development that seeks to provide a vehicular access onto Lyndford Road in addition to / instead of onto Brumstead Road should be justified and appropriately evidenced through the planning application process.

Criterion 2: The Landowners are open to supporting off-site works to improve connectivity and accessibility, encouraging active and sustainable travel for both new and existing residents. These measures will need to be fully considered and justified through the planning application process and aligned with the NPPF tests for planning obligations.

Criterion 3: The Landowners recognize the potential benefit of additional pedestrian and cycle links to improve site connectivity. The specifics of such measures, including their alignment and scope, will need to be carefully considered through the planning application process and justified against the NPPF tests for planning obligations.

Criterion 4: The Landowners support the principle of retaining and enhancing existing hedgerows, acknowledging their contribution to the rural character and ecological value of the site. Any necessary adjustments to these features can be addressed as part of a detailed planning application to ensure a balanced approach between preservation and development.

Criterion 5: The Landowners agree with the importance of ensuring new development respects the site's edge[1]of-town setting. Key considerations such as building heights, materials, and landscaping will be carefully addressed through a detailed planning application to ensure an appropriate transition with the surrounding area.

Criterion 6: The Landowners recognize the importance of establishing a northern landscaped buffer to soften views. The exact extent and design of this buffer will need to be informed by the planning application process, ensuring it appropriately reflects the relationship between the proposed development and the existing landscape.

Criterion 7: The Landowners understand the importance of ensuring surface water run-off is managed to avoid increased flood risks. This will be fully addressed through a detailed planning application and supported by a comprehensive Surface Water Management Plan.

Criterion 8: The Landowners recognize the role of green infrastructure and open space in providing amenity for residents. The delivery of multi-functional open space, along with measures for its maintenance, can be addressed in detail through the planning application process to ensure it meets both local and site-specific needs.

Criterion 9: The Landowners acknowledge the importance of ensuring adequate foul drainage infrastructure is in place. A detailed Foul Drainage Strategy will be prepared and submitted as part of the planning application to address these requirements.

Criterion 10: The Landowners are prepared to address the necessary contributions toward the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS) through the planning application process.

Mineral Safeguarding: The Landowners note that the site is partly within a defined Mineral Safeguarding Area for sand and gravel. Any future planning application will include an assessment to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 (or any successor policy) to the satisfaction of the Mineral Planning Authority.

Overall, the Landowners strongly support and endorse the inclusion of Land at Brumstead Road, Stalham as a residential allocation within the NNLP as a sound and deliverable site for new housing to meet the district's need over the plan period.

The Landowner acknowledges and appreciates the Council's re-assessment of the site at Brumstead Road (Ref: ST04-A) and the recognition of its potential for residential development. The Council's assessment, which seeks to balance housing needs with the preservation of the rural character of Stalham, is welcomed. The Landowner shares the Council's objective of ensuring that development is appropriately integrated with the existing settlement and respects the surrounding environment.

While the Council has proposed a more limited development footprint, the Landowners believes that the full extent of the site is suitable, available, and deliverable for development. The Landowners is confident that the site has the capacity to deliver more than the 45 dwellings currently suggested, subject to further testing and refinement through the planning application process. The larger extent of the site offers greater flexibility to meet housing targets and deliver a more substantial contribution to the district's housing supply, particularly in the early years of the plan period.

The Landowners acknowledges the importance of protecting agricultural land and wishes to assure the Council that the development will not result in the loss of the best and most versatile agricultural land. To support this, the Landowner is prepared to undertake a site-specific Agricultural Land Classification (ALC) survey as part of the planning application process. This survey will provide the necessary evidence to demonstrate that the site can be developed sustainably, without significant impact on valuable agricultural resources.

The Landowners support the Council's proposal to enhance pedestrian infrastructure along Brumstead Road. Improving pedestrian movement, connectivity, and accessibility is important for integrating the site with the wider community.

The Landowners agrees with the Council's conclusion that the site is deliverable and capable of coming forward quickly. With its strong suitability and availability, the site is in a good position to contribute to housing delivery early in the plan period. The Landowner is keen to engage with the Council to progress the development and ensure it aligns with the broader objectives of the Local Plan.

In conclusion, the Landowners supports the Council's assessment of the site and its potential for development. The Landowners is confident that the full extent of the site can contribute positively to Stalham's housing supply while preserving the town's rural character. The Landowners looks forward to continuing to work with the Council to ensure the site's development is brought forward in a way that meets local needs and complies with all planning requirements.

The Landowners are committed to progressing this development through the planning application process and is ready to collaborate with the Council to bring the site forward as part of the Local Plan's housing strategy.

Representation also includes commentary on site assessment provided in Appendix 1 of the Additional Sites Background Paper.

Officer Response

Comments and support noted. The Council disagree with the proposed modifications for the following reasons:

- Access: The Council acknowledge the representations support for the retention and enhancement of the mature hedgerow adjacent to Lyndford Road, any access provision from Lyndford Road would be contrary to this position and the requirements set out in the Policy. Brumstead Road is a long, relatively straight road that runs along the entire boundary of the site, allowing for an appropriate amount of space to provide a suitable and well-designed access into the site. Lyndford Road is an existing access into a dense area of housing, access from this point may not be suitable and impact other requirements set out in the Policy. Therefore, The council do not agree to this proposed modification, opportunities to provide an additional access onto Lyndford Road for design purposes can be explored through the application process.

- Capacity: The number of dwellings provided within the policy is based on the Council's standard methodology for calculating capacity which is set out in the HELAA Assessment Methodology Paper (D13). The policy includes the term 'approximate' which allows for flexibility in the provision of dwellings at the application stage.

- Site Extent: the proposal to amend the site boundary to the full extent as assessed within the site assessment booklet is acknowledged however, the portion identified in the consultation is appropriate within the setting of the landscape, any increase size will not only extend further into the open landscape but also the site's relationship with the settlement will be reduced

Section

Proposed Change 6 - New Site Allocation: Land at Brumstead Road, Stalham (ST04)

ID

FC354

Response Date	19/12/2024 10:30:39
Full Name	Mr Christopher Yardley
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	The current assessment and policy for this site does not adequately address landscape impacts in relation to the wider damaging effects of the proposed development. The current proposals do not make sufficient provision for landscaping to the northern, and eastern sides of the site to screen and integrate development into the landscape. A buffer of woodland of at least 30m is the least that can be considered appropriate -and would have been a standard provision in the 1990s / early 2000s, but more recent developments have discarded this and the results are ugly, uncharacteristic of older settlement types and damaging to the wider environment. This will protect the landscape beyond the site which is part of an attractive rural location - typical of the wide open landscapes of the northern Broadland. This is a sensitive, open and attractive rural landscape which needs to be protected. This is not highlighted sufficiently in the policy. So many developments on the edge of settlements seem to simply abut up to the boundary with possibly a hedge between them and the open rural landscape beyond. This is out of character with the majority of older, organic development and until about 10 years ago, the better designed and landscaped new developments. Similarly large dwellings on the boundary are inappropriate. Too often large 'land mark' dwellings of three stories are placed on prominent positions around such developments - these are totally alien to any previous development styles and should be formally prevented
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	The current assessment and policy for this site does not adequately address landscape impacts in relation to the wider damaging effects of the proposed development. The current proposals do not make sufficient provision for landscaping to the northern, and eastern sides of the site to screen and integrate development into the landscape. A buffer of woodland of at least 30m is the least that can be considered appropriate. This is a sensitive, open and attractive rural landscape which needs to be protected. This is not highlighted sufficiently in the policy. So many developments on the edge of settlements seem to simply abut up to the boundary with possibly a hedge between them and the open rural landscape beyond. This is out of character with the majority of older, organic development and until about 10 years ago, the better designed and landscaped new developments. Similarly large dwellings on the boundary are inappropriate.
Officer Response	Comments noted. The site-specific includes requirements to provide landscape buffering along the northern and boundary and to retain existing mature trees and hedgerows, both of which will help soften the impact on adjacent dwellings and mitigate the wider views from the north of the site. The provision of a 30m buffer on the eastern boundary as well as the northern boundary would significantly impact the site's ability to deliver the required level of growth needed for the Local Plan and restrict the site's ability to create a high-quality designed development.
Section	Proposed Change 6 - New Site Allocation: Land at Brumstead Road, Stalham (ST04)
ID	FC367
Response Date	18/12/2024 06:51:00
Full Name	Doreen Joy
Organisation	Stalham Town Council
Agent Full Name	
Agent Organisation	

<p>Does the Proposed Change contribute to the overall soundness of the Plan?</p>	<p>Stalham Town Council recognises the need for more housing in North Norfolk and the benefits that this will bring to our community including growth of our local economy with the added support to businesses and increased council tax rates. The new allocations of housing in the parish are the most sensible options merging well with existing developments.</p> <p>The council would wish to see significant levels of affordable properties included within these developments and rented housing to be provided to support local families and residents in ensuring their housing needs are met sufficiently.</p> <p>Primary concerns over expanded levels of housing in Stalham centre around pre-existing infrastructure and whether it would be adequate with added demand, namely, schooling provision, local health services and highway infrastructure. We would want to see contributions from any future development under S106 arrangements to be used to mitigate against further pressure on our community infrastructure.</p> <p>The council is not averse to seeing more housing brought forward for local people but would wish to ensure the above listed concerns are considered alongside any future application which is brought before North Norfolk District Council.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>Partial Support: The new allocations of housing in the parish are the most sensible options merging well with existing developments. The council would wish to see significant levels of affordable properties included within these developments and rented housing to be provided.</p> <p>Primary concerns over expanded levels of housing in Stalham centre around pre-existing infrastructure and whether it would be adequate with added demand, namely, schooling provision, local health services and highway infrastructure. We would want to see contributions from any future development under S106 arrangements to be used to mitigate against further pressure on our community infrastructure.</p> <p>The council is not averse to seeing more housing brought forward for local people but would wish to ensure the above listed concerns are considered alongside any future application which is brought before North Norfolk District Council.</p>
<p>Officer Response</p>	<p>Comments noted. The site is expected to provide affordable housing in line with Policy HOU2 of the Local Plan. Stalham is identified as a Small Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision. Developer contributions and viability.</p>
<p>Section</p>	<p>Proposed Change 6 - New Site Allocation: Land at Brumstead Road, Stalham (ST04)</p>
<p>ID</p>	<p>FC484</p>
<p>Response Date</p>	<p>18/12/2024 19:22:00</p>
<p>Full Name</p>	<p>Cllrs Kevin & Matthew Bayes & Taylor</p>
<p>Organisation</p>	<p>Members for Stalham Ward (NNDC)</p>
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Does the Proposed Change contribute to the overall soundness of the Plan?</p>	<p>Stalham Town Council acknowledges the need for additional housing in North Norfolk and supports sensible, well-integrated development that meets local needs. However, the following priorities must be addressed:</p> <ul style="list-style-type: none"> • Affordable Housing: Future developments must include significant provision of affordable housing and rental properties to support local families and meet the needs of existing residents. • Infrastructure Capacity: Stalham's infrastructure, including education, healthcare, and transport, must be enhanced to cope with increased demand. Contributions secured through S106 agreements must be used to address these pressures.

	<ul style="list-style-type: none"> • Community Integration: New developments should be carefully planned to integrate well with existing areas, fostering a cohesive and sustainable community. <p>We stress the importance of balancing growth with maintaining the quality of life for existing residents while ensuring infrastructure can support the needs of a growing population.</p> <p>General Recommendations</p> <ol style="list-style-type: none"> 1 Infrastructure Improvements First: Development should only proceed where infrastructure—including flood defences, sewerage systems, and highways—can demonstrably support additional demand. 2 Environmental Sensitivity: Environmental constraints must be central to decision-making, particularly in areas like Catfield with unique and protected ecological features. Local Plan policies must align with recent environmental studies and legal rulings. 3 Community Involvement: Residents' concerns and the input of parish and town councils should be prioritised in decision-making to ensure development meets local needs and respects community character. <p>We urge North Norfolk District Council to carefully consider these points and work collaboratively with our communities to address these concerns effectively.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Stalham Town Council acknowledges the need for additional housing in North Norfolk and supports sensible, well-integrated development that meets local needs. However, the following priorities must be addressed:</p> <ul style="list-style-type: none"> • Affordable Housing: Future developments must include significant provision of affordable housing and rental properties to support local families and meet the needs of existing residents. • Infrastructure Capacity: Stalham's infrastructure, including education, healthcare, and transport, must be enhanced to cope with increased demand. Contributions secured through S106 agreements must be used to address these pressures. • Community Integration: New developments should be carefully planned to integrate well with existing areas, fostering a cohesive and sustainable community. <p>We stress the importance of balancing growth with maintaining the quality of life for existing residents while ensuring infrastructure can support the needs of a growing population.</p> <p>General Recommendations</p> <ol style="list-style-type: none"> 1 Infrastructure Improvements First: Development should only proceed where infrastructure—including flood defences, sewerage systems, and highways—can demonstrably support additional demand. 2 Environmental Sensitivity: Environmental constraints must be central to decision-making, particularly in areas like Catfield with unique and protected ecological features. Local Plan policies must align with recent environmental studies and legal rulings. 3 Community Involvement: Residents' concerns and the input of parish and town councils should be prioritised in decision-making to ensure development meets local needs and respects community character.
Officer Response	<p>Comments noted. The site will be expected to deliver affordable housing in line with the Policy HOU2. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability. The site will be expected to comply with the site-specific policy and the requirements included therein, and all relevant policies in the Local Plan, including Policy ENV8 - High Quality Design.</p> <p>Where the site-specific policy includes requirements relating to infrastructure and creation of technical studies to identify mitigation solutions if required, these will be done as part of the application process and delivered through this approach. The Local Plan is based on a significant amount of evidence across a range of topics ensuring the Plan is up to date with relevant information and local/national policies and guidance where relevant.</p>
Section	Proposed Change 6 - New Site Allocation: Land at Brumstead Road, Stalham (ST04)

ID	FC525
Response Date	19/12/2024 11:06:00
Full Name	Tessa Saunders
Organisation	Spatial & Strategic Planning Manager Anglian Water
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILES</p> <p>The site is adjacent to Stalham WRC catchment which currently has dry weather flow headroom to accommodate the proposed growth from this site.</p> <p>We agree with Clause 9 but suggest that it is reworded for clarity to state:</p> <p><i>The provision of a Foul Drainage Strategy setting out how additional foul flows will be accommodated within the foul sewerage network and delivered demonstrating that there is capacity available in the sewerage network and at the receiving water recycling centre to accommodate wastewater flows from the site prior to commencement of the development. Clear plans should be agreed for any necessary sewerage infrastructure improvements which will need to be confirmed at a project level HRA;</i></p> <p>The supporting text should explain that developers must undertake pre-planning engagement with Anglian Water at the earliest opportunity to assess infrastructure capacity, and any specific requirements that may be needed to deliver the proposed development, which may include sustainable points of connection to our water supply and wastewater networks to minimise impacts on existing communities and the environment.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	Anglian Water Response - Front Page 19.12.24.pdf Appendix 1 WRC Capacity and Dry Weather Flow.pdf
Officer Summary	<p>The site is adjacent to Stalham WRC catchment which currently has dry weather flow headroom to accommodate the proposed growth from this site.</p> <p>We agree with Clause 9 but suggest that it is reworded for clarity to state:</p> <p><i>The provision of a Foul Drainage Strategy setting out how additional foul flows will be accommodated within the foul sewerage network and delivered demonstrating that there is capacity available in the sewerage network and at the receiving water recycling centre to accommodate wastewater flows from the site prior to commencement of the development. Clear plans should be agreed for any necessary sewerage infrastructure improvements which will need to be confirmed at a project level HRA;</i></p> <p>The supporting text should explain that developers must undertake pre-planning engagement with Anglian Water at the earliest opportunity to assess infrastructure capacity, and any specific requirements that may be needed to deliver the proposed development, which may include sustainable points of connection to our water supply and wastewater networks to minimise impacts on existing communities and the environment.</p>
Officer Response	Comments noted. Agree to consider modification and amend as necessary. See modification schedule. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.
Section	Proposed Change 6 - New Site Allocation: Land at Brumstead Road, Stalham (ST04)
ID	FC537
Response Date	18/12/2024 15:03:00
Full Name	Caroline Jeffrey
Organisation	Principal Planner, Minerals and Waste Policy Norfolk County Council (Minerals & Waste)

Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>We are pleased to note that the following new or extended site allocations recognise the site is within a mineral safeguarding area, and include mineral safeguarding requirements within the following policies:</p> <ul style="list-style-type: none"> • Land West of Pine Tree Farm, Cromer (Policy C22/4) • Land East of Tunstead Road, Hoveton (Policy HV01/C) • Land at Brumstead Road, Stalham (Policy ST04/A) • Land Adjacent Ingham Road, Stalham (Policy ST19/B) • Land off Cromer Road & Church Lane, Mundesley (Policy MUN03/A) <p>The following site allocations are within a Minerals Safeguarding Area (sand and gravel), but this has not been included within the draft policy wording. Therefore, we object to these site allocation policies unless appropriate wording, regarding minerals safeguarding, is inserted into the following policies:</p> <ul style="list-style-type: none"> • Land at Stalham Road, Hoveton (Policy HV06/A) • Land at End of Mundesley Road, North Walsham (Policy NW16) • Land West of Langham Road, Blakeney (Policy BLA01/B) <p>The policy wording used in the North Norfolk Local Plan for other sites within Mineral Safeguarding Areas is currently: “The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - ‘safeguarding’ (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.”</p> <p>Due to the progress on the Norfolk Minerals and Waste Local Plan, which is planned for adoption in 2025 and would then replace the current Minerals and Waste Core Strategy, we advise updating the policy wording for all allocated sites in the North Norfolk Local Plan that are within a Mineral Safeguarding Areas to be worded as follows: <i>“This site is underlain by a defined Mineral Safeguarding Area for sand and gravel resource; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resource does not take place.”</i></p> <p>This wording is required to be inserted into the following policies HV06/A, NW16, BLA01/B and should also be used in policies C22/4, HV01/C, ST04/A, ST19/B and MUN03/A instead of the policy wording on mineral safeguarding used in the consultation document.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>We are pleased to note that the following new or extended site allocations recognise the site is within a mineral safeguarding area, and include mineral safeguarding requirements within the following policies:</p> <ul style="list-style-type: none"> • Land at Brumstead Road, Stalham (Policy ST04/A) <p>The policy wording used in the North Norfolk Local Plan for other sites within Mineral Safeguarding Areas is currently: “The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - ‘safeguarding’ (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.”</p> <p>Due to the progress on the Norfolk Minerals and Waste Local Plan, which is planned for adoption in 2025 and would then replace the current Minerals and Waste Core Strategy, we advise updating the policy wording for all allocated sites in the North Norfolk Local Plan that are within a Mineral Safeguarding Areas to be worded as follows: <i>“This site is underlain by a defined Mineral Safeguarding Area for sand and gravel resource; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resource does not take place.”</i></p>

	This wording is required to be inserted into the following policies HV06/A, NW16, BLA01/B and should also be used in policies C22/4, HV01/C, ST04/A, ST19/B and MUN03/A instead of the policy wording on mineral safeguarding used in the consultation document.
Officer Response	Comments noted. Agree to consider modification and amend as necessary. See modification schedule.
Section	Proposed Change 6 - New Site Allocation: Land at Brumstead Road, Stalham (ST04)
ID	FC545
Response Date	18/12/2024 15:03:00
Full Name	Sarah Luff
Organisation	Norfolk County Council (Lead Local Flood Authority)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>The LLFA note that the sites that have been put forward as part of this review (referred to as Group A sites) are those sites which have been previously assessed through the Local Plan's Site Assessment Process and considered suitable for development but were not identified for allocation for reasons such as there being more sites than needed at the time for that specific settlement or, a different site in the same location provided better opportunities for community benefit.</p> <p>Please note that of the potential sites put forward as part of this consultation, a GIS shapefile has not been provided to the LLFA for one site (F05, Land between Holt and Greenway Lane, Fakenham) and as such this site has not been reviewed as part of this consultation. It is however noted that NNDC have since deemed this site unsuitable for inclusion.</p> <p>A comprehensive review of the remaining sites has been produced is attached, document title Appendix 2 FW2024_0840 – LLFA Response – Sites Review (Excel).</p> <p>Please note the LLFA's response is specific to surface water flood risk. No other sources of flood risk (including but not limited to fluvial and coastal flooding; flooding from artificial sources; groundwater flooding and sewer flooding) have been reviewed as part of this consultation.</p> <p>The following criteria have been used in our review, see appendix 2:</p> <p>Surface Water Flood Risk</p> <ul style="list-style-type: none"> • These have been reviewed for the 3.33%, 1.0% and 0.1% Annual Exceedance Probability (AEP) events for surface water flooding. • Where deemed necessary, site-specific comments have been provided. • Assessment of onsite flood risk is proportionate to the site size and the flood risk significance. <p>Reports of Internal and Anecdotal (inclusive of external) Flooding</p> <ul style="list-style-type: none"> • Reviewed with the LLFAs current flood records (which date back to 2011). • Onsite and flood records within 500m of the site boundary have been reported. • Please note all external flood records are deemed to be anecdotal. <p>Watercourses</p> <ul style="list-style-type: none"> • These have been reviewed and identified when onsite or within 100m proximity to the site boundary. • If a watercourse does not fall within the provided site boundaries (even if it is on the edge of the site boundary) this has been classed as offsite. • Watercourses have been defined (ordinary watercourse, main river etc) • We have not defined the ownership of the watercourses in this assessment. • We have not reviewed offline watercourses, blind ditches or pond features as part of this review. Further investigation will be needed to assess these features, their type and whether they are connected to the wider drainage network. • We have not defined whether the features are obstructed by housing or roads etc. <p>Surface and Foul Water Sewer Systems</p> <ul style="list-style-type: none"> • Reviewed against Anglian Water Services sewer mapping. • Both onsite and offsite surface water sewers with 100m of the site boundary have been reported. • We have not defined whether the features are obstructed by housing or roads etc. <p>Additional Information</p> <ul style="list-style-type: none"> • Source Protection Zones (SPZs) (If applicable) • Internal Drainage Boards (IDBs) (If applicable)

	<p>We have then reported:</p> <ol style="list-style-type: none"> 1. Would local flood risk/surface water drainage constraints be severe enough to prevent development of the site? 2. Recommendations ranging from standard information required at planning through to requiring review and potential removal if deemed appropriate. <p>Where appropriate, we have provided additional site-specific comments. For ease of use, we have produced a traffic light system based on the recommendations column:</p> <ul style="list-style-type: none"> • Red - Recommend a review of the site and potential removal from the local plan. • Orange - Significant information required at the planning stage. • Green - Standard information required at the planning stage.
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	<p>Appendix 2 FW2024_0840 – LLFA Response – Sites Review (Excel).xlsx</p>
<p>Officer Summary</p>	<p>A comprehensive review of the remaining sites has been produced is attached to this representation, document title Appendix 2 FW2024_0840. LLFA’s response is specific to surface water flood risk. No other sources of flood risk (including but not limited to fluvial and coastal flooding; flooding from artificial sources; groundwater flooding and sewer flooding) have been reviewed as part of this consultation.</p> <p>The following criteria have been used in our review, see appendix 2:</p> <p>Surface Water Flood Risk</p> <ul style="list-style-type: none"> • These have been reviewed for the 3.33%, 1.0% and 0.1% Annual Exceedance Probability (AEP) events for surface water flooding. • Where deemed necessary, site-specific comments have been provided. • Assessment of onsite flood risk is proportionate to the site size and the flood risk significance. <p>Reports of Internal and Anecdotal (inclusive of external) Flooding</p> <ul style="list-style-type: none"> • Reviewed with the LLFAs current flood records (which date back to 2011). • Onsite and flood records within 500m of the site boundary have been reported. • Please note all external flood records are deemed to be anecdotal. <p>Watercourses</p> <ul style="list-style-type: none"> • These have been reviewed and identified when onsite or within 100m proximity to the site boundary. • If a watercourse does not fall within the provided site boundaries (even if it is on the edge of the site boundary) this has been classed as offsite. • Watercourses have been defined (ordinary watercourse, main river etc) • We have not defined the ownership of the watercourses in this assessment. • We have not reviewed offline watercourses, blind ditches or pond features as part of this review. Further investigation will be needed to assess these features, their type and whether they are connected to the wider drainage network. • We have not defined whether the features are obstructed by housing or roads etc. <p>Surface and Foul Water Sewer Systems</p> <ul style="list-style-type: none"> • Reviewed against Anglian Water Services sewer mapping. • Both onsite and offsite surface water sewers with 100m of the site boundary have been reported. • We have not defined whether the features are obstructed by housing or roads etc. <p>Additional Information</p> <ul style="list-style-type: none"> • Source Protection Zones (SPZs) (If applicable) • Internal Drainage Boards (IDBs) (If applicable) <p>We have then reported:</p> <ol style="list-style-type: none"> 1. Would local flood risk/surface water drainage constraints be severe enough to prevent development of the site? 2. Recommendations ranging from standard information required at planning through to requiring review and potential removal if deemed appropriate. <p>Where appropriate, we have provided additional site-specific comments. For ease of use, we have produced a traffic light system based on the recommendations column:</p> <ul style="list-style-type: none"> • Red - Recommend a review of the site and potential removal from the local plan. • Orange - Significant information required at the planning stage. • Green - Standard information required at the planning stage.

	Summary of findings within attached document, Appendix 2: There is no assessment relating to the proposed new site, ST04.
Officer Response	Comments noted. The site-specific policy includes the requirement for a Foul Drainage Strategy setting how additional foul flows will be accommodated within the foul sewerage network prior to the commencement of development clear plans should be agreed for any necessary sewerage infrastructure improvements which will need to be confirmed at a project level HRA. The LLFA will also be consulted on as part of any future application on site.
Section	Proposed Change 6 - New Site Allocation: Land at Brumstead Road, Stalham (ST04)
ID	FC563
Response Date	18/12/2024 15:03:00
Full Name	Richard Doleman
Organisation	Principle Infrastructure Development Planner Norfolk County Council (Highways)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	No objection to the proposed allocation policy.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	No objection to the proposed allocation policy.
Officer Response	Comments noted.
Section	Proposed Change 6 - New Site Allocation: Land at Brumstead Road, Stalham (ST04)
ID	FC574
Response Date	18/12/2024 15:03:00
Full Name	Paul Harker
Organisation	Place Planning Manager Norfolk County Council (Childrens Services)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	RAG Status = Green Impact on School Estate/Transport Proximity/Capacity to develop schools: If this site comes forward along with a new site at ST19/B Land adjacent to Ingham Road, Stalham. Taken together the number of dwellings becomes 195 the total number of dwellings will be greater due to other potential allocations. This will put pressure on the Infant School currently though we expect in time this demand could be met by the existing school. Both the infant and junior operate from a single site and the sites are within reasonable walking distance of the local schools.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	

File (where submitted)	
Officer Summary	RAG Status = Green Impact on School Estate/Transport Proximity/Capacity to develop schools: If this site comes forward along with a new site at ST19/B Land adjacent to Ingham Road, Stalham. Taken together the number of dwellings becomes 195 the total number of dwellings will be greater due to other potential allocations. This will put pressure on the Infant School currently though we expect in time this demand could be met by the existing school. Both the infant and junior operate from a single site and the sites are within reasonable walking distance of the local schools.
Officer Response	Comments noted. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.
Section	Proposed Change 6 - New Site Allocation: Land at Brumstead Road, Stalham (ST04)
ID	FC587
Response Date	19/12/2024 12:03:00
Full Name	Gemma Clark
Organisation	Higher Officer, Sustainable Development, Norfolk Coast and Marine Team Natural England
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILES Impacts to National landscapes Close to Broads National Park. Further advice on landscapes is in Annex 3 . A Landscape Strategy or Landscape Visual Impact Assessment (LVIA) will be required to help integrate development into the landscape and Nutrient neutrality Stalham lies in the Ant Broads and Marshes Nutrient Neutrality catchment area. As such any planning application will need to be accompanied with a HRA informed by a Nutrient Neutrality budget calculation and mitigation strategy. Mitigation via the purchasing of credits has been suggested. Further advice on credits is in Annex 5 BMV Agricultural land Loss of agricultural land. Not specified what grade. Further advice on soils is in Annex 2 . Recreational disturbance and other issues Contributions to GIRAMS included in the policy The Additional Sites Review Background Paper page 23, states that the site was previously discounted from further consideration. Development on the site would extend into the open countryside and includes a larger area of high-grade agricultural land. Natural England welcomes the enhancement of the existing hedgerows and mature trees as well as the delivery of multifunctional green space. Provision of a buffer north of the site may help to soften the views
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	Natural England - Annex 5.pdf Natural England - Annex 2.pdf Natural England - Annex 3.pdf
Officer Summary	See response to FC588
Officer Response	See response to FC588

Proposed Change 7 - Extended Site Allocation: Land Adjacent to Ingham Road, Stalham (ST19/B)

Section	Proposed Change 7 - Extended Site Allocation: Land Adjacent to Ingham Road, Stalham (ST19/B)
ID	FC100
Response Date	25/11/2024 15:18:00
Full Name	Ms Eleanor Roberts
Organisation	Senior Sustainable Development Officer Water Management Alliance
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Thank you for consulting the Water Management Alliance on the North Norfolk Proposed Submission Version (Regulation 19 Publication) Local Plan. The Parishes included in the Housing Allocation Plan have some lands located within the boundary of the Internal Drainage District (IDD) of the Broads (2006) Internal Drainage Board (IDB) and Norfolk Rivers Internal Drainage Board (IDB). The Board's Byelaws therefore apply to those lands.</p> <p>A copy of the Board's Byelaws for The Broads IDB can be accessed on our website (https://www.wlma.org.uk/uploads/BIDB_Byelaws.pdf), along with maps of the IDD (https://www.wlma.org.uk/uploads/84-BIDB_drainindex.pdf). A copy of the Board's Byelaws for Norfolk Rivers IDB can be accessed on our website (https://www.wlma.org.uk/uploads/NRIDB_Byelaws.pdf), along with maps of the IDD (https://www.wlma.org.uk/uploads/179-NRIDB_Index.pdf).</p> <p>In keeping with other WMA member Boards, the principal function of the Broads (2006) IDB and Norfolk Rivers IDB is to provide flood protection within the Board's area. Certain watercourses within the IDD have been designated as 'Adopted Watercourses' by the Board. The adoption of a watercourse is an acknowledgement by the Board that the watercourse is of arterial importance to the IDD and as such, will normally receive maintenance from the IDD.</p> <p>For clarity, Main Rivers within each IDB are regulated by the Environment Agency.</p> <p>The Board's rationale and approach towards managing flood risk and water levels within the IDD is set out in the WMA Group's Planning and Byelaw Strategy document (https://www.wlma.org.uk/uploads/WMA_Planning_and_Byelaw_Policy.pdf). The Board will comment on planning for all major developments (10 or more properties) within the IDD watershed that are likely to discharge surface water into a watercourse within the IDD. Under certain circumstances, some major developments outside the IDD boundary may also be regulated by the Board's byelaws. We request that the Board is consulted as any planning application comes forward relating to any of the identified allocation sites.</p> <p>In order to reduce potential conflict between the planning process and the Board's regulatory regime and consenting process please be aware of the points set out below.</p> <p>Sites within WMA Board IDD</p> <ul style="list-style-type: none"> F10 Fakenham, Land South of Barons Close <p>This allocation site is partially within the Norfolk Rivers IDD, and I note the presence of a Board Adopted watercourse (DRN093G0101 – MN51 Fakenham) adjacent to the southern site boundary, as well as riparian watercourses to the east and west. For any future proposals at this site, please be aware of the following:</p> <ul style="list-style-type: none"> •Surface water disposal from new developments should be in line with the drainage hierarchy (as per best practice). •If surface water is proposed to be disposed of via infiltration, we would recommend that the proposed strategy is supported by ground investigation to determine the infiltration potential of the site and the depth to groundwater. If on-site material were to be considered favourable then we would advise infiltration testing in line with BREDigest 365 (or equivalent) to be undertaken to determine its efficiency. •If a surface water discharge is proposed to a watercourse, the proposed development will require land drainage consent in line with the Board's byelaws (specifically byelaw3). Any consent granted will likely be conditional, pending the payment of a Surface Water Development Contribution fee, calculated in line with the Board's charging policy(https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf). •The discharge of treated foul water to a watercourse within the IDD requires land drainage consent in line with the Board's byelaws (specifically byelaw 3). •Any works within 9 metres of a Board adopted watercourse will require consent to relax Byelaw 10 (no obstructions within 9 metres of the edge of drainage or flood risk management infrastructure).

- If development proposals involve works to alter a Board Adopted watercourse, consent is required under Section 23 of the Land Drainage Act 1991 (and byelaw 4).
- Should any development proposals include works to alter a riparian watercourse (including culverting for access), consent will be required under Section 23 of the Land Drainage Act 1991 (and byelaw 4). The Board is responsible for consenting this activity within the IDD, while Norfolk County Council (the Lead Local Flood Authority) is the regulatory body outside the boundary of the IDD.

Sites outside WMA Board IDD with potential to negatively impact the IDD

- C22/2, Cromer, Land West of Pine Tree Farm
- F01/B, Fakenham, Land North of Rudham Stile Lane
- F02, Fakenham, Land Adjacent Petrol Filling Station
- F03, Fakenham, Land at Junction of A148 & B1146
- LUD01/A, Ludham, Land South of School Road
- NW01/B, North Walsham, Land at Norwich Road & Nursery Drive
- NW62/A, North Walsham, Land West of North Walsham
- E7, Tattersett, Tattersett Business Park

The above sites lie outside the Norfolk Rivers IDB's IDD, however have the potential to significantly impact the Board's district should a surface water discharge be proposed. We recommend that as each of these sites prepares to apply for planning permission, they ensure their drainage proposals are designed in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4 and with the input of the IDB. It is possible that consent will be required from the Board for surface water discharge from these sites. It is likely that significant improvement works will be required in the receiving catchments of these developments in order to accept resultant additional flows downstream, for the purpose of reducing flood risk upstream and we would welcome discussion as early as possible to come to any necessary agreements to reduce flood risk in both the Board's IDD downstream and new development upstream.

At this stage our advice for surface water drainage design is as follows:

- Surface water disposal from new developments should be in line with the drainage hierarchy (as per best practice).
- We recommend that a drainage strategy is supplied which has been considered in line with the Planning Practice Guidance SuDS discharge location hierarchy.
- If it is proposed that a site disposes of surface water via infiltration, we recommend that the viability of this proposal is evidenced by ground investigation followed by infiltration testing in line with BRE Digest 365.
- If a surface water discharge is proposed to a watercourse within the watershed catchment of the Board's IDD then we request that this be in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible.
- Should any development proposals include works to alter a riparian watercourse (including culverting for access), consent will be required under Section 23 of the Land Drainage Act 1991. The Board is responsible for consenting this activity within the IDD, while Norfolk County Council (the Lead Local Flood Authority) is the regulatory body outside the boundary of the IDD.

Sites outside WMA Board IDD less likely to negatively impact the IDD

- BLA04/A, Blakeney, Land East of Langham Road
- BRI01, Briston, Land East of Astley Primary School
- BRI02, Briston, Land West of Astley Primary School
- C07/2, Cromer, Land at Cromer High Station
- C16, Cromer, Former Golf Practice Ground, Overstrand Road
- H17, Holt, Land North of Valley Lane
- H20, Holt, Land at Heath Farm
- H27/1, Holt, Land at Heath Farm
- HV01/B*, Hoveton, Land East of Tunstead Road
- LUD06/A, Ludham, Land at Eastern End of Grange Road
- NW52, North Walsham, Land East of Bradfield Road
- MUN03/B, Mundesley, Land off Cromer Road & Church Lane
- SH04, Sheringham, Land Adjoining Seaview Crescent
- SH07, Sheringham, Former Allotments, Weybourne Road, Adjacent to 'The Reef'
- SH18/1B, Sheringham, Land South of Butts Lane
- ST19/A*, Stalham, Land Adjacent Ingham Road
- ST23/2*, Stalham, Land North of Yarmouth Road, East of Broadbeach Gardens
- W01/1, Wells-next-the-Sea, Land South of Ashburton Close
- W07/1, Wells-next-the-Sea, Land Adjacent Holkham Road

*We would expect to see successful infiltration in this location as per other recent local developments.

	<p>For the above sites, we have no initial concerns, however as stated above we would request that the WMA is consulted on any forthcoming planning applications at these sites. Our standing advice at this stage is as follows:</p> <ul style="list-style-type: none"> • Surface water disposal from new developments should be in line with the drainage hierarchy (as per best practice). • We recommend that a drainage strategy is supplied which has been considered in line with the Planning Practice Guidance SuDS discharge location hierarchy. • If it is proposed that a site disposes of surface water via infiltration, we recommend that the viability of this proposal is evidenced by ground investigation followed by infiltration testing in line with BRE Digest 365. • If a surface water discharge is proposed to a watercourse within the watershed catchment of the Board's IDD then we request that this be in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible. • Should any development proposals include works to alter a riparian watercourse (including culverting for access), consent will be required under Section 23 of the Land Drainage Act 1991. The Board is responsible for consenting this activity within the IDD, while Norfolk County Council (the Lead Local Flood Authority) is the regulatory body outside the boundary of the IDD. <p>Whilst the consenting process as set out under the Land Drainage Act 1991 and the aforementioned Byelaws are separate from planning, the ability to implement a planning permission may be dependent on the granting of these consents. As such we strongly recommend that developers seek the necessary consent prior to determination of a planning application. The Board's officers are available to respond to queries and provide advice.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	site ST19/B is included in the table as a 'Sites outside WMA Board IDD less likely to negatively impact the IDD '.
Officer Response	Note: This response is an identical repeat of the WMA Reg 19 response with the exception that site ST19/B is included in the table as a 'Sites outside WMA Board IDD less likely to negatively impact the IDD '. Comments noted. No changes to policy required.
Section	Proposed Change 7 - Extended Site Allocation: Land Adjacent to Ingham Road, Stalham (ST19/B)
ID	FC107
Response Date	29/11/2024 11:12:54
Full Name	Mr Dennis Willis
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	No. This change does not have a traffic plan. The additional traffic arising from this development will have further significant impact on the road and river crossing in Hoveton where I live.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	

File (where submitted)	
Officer Summary	Object: No traffic plan, Additional traffic from this development will have additional affect on that using the roads and river crossing in Hoveton.
Officer Response	Comments noted. The site-specific policy includes a requirement to undertake a Transport Assessment to assess whether off-site highway mitigation works are necessary. Specifically, consideration is required of traffic capacity at any junctions between the site and the A149.
Section	Proposed Change 7 - Extended Site Allocation: Land Adjacent to Ingham Road, Stalham (ST19/B)
ID	FC443
Response Date	19/12/2024 10:31:17
Full Name	Mr Christopher Yardley
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	The proposeals do not make sufficient provision for landscaping to the northern and eastern boundaries which are onto open countryside. These will require significant provision of tree planting belts to screen and integrate the development into the landscape and prevent the development appearing (as so many recent developments do - in contrast to those done some years ago when landscape impact was taken more seriously and landscape impacts were better addressed). A belt of at least 30m in width around the boundaries is required to softn / screen and integrate the development into the wider landscape and prevent it appearing as a stark, dominant, uncharacteristic feature
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: The proposeals do not make sufficient provision for landscaping to the northern and eastern boundaries which are onto open countryside. These will require significant provision of tree planting belts to screen and integrate the development into the landscape and prevent the development appearing (as so many recent developments do - in contrast to those done some years ago when landscape impact was taken more seriously and landscape impacts were better addressed). A belt of at least 30m in width around the boundaries is required to softn / screen and integrate the development into the wider landscape and prevent it appearing as a stark, dominant, uncharacteristic feature
Officer Response	Comments noted. The site-specific includes requirements to provide landscape buffering along the northern and south-eastern boundary and to retain existing mature trees, both of which will help soften the impact on adjacent dwellings and mitigate the wider views from the north and south-east of the site. The provision of a 30m belt around all boundaries would significantly impact the site's ability to deliver the required level of growth needed for the Local Plan and restrict the site's ability to create a high-quality designed development.
Section	Proposed Change 7 - Extended Site Allocation: Land Adjacent to Ingham Road, Stalham (ST19/B)
ID	FC485
Response Date	18/12/2024 19:22:00
Full Name	Cllrs Kevin & Matthew Bayes & Taylor
Organisation	Members for Stalham Ward (NNDC)
Agent Full Name	
Agent Organisation	

<p>Does the Proposed Change contribute to the overall soundness of the Plan?</p>	<p>Stalham Town Council acknowledges the need for additional housing in North Norfolk and supports sensible, well-integrated development that meets local needs. However, the following priorities must be addressed:</p> <ul style="list-style-type: none"> • Affordable Housing: Future developments must include significant provision of affordable housing and rental properties to support local families and meet the needs of existing residents. • Infrastructure Capacity: Stalham's infrastructure, including education, healthcare, and transport, must be enhanced to cope with increased demand. Contributions secured through S106 agreements must be used to address these pressures. • Community Integration: New developments should be carefully planned to integrate well with existing areas, fostering a cohesive and sustainable community. <p>We stress the importance of balancing growth with maintaining the quality of life for existing residents while ensuring infrastructure can support the needs of a growing population.</p> <p>General Recommendations</p> <ol style="list-style-type: none"> 1 Infrastructure Improvements First: Development should only proceed where infrastructure—including flood defences, sewerage systems, and highways—can demonstrably support additional demand. 2 Environmental Sensitivity: Environmental constraints must be central to decision-making, particularly in areas like Catfield with unique and protected ecological features. Local Plan policies must align with recent environmental studies and legal rulings. 3 Community Involvement: Residents' concerns and the input of parish and town councils should be prioritised in decision-making to ensure development meets local needs and respects community character. <p>We urge North Norfolk District Council to carefully consider these points and work collaboratively with our communities to address these concerns effectively.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>Stalham Town Council acknowledges the need for additional housing in North Norfolk and supports sensible, well-integrated development that meets local needs. However, the following priorities must be addressed:</p> <ul style="list-style-type: none"> • Affordable Housing: Future developments must include significant provision of affordable housing and rental properties to support local families and meet the needs of existing residents. • Infrastructure Capacity: Stalham's infrastructure, including education, healthcare, and transport, must be enhanced to cope with increased demand. Contributions secured through S106 agreements must be used to address these pressures. • Community Integration: New developments should be carefully planned to integrate well with existing areas, fostering a cohesive and sustainable community. <p>We stress the importance of balancing growth with maintaining the quality of life for existing residents while ensuring infrastructure can support the needs of a growing population.</p> <p>General Recommendations</p> <ol style="list-style-type: none"> 1 Infrastructure Improvements First: Development should only proceed where infrastructure—including flood defences, sewerage systems, and highways—can demonstrably support additional demand. 2 Environmental Sensitivity: Environmental constraints must be central to decision-making, particularly in areas like Catfield with unique and protected ecological features. Local Plan policies must align with recent environmental studies and legal rulings. 3 Community Involvement: Residents' concerns and the input of parish and town councils should be prioritised in decision-making to ensure development meets local needs and respects community character. <p>We urge North Norfolk District Council to carefully consider these points and work collaboratively with our communities to address these concerns effectively.</p>

Officer Response	<p>Comments noted. The site will be expected to deliver affordable housing in line with the Policy HOU2. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability. The site will be expected to comply with the site-specific policy and the requirements included therein, and all relevant policies in the Local Plan, including Policy ENV8 - High Quality Design.</p> <p>Where the site-specific policy includes requirements relating to infrastructure and creation of technical studies to identify mitigation solutions if required, these will be done as part of the application process and delivered through this approach. The Local Plan is based on a significant amount of evidence across a range of topics ensuring the Plan is up to date with relevant information and local/national policies and guidance where relevant.</p>
Section	Proposed Change 7 - Extended Site Allocation: Land Adjacent to Ingham Road, Stalham (ST19/B)
ID	FC496
Response Date	19/12/2024 11:21:00
Full Name	
Organisation	Barratt David Wilson Homes (Anglia) Ltd
Agent Full Name	Katie Leeder
Agent Organisation	Bidwells
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILE
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	NNDC Further Consultation Representation - Policy ST19-B.pdf
Officer Summary	<p>We strongly support the allocation of ST19/B, land adjacent to Ingham Road, Stalham for residential development. As demonstrated within previous submissions, the site is entirely deliverable, and will make a valuable contribution towards achieving North Norfolk District Council's housing needs during the plan period. Proposed allocation ST19/B represents a suitable location for housing development, is available for delivery, is achievable with a realistic prospect of housing being delivered on the site, and, subject to successful delivery of approximately 150 dwellings, is viable.</p> <p>Some of the detailed wording of the policy (more specifically, some of the criteria attached to the policy) is not considered sound as elements are either not effective nor justified. Accordingly, minor alterations to Policy ST19/B are therefore sought to ensure its soundness. These are considered in further detail below.</p> <p>Criterion 2 - Clarity is required as to whether the requirement for a 2.0m footway relates to the southern side of the site or the southern side of Ingham Road; our assumption is that it means the latter. This will ensure that the policy is effective. In addition, due to constraints relating to the location of existing trees, as well the fact there is no footpath beyond the site to the east and west, it may not be possible or practical for a footpath to be provided along the site's entire frontage on the southern side of Ingham Road. Accordingly, to provide flexibility, the policy should make it clear that the footpath will be provided where appropriate and necessary.</p> <p>Criterion 3 - Since the previous submissions, an initial technical review has been carried out by Richard Jackson Ltd in support of a future planning application for residential development on the site. Based on the review undertaken to date, it may not be possible to accommodate a width of 6.0m along Ingham Road for the entire frontage of the site, particularly due to Arboricultural constraints and land ownership boundaries along the northern side of Ingham Road. To ensure that it is justified and effective and, therefore, sound, Criterion 3 of Policy ST19/B should be amended to only require the widening of Ingham Road to 6.0m westwards from the site access.</p>

	<p>Criterion 7 - To ensure that it is justified and effective and, therefore, sound, Criterion 7 of Policy ST19/B should be amended to require the retention of existing mature trees where appropriate.</p> <p>Criterion 10 - Following a technical review of the site, it is understood that the redundant water main within the site does not exist; therefore, to ensure that the policy remains justified, Criterion 9 of Policy ST19/B should be removed</p> <p>BDW are working in partnership with the landowner, to bring forward the land south of Ingham Road in Stalham for residential development of approximately 150 dwellings, within the first five years of the Local Plan period. The site is currently agricultural use and is available for immediate delivery. Vacant possession will be given to BDW on completion of a contract, which is subject to a satisfactory planning consent. BDW and the landowner confirm that the site is both available and developable in 1 to 5 years.</p> <p>In terms of housing delivery, BDW seek to submit an application by Q2 2025, to either tie in with the adoption of the Local Plan, or earlier if possible. Assuming 6-9 months for the determination of the planning application, alongside a further 9 months for construction to commence on site, housing could start to be delivered on site in 2026, which the first units completed in early 2027. It is estimated that, based on current completion rates of circa 36 dwellings per annum, completion would be in 2030.</p> <p>BDW confirm that, subject to the delivery of at least 150 dwellings, the delivery of the site is viable having regard to the policy requirements of the draft North Norfolk Local Plan, as well as the requirement to provide Nutrient Neutrality mitigation, and there are no factors that we are aware of, at this moment in time, that could prevent the delivery of the site</p>
Officer Response	Comments and support for the site noted. Agree in part to consider modification and amend as necessary. See modification schedule. Disagree with amendments to Criterion 3 as this requirement has arisen from ongoing engagement between the Council and the Highway Authority. Disagree with Criterion 7, is a large site and needs the northern buffer to soften its impact on the wider landscape. The Council have engaged with the site promoters through the Local Plan Process and identification of the site as part of this consultation, Delivery information will be used to inform the Council's latest Housing Trajectory data.
Section	Proposed Change 7 - Extended Site Allocation: Land Adjacent to Ingham Road, Stalham (ST19/B)
ID	FC526
Response Date	19/12/2024 11:06:00
Full Name	Tessa Saunders
Organisation	Spatial & Strategic Planning Manager Anglian Water
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILES</p> <p>The site is adjacent to Stalham WRC catchment which currently has dry weather flow headroom to accommodate the proposed growth from this site.</p> <p>We agree with Clause 8 but suggest that it is reworded for clarity to state:</p> <p><i>The provision of a Foul Drainage Strategy setting out how additional foul flows will be accommodated within the foul sewerage network and delivered demonstrating that there is capacity available in the sewerage network and at the receiving water recycling centre to accommodate wastewater flows from the site prior to commencement of the development. Clear plans should be agreed for any necessary sewerage infrastructure improvements which will need to be confirmed at a project level HRA;</i></p> <p>The supporting text should explain that developers must undertake pre-planning engagement with Anglian Water at the earliest opportunity to assess infrastructure capacity, and any specific requirements that may be needed to deliver the proposed development, which may include sustainable points of connection to our water supply and wastewater networks to minimise impacts on existing communities and the environment. There is limited capacity in the immediate network and a specific foul drainage strategy will be required.</p> <p>In terms of surface water, the downstream network is vulnerable to flood zone 1 and 2 risk, which may result in joint agency impact assessments being required.</p>
Do you consider it necessary to participate in a public hearing	

session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	Anglian Water Response - Front Page 19.12.24.pdf Appendix 1 WRC Capacity and Dry Weather Flow.pdf
Officer Summary	<p>The site is adjacent to Stalham WRC catchment which currently has dry weather flow headroom to accommodate the proposed growth from this site.</p> <p>We agree with Clause 8 but suggest that it is reworded for clarity to state:</p> <p><i>The provision of a Foul Drainage Strategy setting out how additional foul flows will be accommodated within the foul sewerage network and delivered demonstrating that there is capacity available in the sewerage network and at the receiving water recycling centre to accommodate wastewater flows from the site prior to commencement of the development. Clear plans should be agreed for any necessary sewerage infrastructure improvements which will need to be confirmed at a project level HRA;</i></p> <p>The supporting text should explain that developers must undertake pre-planning engagement with Anglian Water at the earliest opportunity to assess infrastructure capacity, and any specific requirements that may be needed to deliver the proposed development, which may include sustainable points of connection to our water supply and wastewater networks to minimise impacts on existing communities and the environment. There is limited capacity in the immediate network and a specific foul drainage strategy will be required.</p> <p>In terms of surface water, the downstream network is vulnerable to flood zone 1 and 2 risk, which may result in joint agency impact assessments being required.</p>
Officer Response	Comments noted. Agree to consider modification and amend as necessary. See modification schedule. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.
Section	Proposed Change 7 - Extended Site Allocation: Land Adjacent to Ingham Road, Stalham (ST19/B)
ID	FC538
Response Date	18/12/2024 15:03:00
Full Name	Caroline Jeffrey
Organisation	Principal Planner, Minerals and Waste Policy Norfolk County Council (Minerals & Waste)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>We are pleased to note that the following new or extended site allocations recognise the site is within a mineral safeguarding area, and include mineral safeguarding requirements within the following policies:</p> <ul style="list-style-type: none"> • Land West of Pine Tree Farm, Cromer (Policy C22/4) • Land East of Tunstead Road, Hoveton (Policy HV01/C) • Land at Brumstead Road, Stalham (Policy ST04/A) • Land Adjacent Ingham Road, Stalham (Policy ST19/B) • Land off Cromer Road & Church Lane, Mundesley (Policy MUN03/A) <p>The following site allocations are within a Minerals Safeguarding Area (sand and gravel), but this has not been included within the draft policy wording. Therefore, we object to these site allocation policies unless appropriate wording, regarding minerals safeguarding, is inserted into the following policies:</p> <ul style="list-style-type: none"> • Land at Stalham Road, Hoveton (Policy HV06/A) • Land at End of Mundesley Road, North Walsham (Policy NW16) • Land West of Langham Road, Blakeney (Policy BLA01/B) <p>The policy wording used in the North Norfolk Local Plan for other sites within Mineral Safeguarding Areas is currently: "The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or</p>

	<p>any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.”</p> <p>Due to the progress on the Norfolk Minerals and Waste Local Plan, which is planned for adoption in 2025 and would then replace the current Minerals and Waste Core Strategy, we advise updating the policy wording for all allocated sites in the North Norfolk Local Plan that are within a Mineral Safeguarding Areas to be worded as follows: <u>“This site is underlain by a defined Mineral Safeguarding Area for sand and gravel resource; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resource does not take place.”</u></p> <p>This wording is required to be inserted into the following policies HV06/A, NW16, BLA01/B and should also be used in policies C22/4, HV01/C, ST04/A, ST19/B and MUN03/A instead of the policy wording on mineral safeguarding used in the consultation document.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>We are pleased to note that the following new or extended site allocations recognise the site is within a mineral safeguarding area, and include mineral safeguarding requirements within the following policies:</p> <ul style="list-style-type: none"> • Land Adjacent Ingham Road, Stalham (Policy ST19/B) <p>The policy wording used in the North Norfolk Local Plan for other sites within Mineral Safeguarding Areas is currently: “The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - ‘safeguarding’ (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.”</p> <p>Due to the progress on the Norfolk Minerals and Waste Local Plan, which is planned for adoption in 2025 and would then replace the current Minerals and Waste Core Strategy, we advise updating the policy wording for all allocated sites in the North Norfolk Local Plan that are within a Mineral Safeguarding Areas to be worded as follows: <u>“This site is underlain by a defined Mineral Safeguarding Area for sand and gravel resource; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resource does not take place.”</u></p> <p>This wording is required to be inserted into the following policies HV06/A, NW16, BLA01/B and should also be used in policies C22/4, HV01/C, ST04/A, ST19/B and MUN03/A instead of the policy wording on mineral safeguarding used in the consultation document.</p>
Officer Response	Comments noted. Agree to consider modification and amend as necessary. See modification schedule.
Section	Proposed Change 7 - Extended Site Allocation: Land Adjacent to Ingham Road, Stalham (ST19/B)
ID	FC546
Response Date	18/12/2024 15:03:00
Full Name	Sarah Luff
Organisation	Norfolk County Council (Lead Local Flood Authority)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>The LLFA note that the sites that have been put forward as part of this review (referred to as Group A sites) are those sites which have been previously assessed through the Local Plan’s Site Assessment Process and considered suitable for development but were not identified for allocation for reasons such as there being more sites than needed at the time for that</p>

specific settlement or, a different site in the same location provided better opportunities for community benefit.

Please note that of the potential sites put forward as part of this consultation, a GIS shapefile has not been provided to the LLFA for one site (F05, Land between Holt and Greenway Lane, Fakenham) and as such this site has not been reviewed as part of this consultation. It is however noted that NNDC have since deemed this site unsuitable for inclusion.

A comprehensive review of the remaining sites has been produced is attached, document title Appendix 2 FW2024_0840 – LLFA Response – Sites Review (Excel).

Please note the LLFA’s response is specific to surface water flood risk. No other sources of flood risk (including but not limited to fluvial and coastal flooding; flooding from artificial sources; groundwater flooding and sewer flooding) have been reviewed as part of this consultation.

The following criteria have been used in our review, see appendix 2:

Surface Water Flood Risk

- These have been reviewed for the 3.33%, 1.0% and 0.1% Annual Exceedance Probability (AEP) events for surface water flooding.
- Where deemed necessary, site-specific comments have been provided.
- Assessment of onsite flood risk is proportionate to the site size and the flood risk significance.

Reports of Internal and Anecdotal (inclusive of external) Flooding

- Reviewed with the LLFAs current flood records (which date back to 2011).
- Onsite and flood records within 500m of the site boundary have been reported.
- Please note all external flood records are deemed to be anecdotal.

Watercourses

- These have been reviewed and identified when onsite or within 100m proximity to the site boundary.
- If a watercourse does not fall within the provided site boundaries (even if it is on the edge of the site boundary) this has been classed as offsite.
- Watercourses have been defined (ordinary watercourse, main river etc)
- We have not defined the ownership of the watercourses in this assessment.
- We have not reviewed offline watercourses, blind ditches or pond features as part of this review. Further investigation will be needed to assess these features, their type and whether they are connected to the wider drainage network.
- We have not defined whether the features are obstructed by housing or roads etc.

Surface and Foul Water Sewer Systems

- Reviewed against Anglian Water Services sewer mapping.
- Both onsite and offsite surface water sewers with 100m of the site boundary have been reported.
- We have not defined whether the features are obstructed by housing or roads etc.

Additional Information

- Source Protection Zones (SPZs) (If applicable)
- Internal Drainage Boards (IDBs) (If applicable)

We have then reported:

1. Would local flood risk/surface water drainage constraints be severe enough to prevent development of the site?
2. Recommendations ranging from standard information required at planning through to requiring review and potential removal if deemed appropriate.

Where appropriate, we have provided additional site-specific comments. For ease of use, we have produced a traffic light system based on the recommendations column:

- Red - Recommend a review of the site and potential removal from the local plan.
- Orange - Significant information required at the planning stage.
- Green - Standard information required at the planning stage.

Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	Appendix 2 FW2024_0840 – LLFA Response – Sites Review (Excel).xlsx
Officer Summary	A comprehensive review of the remaining sites has been produced is attached to this representation, document title Appendix 2 FW2024_0840. LLFA’s response is specific to surface water flood risk. No other sources of flood risk (including but not limited to fluvial and

coastal flooding; flooding from artificial sources; groundwater flooding and sewer flooding) have been reviewed as part of this consultation.

The following criteria have been used in our review, see appendix 2:

Surface Water Flood Risk

- These have been reviewed for the 3.33%, 1.0% and 0.1% Annual Exceedance Probability (AEP) events for surface water flooding.
- Where deemed necessary, site-specific comments have been provided.
- Assessment of onsite flood risk is proportionate to the site size and the flood risk significance.

Reports of Internal and Anecdotal (inclusive of external) Flooding

- Reviewed with the LLFAs current flood records (which date back to 2011).
- Onsite and flood records within 500m of the site boundary have been reported.
- Please note all external flood records are deemed to be anecdotal.

Watercourses

- These have been reviewed and identified when onsite or within 100m proximity to the site boundary.
- If a watercourse does not fall within the provided site boundaries (even if it is on the edge of the site boundary) this has been classed as offsite.
- Watercourses have been defined (ordinary watercourse, main river etc)
- We have not defined the ownership of the watercourses in this assessment.
- We have not reviewed offline watercourses, blind ditches or pond features as part of this review. Further investigation will be needed to assess these features, their type and whether they are connected to the wider drainage network.
- We have not defined whether the features are obstructed by housing or roads etc.

Surface and Foul Water Sewer Systems

- Reviewed against Anglian Water Services sewer mapping.
- Both onsite and offsite surface water sewers with 100m of the site boundary have been reported.
- We have not defined whether the features are obstructed by housing or roads etc.

Additional Information

- Source Protection Zones (SPZs) (If applicable)
- Internal Drainage Boards (IDBs) (If applicable)

We have then reported:

1. Would local flood risk/surface water drainage constraints be severe enough to prevent development of the site?
2. Recommendations ranging from standard information required at planning through to requiring review and potential removal if deemed appropriate.

Where appropriate, we have provided additional site-specific comments. For ease of use, we have produced a traffic light system based on the recommendations column:

- Red - Recommend a review of the site and potential removal from the local plan.
- Orange - Significant information required at the planning stage.
- Green - Standard information required at the planning stage.

Summary of findings within attached document, Appendix 2:

The site was rated as Green in the RAG rating system and the standard information on surface water flooding will be required at the planning application stage.

Officer Response	Comments noted. The site-specific policy includes the requirement for a Foul Drainage Strategy setting how additional foul flows will be accommodated within the foul sewerage network prior to the commencement of development clear plans should be agreed for any necessary sewerage infrastructure improvements which will need to be confirmed at a project level HRA. The LLFA will also be consulted on as part of any future application on site.
Section	Proposed Change 7 - Extended Site Allocation: Land Adjacent to Ingham Road, Stalham (ST19/B)
ID	FC562
Response Date	18/12/2024 15:03:00
Full Name	Richard Doleman
Organisation	Principle Infrastructure Development Planner Norfolk County Council (Highways)
Agent Full Name	
Agent Organisation	

Does the Proposed Change contribute to the overall soundness of the Plan?	No objection subject to the following changes to the proposed ST19/B policy: 'Submission, approval, and implementation of a Transport Assessment to assess transport impacts and identify necessary whether off-site highway mitigation works are necessary. Specifically, consideration is required of traffic capacity at any junctions between the site and the A149'
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	No objection subject to the following changes to the proposed ST19/B policy: 'Submission, approval, and implementation of a Transport Assessment to assess transport impacts and identify necessary whether off-site highway mitigation works are necessary. Specifically, consideration is required of traffic capacity at any junctions between the site and the A149'
Officer Response	Comments noted. Agree to consider modification and amend as necessary. See modification schedule.
Section	Proposed Change 7 - Extended Site Allocation: Land Adjacent to Ingham Road, Stalham (ST19/B)
ID	FC573
Response Date	18/12/2024 15:03:00
Full Name	Paul Harker
Organisation	Place Planning Manager Norfolk County Council (Childrens Services)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	RAG Status = Green Impact on School Estate/Transport Proximity/Capacity to develop schools: If this site comes forward along with a new site at Brumstead Road for 45 dwellings (ST04/A). Taken together the number of dwellings becomes 195 the total number of dwellings will be greater due to other potential allocations. This will put pressure on the Infant School currently though we expect in time this demand could be met by the existing school. Both the infant and junior operate from a single site and the sites are within reasonable walking distance of the local schools.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	RAG Status = Green Impact on School Estate/Transport Proximity/Capacity to develop schools: If this site comes forward along with a new site at Brumstead Road for 45 dwellings (ST04/A). Taken together the number of dwellings becomes 195 the total number of dwellings will be greater due to other potential allocations. This will put pressure on the Infant School currently though we expect in time this demand could be met by the existing school. Both the infant and junior operate from a single site and the sites are within reasonable walking distance of the local schools.

Officer Response	Comments noted. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.
Section	Proposed Change 7 - Extended Site Allocation: Land Adjacent to Ingham Road, Stalham (ST19/B)
ID	FC589
Response Date	19/12/2024 12:03:00
Full Name	Gemma Clark
Organisation	Higher Officer, Sustainable Development, Norfolk Coast and Marine Team Natural England
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILES</p> <p>Impacts to National landscapes Not in National Landscape</p> <p>Nutrient neutrality Stalham lies in the Ant Broads and Marshes Nutrient Neutrality catchment area. As such any planning application will need to be accompanied with a HRA informed by a Nutrient Neutrality budget calculation and mitigation strategy. Mitigation through the purchase of credits has been highlighted in the Additional Sites Review Background Paper, page 22. Further advice on credits is in Annex 5</p> <p>BMV Agricultural land Loss of Grade 1 agricultural land. Further advice on soils is in Annex 2.</p> <p>Recreational disturbance and other issues Contributions to GIRAMS included in the policy Natural England support delivery of multi-functional open space together with measures for its on- going maintenance. However, no detail is provided on how much open space will be provided for the 150 dwellings.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	Natural England - Annex 2.pdf Natural England - Annex 5.pdf
Officer Summary	<p>Not in National Landscape. Stalham lies in the Ant Broads and Marshes Nutrient Neutrality catchment area. As such any planning application will need to be accompanied with a HRA informed by a Nutrient Neutrality budget calculation and mitigation strategy. Mitigation through the purchase of credits has been highlighted in the Additional Sites Review Background Paper, page 22. Further advice on credits is in Annex 5.</p> <p>Loss of Grade 1 agricultural land. Further advice on soils is in Annex 2. Contributions to GIRAMS included in the policy Natural England support delivery of multi-functional open space together with measures for its on- going maintenance. However, no detail is provided on how much open space will be provided for the 150 dwellings.</p>
Officer Response	<p>Comments noted. The Council confirm through ongoing engagement with the site promoters that Nutrient Neutrality would be achieved through off-site mitigation measures such as securing or purchasing credits. Post-LURA upgrade works, the development shall be nitrogen neutral, and without the need for offsite mitigation as demonstrated in the calculations. However, long term phosphorus mitigation will still be required. Norfolk Rivers Consortium have confirmed that it can deliver all the required mitigation at pace and cost in this area.</p> <p>The site is within Grade 1 agricultural land, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. Stalham is identified as a Small Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 and is a</p>

sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.

The quantum of open space provided will be determined through the application process and the site is expected to comply with the Open Space standards set out in the Local Plan, Policy HC2.

Proposed Change 8 - New Site Allocation: Land West of Langham Road (BLA01/B)

Section	Proposed Change 8 - New Site Allocation: Land West of Langham Road (BLA01/B)
ID	FC27
Response Date	12/11/2024 16:24:42
Full Name	Mr James Whittington-Wilson
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Further development in Blakeney is inconsistent with NNDC's priorities of preserving the North Norfolk AONB by maintaining the peaceful charm of small towns and villages. This has been wholly unsuccessful to date with significant developments in many coastal areas including Wells-Next-The-Sea, which has become a tourist attraction rather than a traditional town.</p> <p>In recent years Blakeney too, has seen a number of smaller scale developments and is increasingly becoming a tourist destination which becomes unutterably busy during peak season and virtually abandoned during the winter due to the significant number of second homes in the area, which has also led to a significant increase in property prices. While the national average house price lies at £292,924 while prices in Blakeney average at a staggering £1,030,450.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: Further development in Blakeney is inconsistent with NNDC's priorities of preserving the North Norfolk AONB by maintaining the peaceful charm of small towns and villages. In recent years Blakeney too, has seen a number of smaller scale developments and is increasingly becoming a tourist destination which becomes unutterably busy during peak season and virtually abandoned during the winter due to the significant number of second homes in the area, which has also led to a significant increase in property prices. While the national average house price lies at £292,924 while prices in Blakeney average at a staggering £1,030,450.</p>
Officer Response	<p>Comments noted. The site-specific policy includes mitigation requirements to offset the site's potential impact on the National Landscape. The Council provided a detailed response to the need to provide growth within the National Landscape and this is set out in the Council's Matter 5 Statement (EH011(a)(i)). A detailed site-specific assessment of the site's impact on the National Landscape is available to view in the Additional Sites Background Paper Appendix 1, the conclusion of which is that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape.</p>
Section	Proposed Change 8 - New Site Allocation: Land West of Langham Road (BLA01/B)
ID	FC49
Response Date	07/11/2024 12:44:00
Full Name	Claire Middleton
Organisation	
Agent Full Name	
Agent Organisation	

<p>Does the Proposed Change contribute to the overall soundness of the Plan?</p>	<p>I wish to ask if we really have a choice regarding housing and the other items you have listed? Will you actually take comments on board, make adjustments, and listen to our views?</p> <p>In particular, had it ever crossed the Council's minds that villages don't want to grow and are actually doing quite well without additional housing estates and will not retain their individually once new properties are added.</p> <p>Currently, the council are doing a good job of wrecking our villages, and have been for a quite a while. With inappropriate estate location, lack of infrastructure, house numbers and incongruous building design that bares no relation to the surrounding properties, destroying the unique village character.</p> <p>The council do frequently show their lack of understanding, along with the damaging and detrimental effect their policies and plans have on our communities.</p> <p>As it stands, we as a community, do not hold out much hope of our voices being heard or retaining Norfolk village uniqueness which extends to the surrounding area and countryside. It seems you are intent on the area looking like anywhere else in the country.</p> <p>I am exceeding dissapointed and dissatisfied that the council is happy for this to happen.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>General comment/object: questions whether there is any choice with the proposed changes listed and the effectiveness of the consultation process. Comments that some villages do not wish to grow and that villages and surrounding countryside lose their individuality through inappropriate existing and proposed development, due to the location, size, lack of infrastructure for and ubiquitous design of new housing estates.</p>
<p>Officer Response</p>	<p>Disagree: The Planning Inspector has set out in his Initial Findings letter [Examination ref.EH006(f)] the requirement for additional housing growth in order to support the rural economy. The Inspector specifically comments of the need to modify the approach in Policy SS1 Spatial Strategy to Small Growth Villages. The Inspector has also commented in his letter that policy support for these changes is provided by paragraph 79 of the NPPF 2021 (para. 83 of the NPPF 2023) which advises that '<i>Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services,</i>' further commenting that as submitted, the plan's policies for smaller villages, even some with key services, are unusually restrictive. In writing a Local Plan the Council is required to identify and meet the housing needs of the district through the development of the spatial strategy and the wider policies of the plan balances the competing matters including the protection of the natural environment.</p> <p>There are checks and balances within Policy SS1 to ensure appropriate sustainable development is achieved. The requirements at criterion 3 for Small Growth Village development include 3(c) that, <i>the proposal is small scale, incremental growth compatible with the form and character of the village and its landscape setting in terms of siting, scale, design, impact on heritage assets and historic character.</i> In addition, any proposal would need to satisfy the requirements of a wider range of policies in the Local Plan, for example, Policies ENV8 High Quality of Design.</p>

Section	Proposed Change 8 - New Site Allocation: Land West of Langham Road (BLA01/B)
ID	FC234
Response Date	11/12/2024 16:52:00
Full Name	Tracey Bayfield
Organisation	Parish Clerk/Proper Officer Blakeney Parish Council
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>On 3rd December 2024; Blakeney Parish Council resolved as follows; That we object most strongly to the revision seeking to allocate agricultural land west of Langham Road (BLA01/B; section 2 of the draft plan) for the building of an additional 30 dwellings.</p> <p>This is in addition to the site already allocated in the existing North Norfolk Local Plan for houses to be built on land south of Kingsway off the Langham Road (BLA04/A) which is also for 30 houses, some of which will be affordable housing. This is to meet a government new build housing target, but with no thought to individual locations. Blakeney Parish Council have been at the core of ensuring that a development of 8 affordable houses is to be built by Broadland Housing in partnership with The Blakeney Neighbourhood Housing Society on part of the overflow car park on the east side of Langham Road, this will serve a direct need; as identified by NNDC, ie. affordable social housing for local people. Once planning permission has been obtained, it is envisaged that this build could start in late 2025.</p> <p>The NNDC draft Local Plan identifies a shortfall of housing provision, but it does not address the real issue, which is the lack of affordable homes in Blakeney. The issue of a blanket figure for additional housing is not needed in Blakeney and is a push by Central Government to get more houses built at any cost. It is also noted that the proposed completion date of this new build is 2029, just in time for the next general election.</p> <p>NNDC state that the 'Large Growth Villages' have a number of services but the range is often limited and only Ludham, Mundesley, Briston and <i>Blakeney</i> include a Primary School, convenience shop(s), doctors' surgery, some public transport, some limited local employment, and a limited selection of other services such as a public house, church, post office, and village hall. They act as limited service hubs for other nearby villages. NNDC need to be reminded that Blakeney no longer has a doctor's surgery and therefore no longer meets the definition of a 'Large Growth Village.'</p> <p>What is the proposed new definition of A LARGE GROWTH VILLAGE; as we believe NNDC are making villages 'fit the criteria' now, for want of a better phrase?! Previously it was that, 'available services will support residents and also those in settlements nearby.' We cannot find a later definition and I'm not sure it's changed for Large Growth Villages, it's Blakeney that has changed so it no longer fits the above criteria. Blakeney seems disproportionately harder hit than the other growth villages, (Briston and Mundesley) going up an additional 30 homes, whilst Briston goes up an additional 25 and Mundesley 15.</p> <p>In recent years there has been considerable infill development, a quick count, and we believe that a total of 100 houses have been built/already in the pipeline, in the village replacing just 5, which we consider to be huge growth for the size of the village. We have concerns over whether our amenities and infrastructure can cope with this. There are 721 homes in the parish, 314 are holiday or second homes and 15 are empty. The village does not need more.</p> <p>Whilst we note that this is classed as a 'Strategic Site', it does of course go against our adopted 'Blakeney Neighbourhood Plan', unless these properties are for Principle Residence only. 46 households are currently on the Housing List with a local connection to the parish, and this proposal would not address this need. Surprisingly, the draft NNDC Local Plan makes no reference to the adopted Blakeney Neighbourhood Plan for 2020-2040 which was voted on by parishioners, agreed and published in November 2023. That document at Policy 6, deals with the 'Design of Development' of building in Blakeney to which the NNDC draft plan does not comply with. In addition, Policy 10 of that document, which deals with 'Drainage and Flooding' the NNDC draft Local Plan has also failed to consider.</p> <p>It should also be noted that NNDC previously considered this site and discounted it, stating that; "residential development on the site would have a high level of detrimental impact on the character of the Langham Road approach and would have a high detrimental impact on the wider character of the southern part of the Blakeney as the open farmland set against the village and coastal marshes would be lost etc, etc." Pages 73 – 75 of the draft plan identifies how this site has moved from 'not considered suitable for development', to the 'site is suitable, available and deliverable. It lies within single ownership'.</p> <p>Blakeney Parish Council therefore believes that the inclusion of a new allocation of a further 30 dwellings in the revised draft plan is not needed and should be removed. However, if</p>

	<p>NNDC are minded to proceed with this development, against the wishes of the Parish Council, then each of the new properties, should be 'Principle Dwellings', rather than more second/holiday homes.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>Object: to the revision seeking to allocate agricultural land west of Langham Road (BLA01/B; section 2 of the draft plan) for the building of an additional 30 dwellings. NNDC draft Local Plan identifies a shortfall of housing provision, but it does not address the real issue, which is the lack of affordable homes in Blakeney. NNDC need to be reminded that Blakeney no longer has a doctor's surgery and therefore no longer meets the definition of a 'Large Growth Village.'</p> <p>What is the proposed new definition of A LARGE GROWTH VILLAGE; as we believe NNDC are making villages 'fit the criteria' now, for want of a better phrase?! Previously it was that, 'available services will support residents and also those in settlements nearby.' We cannot find a later definition and I'm not sure it's changed for Large Growth Villages, it's Blakeney that has changed so it no longer fits the above criteria. Blakeney seems disproportionately harder hit than the other growth villages, (Briston and Mundesley) going up an additional 30 homes, whilst Briston goes up an additional 25 and Mundesley 15.</p> <p>Whilst we note that this is classed as a 'Strategic Site', it does of course go against our adopted 'Blakeney Neighbourhood Plan', unless these properties are for Principle Residence only. 46 households are currently on the Housing List with a local connection to the parish, and this proposal would not address this need. Surprisingly, the draft NNDC Local Pan makes no reference to the adopted Blakeney Neighbourhood Plan for 2020-2040 which was voted on by parishioners, agreed and published in November 2023. That document at Policy 6, deals with the 'Design of Development' of building in Blakeney to which the NNDC draft plan does not comply with. In addition, Policy 10 of that document, which deals with 'Drainage and Flooding' the NNDC draft Local Plan has also failed to consider.</p> <p>It should also be noted that NNDC previously considered this site and discounted it, stating that; "residential development on the site would have a high level of detrimental impact on the character of the Langham Road approach and would have a high detrimental impact on the wider character of the southern part of the Blakeney as the open farmland set against the village and coastal marshes would be lost etc, etc.</p> <p>Blakeney Parish Council therefore believes that the inclusion of a new allocation of a further 30 dwellings in the revised draft plan is not needed and should be removed.</p>
<p>Officer Response</p>	<p>Comment cited - Disagree: The selection of all of the identified towns and villages identified within Policy SS1 Spatial Strategy, has followed a consistent methodology as detailed in Background Paper 2 Distribution of Growth [Examination ref C2]. The assessment of the range of services and facilities recorded for each of the villages contained in the Background Paper were reviewed throughout the various stages of the Local Plan process, and prior to the submission of the Local Plan in May 2023 and formed one part of the overall assessment. The justification and principle for each of the submitted settlements with site allocations (Large Growth Towns, Small Growth Towns and Large Growth Villages), including Blakeney, formed part of the discussions during Matters 2 and 5 at the Hearing Sessions based on the information and circumstances at the time of the Hearings. Whilst it is acknowledged that the services and facilities recorded for the settlements may have altered since the submission of the Plan, the principle of their identification and the establishment of the spatial strategy has already been agreed through the earlier hearings sessions. An additional allocation will help support and retain existing services.</p> <p>The need to identify additional sites to satisfy the identified housing shortfall has required the proposal of further sites across the entire settlement hierarchy (Policy SS1 Spatial Strategy), including for the Large Growth Villages, but where the majority of the proposed additional growth would be within Large and Small Growth Towns. The methodology to the proposed site selections are set out in the Additional Sites Review Background Paper, including site BLA01/B Land West of Langham Road, Blakeney (conclusion at para. 3.9). The full site assessment has been reproduced in the document, which also identifies the mitigation measures required within the proposed Policy wording.</p>

	Having been written with full knowledge to the emerging Local Plan policies the Neighbourhood Plan was made in November 2023. The site BLA01/B is proposed as a strategic site and as such the relevant policies of the Blakeney Neighbourhood Plan would be material to its development, including Policy 2 – Managing Second Home Ownership, (Principal Residency) Policy 6 - Design of Development and Policy 10 - Drainage and Flooding. The delivery of the site will provide much needed additional affordable housing in line with policy requirements (35%) and help shape a balanced community.
Section	Proposed Change 8 - New Site Allocation: Land West of Langham Road (BLA01/B)
ID	FC244
Response Date	11/12/2024 17:13:00
Full Name	Mrs Debbie Mack
Organisation	Historic Environment Planning Adviser Historic England
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>Whilst there are no designated heritage assets within this site boundary, there is a scheduled monument two bowl barrows on Blakeney Downs.</p> <p>We therefore welcome criterion 8 although suggest the word mitigate should be amended to mitigation.</p> <p>A Heritage Impact Assessment has been prepared for site BLA01/B although the site name in the HIA is Land South of Morston Road. We assume this is the same site. We welcome the preparation of the HIA. (Additional Sites Review Background Paper p59 - 65) (https://www.north-norfolk.gov.uk/media/10669/fc002-additional-sites-review.pdf). The findings of the HIA including any recommendations for mitigation/enhancement, should be used to inform revised policy wording.</p> <p>We broadly welcome criteria 3, 6, 7 and 8, though suggest the wording could be improved as follows:</p> <p>7. On-site delivery of multi-functional open space <u>and landscaping</u> together with measures for its on-going maintenance;</p> <p>8. Development should conserve, and where appropriate enhance the significance of the <u>heritage assets bowl barrows scheduled monument</u> to the west of the site and provide appropriate <u>mitigation</u> for the impact of development on their setting. <u>Planning applications to be supported by heritage statement with visualisations;</u></p> <p>As currently drafted, the allocation is not consistent with national policy due to impacts on the historic environment and the policy wording is not effective in conserving and enhancing the historic environment. The allocation is therefore, in our view, unsound.</p> <p>The inclusion of this change suggested above would help to ensure that site-specific requirements for development of the site are justified by the findings of the HIA, consistent with national policy and effective in conserving and enhancing the historic environment.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	241218 HE response letter NNLP Further Consult.pdf
Officer Summary	<p>Whilst there are no designated heritage assets within this site boundary, there is a scheduled monument two bowl barrows on Blakeney Downs. We therefore welcome criterion 8 although suggest the word mitigate should be amended to mitigation.</p> <p>A Heritage Impact Assessment has been prepared for site BLA01/B although the site name in the HIA is Land South of Morston Road. We assume this is the same site. We welcome the preparation of the HIA. (Additional Sites Review Background Paper p59 - 65) (https://www.north-norfolk.gov.uk/media/10669/fc002-additional-sites-review.pdf). The findings</p>

	<p>of the HIA including any recommendations for mitigation/enhancement, should be used to inform revised policy wording.</p> <p>We broadly welcome criteria 3, 6, 7 and 8, though suggest the wording could be improved as follows:</p> <p>7. On-site delivery of multi-functional open space <u>and landscaping</u> together with measures for its on-going maintenance;</p> <p>8. Development should conserve, and where appropriate enhance the significance of the <u>heritage assets bowl barrows scheduled monument</u> to the west of the site and provide appropriate mitigation for the impact of development on their setting. <u>Planning applications to be supported by heritage statement with visualisations;</u></p> <p>As currently drafted, the allocation is not consistent with national policy due to impacts on the historic environment and the policy wording is not effective in conserving and enhancing the historic environment. The allocation is therefore, in our view, unsound. The inclusion of this change suggested above would help to ensure that site-specific requirements for development of the site are justified by the findings of the HIA, consistent with national policy and effective in conserving and enhancing the historic environment.</p>
Officer Response	Comments noted. Agree in part to consider modification and amend as necessary. See modification schedule. The Council disagrees with amendment to Criterion 7, this is standard wording used across multiple sites, landscaping requirements are already identified through other site-specific criteria in the policy. Visualisations would be part of any landscape impact assessment and not necessary in relation to Historic environment.
Section	Proposed Change 8 - New Site Allocation: Land West of Langham Road (BLA01/B)
ID	FC298
Response Date	15/12/2024 09:57:00
Full Name	Peter Bullimore
Organisation	Parish Clerk Morston Parish Council
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am instructed to write in support of Blakeney PC's objections and comments.</p> <p>It would appear that Blakeney no longer fits the criteria for a Large Growth Village. The recent loss of the Doctors Surgery and lack of other services concerns Morston PC. If the proposal of further houses proceeds then members wish them to be principle dwellings and not holiday homes.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: in support of Blakeney PC's objections and comments. It appears that Blakeney no longer fits the criteria to be a Large Growth Village, with the loss of the Dcotor's surgery and lack of other services, which is a concern of Morston PC. If the proposal for further houses proceeds, then these should be principal homes, not holiday homes.
Officer Response	Comments noted, Disagree: This matter has already been considered in earlier hearing sessions and does not form part of this further consolation. The selection of all of the identified towns and villages within Policy SS1 Spatial Strategy, has followed a consistent methodology as detailed in Background Paper 2 Distribution of Growth [Examination ref C2]. The assessment of the range of services and facilities recorded for each of the villages contained in the Background Paper were reviewed throughout the various stages of the Local Plan process, and prior to the submission of the Local Plan in May 2023 and formed one part of the overall assessment. The justification and principle for each of the submitted settlements

	<p>with site allocations (Large Growth Towns, Small Growth Towns and Large Growth Villages), including Blakeney, formed part of the discussions during Matters 2 and 5 at the Hearing Sessions based on the information and circumstances at the time of the Hearings. Whilst it is acknowledged that the services and facilities recorded for the settlements may have altered since the submission of the Plan, the principle of their identification has already been established through the earlier hearing sessions.</p> <p>Having been written with full knowledge to the emerging Local Plan policies the Neighbourhood Plan was made in November 2023. The site BLA01/B is proposed as a strategic site and as such the relevant policies of the Blakeney Neighbourhood Plan would be material to its development, including Policy 2 – Managing Second Home Ownership, (Principal Residency) Policy 6 - Design of Development and Policy 10 - Drainage and Flooding. The delivery of the site will provide much needed additional affordable housing in line with policy requirements (35%) and help shape a balanced community</p>
Section	Proposed Change 8 - New Site Allocation: Land West of Langham Road (BLA01/B)
ID	FC353
Response Date	19/12/2024 10:31:43
Full Name	Mr Christopher Yardley
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>The current assessment and policy for this site does not adequately address landscape impacts in relation to the wider damaging effects of the proposed development. The current proposals do not make sufficient provision for landscaping to the southern, and western sides of the site to screen and integrate development into the landscape into this most sensitive of landscapes. This is a nationally important landscape with large views over it. The setting of the hill and Hill House to the west are iconic landmarks in this part of the NNNL. A previous smaller development to the south of the village left landscaping completely out of the development mix and only provided a tiny hedge around the boundary - consequently the development is stark, intrusive and damaging in the landscape - this must not happen again. A buffer of woodland of at least 40m is the least that can be considered appropriate in this hilly location where views down onto the site are provided by the entrance to the village from the south -and would have been a standard provision in the 1990s / early 2000s, but more recent developments have discarded this and the results are ugly, uncharacteristic of older settlement types and damaging to the wider environment. This is not highlighted sufficiently in the policy. Too often large 'land mark' dwellings of two and a half or three stories are placed on prominent positions around such developments - these are totally alien to any previous development styles and should be formally prevented.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: The current assessment and policy for this site does not adequately address landscape impacts in relation to the wider damaging effects of the proposed development. The current proposals do not make sufficient provision for landscaping to the southern, and western sides of the site to screen and integrate development into the landscape into this most sensitive of landscapes. This is a nationally important landscape with large views over it. The setting of the hill and Hill House to the west are iconic landmarks in this part of the NNNL. A buffer of woodland of at least 40m is the least that can be considered appropriate in this hilly location where views down onto the site are provided by the entrance to the village from the south -and would have been a standard provision in the 1990s / early 2000s, but more recent developments have discarded this and the results are ugly, uncharacteristic of older settlement types and damaging to the wider environment. This is not highlighted sufficiently in the policy.</p>
Officer Response	<p>Comments noted. The site-specific policy includes mitigation requirements to offset the site's potential impact on the National Landscape including restrictions on layout and positioning, effectively limiting development to that part of the site that is already adjacent on two sides</p>

	to existing build form / residential development. The Council provided a detailed response to the need to provide growth within the National Landscape and this is set out in the Council's Matter 5 Statement (EH011(a)(i)). A detailed site-specific assessment of the site's impact on the National Landscape is available to view in the Additional Sites Background Paper Appendix 1, the conclusion of which is that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape. A provision of a buffer of 40m would significantly restrict development on-site and prevent a sustainable design from being achieved.
Section	Proposed Change 8 - New Site Allocation: Land West of Langham Road (BLA01/B)
ID	FC404
Response Date	18/12/2024 09:20:00
Full Name	Cllr Victoria Holliday
Organisation	Member for Coastal Ward (NNDC)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>We quite understand the imperative for more housing in North Norfolk. However, when last assessed in 2022, the site allocation in Blakeney, BLA/01B, was considered unsuitable for development and discounted on grounds of landscape and heritage harm. These harms still pertain:</p> <ul style="list-style-type: none"> • Development of this site would lead to significant recreation impact and urban effects on European sites through footpath links, direct access, light pollution, noise etc. • Development of the site, including the access road, would have a negative effect on the quality of the landscape by reducing its rural character, and would have a material impact on the North Norfolk AONB (now the Norfolk Coast National Landscape), affecting views towards Blakeney marshes and Blakeney point from the Langham Road and local public footpaths. • As far as heritage impact is concerned, to the west of the site the HIA identifies that development on this site could cause some impact on the setting within Blakeney Downs of a scheduled monument, two Bronze Age bowl barrows. • BLA01/B is 390m from the boundaries of the Glaven Valley and Blakeney Conservation Areas. <p>Alongside this, when considering development in Blakeney, the array of services available are significantly reduced from those at the time the settlement was given Large Growth Village status. There is no longer is a doctor's surgery, which is one of the key requirements. The submission version of the Local Plan defines LGVs as 'larger villages each with a reasonable range of day-to-day services including at least a primary school, shops, doctors' surgery, village hall.....The available services will support residents and also those in settlements nearby.' The other large growth villages, Briston and Melton Constable, Ludham and Mundesley, all have functioning doctors' surgeries.</p> <p>In addition, in the last decade or so, I understand there have been approximately 100 infill dwellings built in Blakeney. The population increased from 775 in the 2011 census to 801 in 2011. This increase in numbers, which impacts local infrastructure, has not been taken into account when calculating growth.</p> <p>Because of significant landscape and heritage harm the site has previously been considered unsuitable for development. As far as an additional allocation in Blakeney is concerned, there is still the question of the settlement remaining as a Large Growth Village due to loss of a key service, and previous population growth from recent infill additions to the housing stock.</p> <p>Therefore, the site remains unsuitable for development.</p> <p>If it is concluded the site is acceptable, principal residency on this allocation should be included as a condition to conform with Policy 2 in Blakeney Neighbourhood Plan made November 2023, Managing Second Home Ownership.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please	

<p>outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	
<p>Officer Summary</p>	<p>Object: We quite understand the imperative for more housing in North Norfolk. However, when last assessed in 2022, the site allocation in Blakeney, BLA/01B, was considered unsuitable for development and discounted on grounds of landscape and heritage harm. These harms still pertain:</p> <ul style="list-style-type: none"> • Development of this site would lead to significant recreation impact and urban effects on European sites through footpath links, direct access, light pollution, noise etc. • Development of the site, including the access road, would have a negative effect on the quality of the landscape by reducing its rural character, and would have a material impact on the North Norfolk AONB (now the Norfolk Coast National Landscape), affecting views towards Blakeney marshes and Blakeney point from the Langham Road and local public footpaths. • As far as heritage impact is concerned, to the west of the site the HIA identifies that development on this site could cause some impact on the setting within Blakeney Downs of a scheduled monument, two Bronze Age bowl barrows. • BLA01/B is 390m from the boundaries of the Glaven Valley and Blakeney Conservation Areas. <p>Alongside this, when considering development in Blakeney, the array of services available are significantly reduced from those at the time the settlement was given Large Growth Village status. There is no longer is a doctor's surgery, which is one of the key requirements. The submission version of the Local Plan defines LGVs as 'larger villages each with a reasonable range of day-to-day services including at least a primary school, shops, doctors' surgery, village hall....The available services will support residents and also those in settlements nearby.' The other large growth villages, Briston and Melton Constable, Ludham and Mundesley, all have functioning doctors' surgeries.</p> <p>I understand there have been approximately 100 infill dwellings built in Blakeney. The population increased from 775 in the 2011 census to 801 in 2011. This increase in numbers, which impacts local infrastructure, has not been taken into account when calculating growth. Because of significant landscape and heritage harm the site has previously been considered unsuitable for development. As far as an additional allocation in Blakeney is concerned, there is still the question of the settlement remaining as a Large Growth Village due to loss of a key service, and previous population growth from recent infill additions to the housing stock.</p> <p>If it is concluded the site is acceptable, principal residency on this allocation should be included as a condition to conform with Policy 2 in Blakeney Neighbourhood Plan made November 2023, Managing Second Home Ownership.</p>
<p>Officer Response</p>	<p>Comments noted. The site-specific policy includes mitigation requirements to offset the site's potential impact on the National Landscape including restrictions on layout and positioning, effectively limiting development to that part of the site that is already adjacent on two sides to existing build form / residential development.. The Council provided a detailed response to the need to provide growth within the National Landscape and this is set out in the Council's Matter 5 Statement (EH011(a)(i)). A detailed site-specific assessment of the site's impact on the National Landscape is available to view in the Additional Sites Background Paper Appendix 1, the conclusion of which is that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape.</p> <p>The site-specific policy requires development to be located to the north and east, abutting the existing built form to help mitigate the site's visual impact on the wider landscape and views from Blakeney Marshes. This is in addition to the provision of a high-quality landscape buffer along the western boundary of the site which also provides mitigation in relation to heritage assets to the west and limiting vehicular access into the site from the south only. Additionally, the policy includes reference to the delivery of high-quality design which pays careful attention to site layout, building heights and materials to further minimise and mitigate the aforementioned impacts. Blakeney is identified as a Large Growth Village in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy.</p> <p>The Local Plan's identified need takes into account existing growth through existing permitted sites, old allocations and infill developments within settlements identified within the Settlement Hierarchy and in Small Growth Villages, this data is accessible through the Council's Annual Monitoring Reports. The Inspector examining the Local Plan also considers this information</p>

	<p>which is how the conclusion was reached in the Inspector's response to the Local Plan (July 2024 EH006(f)) which states the submitted Plan has a shortfall of housing provision, therefore, the Council are seeking to provide additional allocations to help mitigate this shortfall and meet the revised objectively assessed needs.</p> <p>All relevant neighbourhood planning polices would be a material consideration in the determination of any application.</p>
Section	Proposed Change 8 - New Site Allocation: Land West of Langham Road (BLA01/B)
ID	FC445
Response Date	19/12/2024 10:32:49
Full Name	Mr William Page
Organisation	Planner Pigeon Investment Management Ltd
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>Pigeon and the landowners fully support the inclusion of Land to the West of Langham Road, Blakeney ('BLA01/B – Proposed Change 8') as an additional allocation site.</p> <p>The site will provide a high-quality landscape and design-led sustainable scheme to the south-west of Blakeney. It will deliver the following key benefits including:</p> <ul style="list-style-type: none"> • Creation of extensive open space along the western edge of the Site, providing new ecological habitat, informal open space and the provision of play space for children and young people, as well as creating a permanent green edge to the scheme. • Creation of approximately 30 new homes that will range in type, tenure and size, and reflect the local housing need. • Provision of a green pedestrian and cycle corridor providing a dedicated off-carriageway link, connecting Langham Road and Morston Road. This link will facilitate active travel and enable existing and future residents of Blakeney to access a wider network of Public Rights of Way within the countryside and routes into the centre of Blakeney. • Improvements to the Site's ecology delivering biodiversity net gain in excess of 10%. • High quality landscape and design-led scheme that responds to its immediate and wider landscape setting, with blue and green infrastructure incorporated throughout. Extensive strategic landscaping will provide a positive addition to the local landscape and a buffer to the wider countryside. <p>Please find attached a Vision and Delivery Statement. This demonstrates that the land is immediately available for development, is free from any overriding constraints and is viable taking into account all emerging policy requirements. There are no legal, ownership or other known impediments to prevent the early delivery of new homes on the Site, and the scheme has been informed by a comprehensive assessment of the Site's context and appropriate surveys.</p> <p>Should you require any further information please do not hesitate to contact us.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	Participation in the hearing sessions will provide an opportunity for Pigeon to answer any queries on the proposed allocation of the site at Land to the West of Langham Road. Therefore, we would welcome an opportunity to take part in these sessions.
File (where submitted)	Pigeon - Blakeney Vision Delivery Statement 19122024.pdf
Officer Summary	Pigeon and the landowners fully support the inclusion of Land to the West of Langham Road, Blakeney ('BLA01/B – Proposed Change 8') as an additional allocation site. The site will provide a high-quality landscape and design-led sustainable scheme to the south-west of Blakeney. Attached document is a Vision and Delivery Statement. This demonstrates that the land is immediately available for development, is free from any overriding constraints and is viable taking into account all emerging policy requirements. There are no legal, ownership or other known impediments to prevent the early delivery of new homes on the Site, and the scheme has been informed by a comprehensive assessment of the Site's context and appropriate surveys. the attachments provides more details including confirmation that the scheme will be landscape led and include a semi-natural landscape buffer to Wiveton downs in order to complement and significantly enhance biodiversity.

Officer Response	Comments and detailed assessment including in the Vision Statement in support of the allocation noted.
Section	Proposed Change 8 - New Site Allocation: Land West of Langham Road (BLA01/B)
ID	FC447
Response Date	18/12/2024 19:57:00
Full Name	Mrs Gemma Harrison
Organisation	Parish Clerk - Views of CPC Cley Parish Council
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Cley Parish Council OBJECTS to the site allocation Blakeney BLA/01B being included in the Local Plan. Cllrs believe the site is unsuitable for development and has not been adequately assessed, there has been insufficient evidence provided making this element of the plan unsound.</p> <p>Whilst Cllrs understand the need for more housing in North Norfolk, development should not be allowed where it would be detrimental to the landscape and heritage characteristics. This site is close to the Glaven Valley and Blakeney Conservation areas and nearby Blakeney Downs and two bronze Age bowl barrows. Impacts were noted in the Heritage Impact Assessment for the site and given the significant urbanisation, light pollution and increased traffic movements, it was considered by NNDC in 2022 as unsuitable. Nothing has changed since 2022, and these harms previously identified still remain.</p> <p>Furthermore, there has been no transport assessments taken place so the impact on the road network and the impact this would have on the parish has not been assessed, there has been no opportunity for any mitigation to be considered. Cllrs question how a development site can be properly assessed with out this important information.</p> <p>There has been considerable infill in Blakeney with approximately 100 infill dwellings in the last decade, this has not been considered in the Plan. Further analysis of transport data is needed to identify the impact these infill developments have had. Growth Villages have been identified in the plan as having day to day services. Blakeney has recently lost its Doctors Surgery, it does not have a Primary School and so does not offer the same services as other Growth Villages. Adequate services is important when considering new development, it is felt by Cllrs that Blakeney does not offer adequate services to support this new site. Cllrs object to its Growth Village Status and asks the Inspector to look at what transport evidence is available to reassure Cllrs of any impact the development will bring.</p> <p>Cllrs also raised concerns about the Growth Village Status of Weybourne. This parish used to have a village shop which is now a café on limited hours. Does this still warrant Growth Village Status? Has the change from shop to café been identified as a change in this resubmission? Cllrs believe the status of Growth Village should be removed.</p> <p>Cllrs believe development should occur in towns where there are services available to support future residents and more sustainable travel options are available.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: Cley Parish Council objects to the proposed site allocation BLA/01B being included in the Local Plan, as the site is unsuitable for development and has not been adequately assessed, where insufficient evidence has been provided, making this element of the plan unsound.</p> <p>Whilst the need for more housing is understood, it should occur in towns where there are services available to support future residents and where there are more sustainable travel options. Development should not be allowed where it would be detrimental to the landscape</p>

and heritage designations and characteristics as recorded in the Heritage Impact Assessment for the BLA01/B site. Given the significant urbanisation, light pollution and increased traffic movements, it was considered by NNDC in 2022 as unsuitable. Nothing has changed since 2022, and these previously identified harms still remain. In addition, no transport assessments have been carried out to assess the impact on the road network and therefore, no opportunity for any mitigation to be considered, including in relation to the impact of the considerable infill development that has taken place in Blakeney over the last 10 years, which has not been taken into account in the Plan.

Blakeney has recently lost its Doctors Surgery, and it does not have a Primary School, and so does not offer the same services as other Growth Villages. It is felt that it does not offer adequate services to support this site and its status as a growth village is objected to, as well as, requesting the Inspector to look at what transport evidence is available.

The growth status of Weybourne as a SGV is questioned as the village shop is now a café with limited opening hours. Has this been considered within the consultation. Weybourne should be removed as a SGV.

Officer Response	<p>Disagree: The need to identify additional sites and growth opportunities to satisfy the identified housing shortfall is proposed across the entire settlement hierarchy (Policy SS1 Spatial Strategy), including the Large Growth Villages and small growth villages where there is a requirement to help support the rural economy as set out in the inspectors initial letter. The identification of the site aligns with the approach set out in Additional Sites Review Background Paper, including site BLA01/B Land West of Langham Road, Blakeney (conclusion at para. 3.9). The full site assessment has been reproduced in the document, which also identifies any mitigation measures required within the proposed Policy wording and is entirely proportional and appropriate with the approach set out.</p> <p>The selection of all of the identified towns and villages within Policy SS1 Spatial Strategy, has followed a consistent methodology as detailed in Background Paper 2 Distribution of Growth [Examination ref C2] and the further material provided in the supporting appendices to this Consultation. The assessment of the range of services and facilities recorded for each of the villages contained in the Background Paper were reviewed throughout the various stages of the Local Plan process, and prior to the submission of the Local Plan in May 2023 and formed one part of the overall assessment. The justification and principle for each of the submitted settlements with site allocations (Large Growth Towns, Small Growth Towns and Large Growth Villages), including Blakeney, formed part of the discussions during Matters 2 and 5 at the Hearing Sessions based on the information and circumstances at the time of the Hearings. Whilst it is acknowledged that the services and facilities recorded for the identified settlements, including Small Growth Villages, may have altered since the submission of the Plan, the principle of their identification has already been agreed through the earlier examination process and is not part of this consultation.</p> <p>For information, Norfolk County Council Highways have stated no objection to the proposed allocation policy BLA01/B in their feedback to the Further Consultation. Any site specific transport assessments would be carried out at the planning application stage.</p>
Section	Proposed Change 8 - New Site Allocation: Land West of Langham Road (BLA01/B)
ID	FC527
Response Date	19/12/2024 11:06:00
Full Name	Tessa Saunders
Organisation	Spatial & Strategic Planning Manager Anglian Water
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILES</p> <p>Blakeney is within the Cley-Glandford Rd WRC catchment which has dry weather flow headroom to accommodate the proposed quantum of growth on this site. We agree with Clause 10 but suggest that it is reworded for clarity to state:</p>

	<p><i>Submission, approval and implementation of a Foul Drainage Strategy demonstrating that there is capacity available in the sewerage network and at the receiving water recycling centre to accommodate wastewater flows from the site how additional foul flows will be accommodated within the foul sewerage network;</i></p> <p>The supporting text should explain that developers must undertake pre-planning engagement with Anglian Water at the earliest opportunity to assess infrastructure capacity, and any specific requirements that may be needed to deliver the proposed development, which may include sustainable points of connection to our water supply and wastewater networks to minimise impacts on existing communities and the environment.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	Anglian Water Response - Front Page 19.12.24.pdf Appendix 1 WRC Capacity and Dry Weather Flow.pdf
Officer Summary	<p>Blakeney is within the Cley-Glandford Rd WRC catchment which has dry weather flow headroom to accommodate the proposed quantum of growth on this site. We agree with Clause 10 but suggest that it is reworded for clarity to state:</p> <p><i>Submission, approval and implementation of a Foul Drainage Strategy demonstrating that there is capacity available in the sewerage network and at the receiving water recycling centre to accommodate wastewater flows from the site how additional foul flows will be accommodated within the foul sewerage network;</i></p> <p>The supporting text should explain that developers must undertake pre-planning engagement with Anglian Water at the earliest opportunity to assess infrastructure capacity, and any specific requirements that may be needed to deliver the proposed development, which may include sustainable points of connection to our water supply and wastewater networks to minimise impacts on existing communities and the environment.</p>
Officer Response	The proposed modifications are acknowledged and will be considered further in the Local Plan Examination process. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.
Section	Proposed Change 8 - New Site Allocation: Land West of Langham Road (BLA01/B)
ID	FC536
Response Date	18/12/2024 15:03:00
Full Name	Caroline Jeffrey
Organisation	Principal Planner, Minerals and Waste Policy Norfolk County Council (Minerals & Waste)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>We are pleased to note that the following new or extended site allocations recognise the site is within a mineral safeguarding area, and include mineral safeguarding requirements within the following policies:</p> <ul style="list-style-type: none"> • Land West of Pine Tree Farm, Cromer (Policy C22/4) • Land East of Tunstead Road, Hoveton (Policy HV01/C) • Land at Brumstead Road, Stalham (Policy ST04/A) • Land Adjacent Ingham Road, Stalham (Policy ST19/B) • Land off Cromer Road & Church Lane, Mundesley (Policy MUN03/A) <p>The following site allocations are within a Minerals Safeguarding Area (sand and gravel), but this has not been included within the draft policy wording. Therefore, we object to these site allocation policies unless appropriate wording, regarding minerals safeguarding, is inserted into the following policies:</p> <ul style="list-style-type: none"> • Land at Stalham Road, Hoveton (Policy HV06/A) • Land at End of Mundesley Road, North Walsham (Policy NW16) • Land West of Langham Road, Blakeney (Policy BLA01/B)

	<p>The policy wording used in the North Norfolk Local Plan for other sites within Mineral Safeguarding Areas is currently: "The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority."</p> <p>Due to the progress on the Norfolk Minerals and Waste Local Plan, which is planned for adoption in 2025 and would then replace the current Minerals and Waste Core Strategy, we advise updating the policy wording for all allocated sites in the North Norfolk Local Plan that are within a Mineral Safeguarding Areas to be worded as follows: <i>"This site is underlain by a defined Mineral Safeguarding Area for sand and gravel resource; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resource does not take place."</i></p> <p>This wording is required to be inserted into the following policies HV06/A, NW16, BLA01/B and should also be used in policies C22/4, HV01/C, ST04/A, ST19/B and MUN03/A instead of the policy wording on mineral safeguarding used in the consultation document.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>The following site allocations are within a Minerals Safeguarding Area (sand and gravel), but this has not been included within the draft policy wording. Therefore, we object to these site allocation policies unless appropriate wording, regarding minerals safeguarding, is inserted into the following policies:</p> <p>Land West of Langham Road, Blakeney (Policy BLA01/B)</p> <p>The policy wording used in the North Norfolk Local Plan for other sites within Mineral Safeguarding Areas is currently: "The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority."</p> <p>Due to the progress on the Norfolk Minerals and Waste Local Plan, which is planned for adoption in 2025 and would then replace the current Minerals and Waste Core Strategy, we advise updating the policy wording for all allocated sites in the North Norfolk Local Plan that are within a Mineral Safeguarding Areas to be worded as follows: <i>"This site is underlain by a defined Mineral Safeguarding Area for sand and gravel resource; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resource does not take place."</i></p> <p>This wording is required to be inserted into the following policies HV06/A, NW16, BLA01/B and should also be used in policies C22/4, HV01/C, ST04/A, ST19/B and MUN03/A instead of the policy wording on mineral safeguarding used in the consultation document.</p>
Officer Response	Comments noted. Agree to consider modification and amend as necessary. See modification schedule.
Section	Proposed Change 8 - New Site Allocation: Land West of Langham Road (BLA01/B)
ID	FC547
Response Date	18/12/2024 15:03:00
Full Name	Sarah Luff
Organisation	Norfolk County Council (Lead Local Flood Authority)
Agent Full Name	
Agent Organisation	

<p>Does the Proposed Change contribute to the overall soundness of the Plan?</p>	<p>SEE ATTACHED FILE</p> <p>The LLFA note that the sites that have been put forward as part of this review (referred to as Group A sites) are those sites which have been previously assessed through the Local Plan's Site Assessment Process and considered suitable for development but were not identified for allocation for reasons such as there being more sites than needed at the time for that specific settlement or, a different site in the same location provided better opportunities for community benefit.</p> <p>Please note that of the potential sites put forward as part of this consultation, a GIS shapefile has not been provided to the LLFA for one site (F05, Land between Holt and Greenway Lane, Fakenham) and as such this site has not been reviewed as part of this consultation. It is however noted that NNDC have since deemed this site unsuitable for inclusion.</p> <p>A comprehensive review of the remaining sites has been produced is attached, document title Appendix 2 FW2024_0840 – LLFA Response – Sites Review (Excel).</p> <p>Please note the LLFA's response is specific to surface water flood risk. No other sources of flood risk (including but not limited to fluvial and coastal flooding; flooding from artificial sources; groundwater flooding and sewer flooding) have been reviewed as part of this consultation.</p> <p>The following criteria have been used in our review, see appendix 2:</p> <p>Surface Water Flood Risk</p> <ul style="list-style-type: none"> • These have been reviewed for the 3.33%, 1.0% and 0.1% Annual Exceedance Probability (AEP) events for surface water flooding. • Where deemed necessary, site-specific comments have been provided. • Assessment of onsite flood risk is proportionate to the site size and the flood risk significance. <p>Reports of Internal and Anecdotal (inclusive of external) Flooding</p> <ul style="list-style-type: none"> • Reviewed with the LLFAs current flood records (which date back to 2011). • Onsite and flood records within 500m of the site boundary have been reported. • Please note all external flood records are deemed to be anecdotal. <p>Watercourses</p> <ul style="list-style-type: none"> • These have been reviewed and identified when onsite or within 100m proximity to the site boundary. • If a watercourse does not fall within the provided site boundaries (even if it is on the edge of the site boundary) this has been classed as offsite. • Watercourses have been defined (ordinary watercourse, main river etc) • We have not defined the ownership of the watercourses in this assessment. • We have not reviewed offline watercourses, blind ditches or pond features as part of this review. Further investigation will be needed to assess these features, their type and whether they are connected to the wider drainage network. • We have not defined whether the features are obstructed by housing or roads etc. <p>Surface and Foul Water Sewer Systems</p> <ul style="list-style-type: none"> • Reviewed against Anglian Water Services sewer mapping. • Both onsite and offsite surface water sewers with 100m of the site boundary have been reported. • We have not defined whether the features are obstructed by housing or roads etc. <p>Additional Information</p> <ul style="list-style-type: none"> • Source Protection Zones (SPZs) (If applicable) • Internal Drainage Boards (IDBs) (If applicable) <p>We have then reported:</p> <ol style="list-style-type: none"> 1. Would local flood risk/surface water drainage constraints be severe enough to prevent development of the site? 2. Recommendations ranging from standard information required at planning through to requiring review and potential removal if deemed appropriate. <p>Where appropriate, we have provided additional site-specific comments. For ease of use, we have produced a traffic light system based on the recommendations column:</p> <ul style="list-style-type: none"> • Red - Recommend a review of the site and potential removal from the local plan. • Orange - Significant information required at the planning stage. • Green - Standard information required at the planning stage.
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	<p>No</p>
<p>If you wish to participate in a hearing session(s), please</p>	

outline why you consider this to be necessary:	
File (where submitted)	Appendix 2 FW2024_0840 – LLFA Response – Sites Review (Excel).xlsx
Officer Summary	<p>A comprehensive review of the remaining sites has been produced is attached to this representation, document title Appendix 2 FW2024_0840. LLFA's response is specific to surface water flood risk. No other sources of flood risk (including but not limited to fluvial and coastal flooding; flooding from artificial sources; groundwater flooding and sewer flooding) have been reviewed as part of this consultation.</p> <p>The following criteria have been used in our review, see appendix 2:</p> <p>Surface Water Flood Risk</p> <ul style="list-style-type: none"> • These have been reviewed for the 3.33%, 1.0% and 0.1% Annual Exceedance Probability (AEP) events for surface water flooding. • Where deemed necessary, site-specific comments have been provided. • Assessment of onsite flood risk is proportionate to the site size and the flood risk significance. <p>Reports of Internal and Anecdotal (inclusive of external) Flooding</p> <ul style="list-style-type: none"> • Reviewed with the LLFAs current flood records (which date back to 2011). • Onsite and flood records within 500m of the site boundary have been reported. • Please note all external flood records are deemed to be anecdotal. <p>Watercourses</p> <ul style="list-style-type: none"> • These have been reviewed and identified when onsite or within 100m proximity to the site boundary. • If a watercourse does not fall within the provided site boundaries (even if it is on the edge of the site boundary) this has been classed as offsite. • Watercourses have been defined (ordinary watercourse, main river etc) • We have not defined the ownership of the watercourses in this assessment. • We have not reviewed offline watercourses, blind ditches or pond features as part of this review. Further investigation will be needed to assess these features, their type and whether they are connected to the wider drainage network. • We have not defined whether the features are obstructed by housing or roads etc. <p>Surface and Foul Water Sewer Systems</p> <ul style="list-style-type: none"> • Reviewed against Anglian Water Services sewer mapping. • Both onsite and offsite surface water sewers with 100m of the site boundary have been reported. • We have not defined whether the features are obstructed by housing or roads etc. <p>Additional Information</p> <ul style="list-style-type: none"> • Source Protection Zones (SPZs) (If applicable) • Internal Drainage Boards (IDBs) (If applicable) <p>We have then reported:</p> <ol style="list-style-type: none"> 1. Would local flood risk/surface water drainage constraints be severe enough to prevent development of the site? 2. Recommendations ranging from standard information required at planning through to requiring review and potential removal if deemed appropriate. <p>Where appropriate, we have provided additional site-specific comments. For ease of use, we have produced a traffic light system based on the recommendations column:</p> <ul style="list-style-type: none"> • Red - Recommend a review of the site and potential removal from the local plan. • Orange - Significant information required at the planning stage. • Green - Standard information required at the planning stage. <p>Summary of findings within attached document, Appendix 2:</p> <p>The site was rated as Green in the RAG rating system and the standard information on surface water flooding will be required at the planning application stage.</p>
Officer Response	<p>Comments noted. The site-specific policy includes the requirement for a Surface Water Management Plan to demonstrate that greenfield run off rates from the site are not increased. The policy also includes a requirement for a Foul Drainage Strategy that will provide details of any enhancements and set out how additional foul flows will be accommodated within the foul sewerage network, this will be delivered prior to the occupation of any dwellings. The LLFA will also be consulted on as part of any future application on site.</p>
Section	Proposed Change 8 - New Site Allocation: Land West of Langham Road (BLA01/B)
ID	FC561
Response Date	18/12/2024 15:03:00
Full Name	Richard Doleman

Organisation	Principle Infrastructure Development Planner Norfolk County Council (Highways)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	No objection to the proposed allocation policy.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	No objection to the proposed allocation policy.
Officer Response	Comments noted.
Section	Proposed Change 8 - New Site Allocation: Land West of Langham Road (BLA01/B)
ID	FC577
Response Date	18/12/2024 15:03:00
Full Name	Paul Harker
Organisation	Place Planning Manager Norfolk County Council (Childrens Services)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	RAG Status = Amber Impact on School Estate/Transport Proximity/Capacity to develop schools: The Primary School will be able to meet additional demand from this development. Alderman Peel High School does not have capacity for further expansion due to it's constrained site. The school draws a significant number of pupils from adjoining catchments, its likely this development will push those children back to their home catchments and could add pressure to those schools as a result. Transport consideration would given to ensure there are safe walking cycling routes to the local schools (this is a highways related response, for them to comment on). Any contributions required to mitigate this development, if the site comes forward, would be sought in response to the planning application.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	RAG Status = Amber Impact on School Estate/Transport Proximity/Capacity to develop schools: The Primary School will be able to meet additional demand from this development. Alderman Peel High School does not have capacity for further expansion due to it's constrained site. The school draws a significant number of pupils from adjoining catchments, its likely this development will push those children back to their home catchments and could add pressure to those schools as a result. Transport consideration would given to ensure there are safe walking cycling routes to the local schools (this is a highways related response, for them to comment on). Any contributions required to mitigate this development, if the site comes forward, would be sought in response to the planning application.

Officer Response	Comments noted. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.
Section	Proposed Change 8 - New Site Allocation: Land West of Langham Road (BLA01/B)
ID	FC590
Response Date	19/12/2024 12:03:00
Full Name	Gemma Clark
Organisation	Higher Officer, Sustainable Development, Norfolk Coast and Marine Team Natural England
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILES</p> <p>Impacts to National landscapes The site is in the Norfolk Coast National Landscape within the Rolling Heath and Arable landscape character area. This is an elevated open landscape where increased development would have a significant visual impact. In the Additional Sites Review Background Paper, page 30, the site is described as 'not considered suitable for development. Development of this site would have a negative effect on the quality of landscape by reducing the rural character, extending into open countryside and would have a greater material impact on wider views, the National Landscape and historic environment'.</p> <p>Therefore, a Landscape Visual Impact Assessment (LVIA) will be required as part of a planning application. Further advice on landscapes is in Annex 3</p> <p>Nutrient neutrality Not in a Nutrient Neutrality catchment</p> <p>BMV Agricultural land Loss of agricultural land. Not specified what grade. Further advice on soils is in Annex 2.</p> <p>Recreational disturbance and other issues Contributions to GIRAMS included in the policy Natural England is concerned that the additional 30 dwellings adjacent to Wiveton Downs SSSI will cause increased recreational disturbance to the site. A SSSI Impact Assessment will be required as part of an application. The site is close to the Norfolk Coast Ramsar, Special Protection Area (SPA), Special Area of Conservation (SAC) and SSSI. These sites along the coast are under high recreational pressure. This leads to erosion, reduced ecological diversity and unfavourable condition assessments, plus a major disturbance impact on coastal breeding and ground nesting birds.</p> <p>Therefore, more green spaces are needed to take recreational pressure off these National Site Network habitats SAC/SPA/SSSI/ coastal sites. Many of which are also National Nature Reserves (NNR)</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	Natural England - Annex 2.pdf Natural England - Annex 3.pdf
Officer Summary	<p>The site is in the Norfolk Coast National Landscape within the Rolling Heath and Arable landscape character area. This is an elevated open landscape where increased development would have a significant visual impact. In the Additional Sites Review Background Paper, page 30, the site is described as 'not considered suitable for development. Development of this site would have a negative effect on the quality of landscape by reducing the rural character, extending into open countryside and would have a greater material impact on wider views, the National Landscape and historic environment'.</p> <p>Therefore, a Landscape Visual Impact Assessment (LVIA) will be required as part of a planning application. Further advice on landscapes is in Annex 3. Not in a Nutrient Neutrality catchment. Loss of agricultural land. Not specified what grade. Further advice on soils is in Annex 2.</p>

	<p>Contributions to GIRAMS included in the policy. Natural England is concerned that the additional 30 dwellings adjacent to Wiveton Downs SSSI will cause increased recreational disturbance to the site. A SSSI Impact Assessment will be required as part of an application. The site is close to the Norfolk Coast Ramsar, Special Protection Area (SPA), Special Area of Conservation (SAC) and SSSI. These sites along the coast are under high recreational pressure. This leads to erosion, reduced ecological diversity and unfavourable condition assessments, plus a major disturbance impact on coastal breeding and ground nesting birds. Therefore, more green spaces are needed to take recreational pressure off these National Site Network habitats SAC/SPA/SSSI/ coastal sites. Many of which are also National Nature Reserves (NNR)</p>
<p>Officer Response</p>	<p>Comments noted. The site-specific policy includes mitigation requirements to offset the site's potential impact on the National Landscape. The Council provided a detailed response to the need to provide growth within the National Landscape and this is set out in the Council's Matter 5 Statement (EH011(a)(i)). A detailed site-specific assessment of the site's impact on the National Landscape is available to view in the Additional Sites Background Paper Appendix 1, the conclusion of which is that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape. The provision of an LVIA will be provided as part of the application process.</p> <p>The entirety of Blakeney is within Grade 3 agricultural land, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. Blakeney is identified as a Large Growth Village in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.</p> <p>The site-specific policy includes requirements to provide open space on-site in addition to providing footway connections to the existing settlement to encourage movement towards the village and within the site over movement towards designated sites.</p>

Proposed Change 9 - Extended Site Allocation: Land at Astley Primary School, Briston (BRI02/B)

Section	Proposed Change 9 - Extended Site Allocation: Land at Astley Primary School, Briston (BRI02/B)
ID	FC24
Response Date	12/11/2024 16:01:22
Full Name	Mr James Whittington-Wilson
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>This development proposal is not effective or justified and will have a negative impact upon local biodiversity.</p> <p>Briston is a small village which has poor transport links and access to the village is significantly restricted by on street parking on Briston Road B1354 in Melton Constable. Additional housing in Briston will only exacerbate the issue of passing through Melton Constable as development will introduce additional traffic.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<ul style="list-style-type: none"> This development proposal is not effective or justified and will have a negative impact upon local biodiversity. <p>Briston is a small village which has poor transport links and access to the village is significantly restricted by on street parking on Briston Road B1354 in Melton Constable. Additional housing in Briston will only exacerbate the issue of passing through Melton Constable as development will introduce additional traffic.</p>
Officer Response	<p>Comments noted. The site-specific policy includes requirements to provide landscaping and green wildlife links throughout the site including the retention and enhancement of existing hedgerows, all of which will help mitigate the site's potential impact on biodiversity. Highways Authority have raised no objection this proposal. The site-specific policy includes the requirement for a school pick up/drop off parking area, the location and exact design of which will be explored through the application process.</p>
Section	Proposed Change 9 - Extended Site Allocation: Land at Astley Primary School, Briston (BRI02/B)
ID	FC130
Response Date	03/12/2024 16:32:06
Full Name	Louisa West
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>The main road from Melton Constable to Briston is already busy and dangerous to all users. The doctor's surgery is not able to deal with existing residents, let alone more. There is already no adequate safe walking, cycling and parking for people from nearby villages to access the local shops, doctor and school.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes

If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	Local surrounding village residents need to have their needs considered,
File (where submitted)	
Officer Summary	Object: The main road from Melton Constable to Briston is already busy and dangerous to all users. The doctor's surgery is not able to deal with existing residents, let alone more. There is already no adequate safe walking, cycling and parking for people from nearby villages to access the local shops, doctor and school.
Officer Response	Comments noted. Opportunities to provide for local infrastructure beyond what is included within the site-specific policy will be explored through the application process.
Section	Proposed Change 9 - Extended Site Allocation: Land at Astley Primary School, Briston (BRI02/B)
ID	FC148
Response Date	06/12/2024 12:46:03
Full Name	Mrs Anna Holt
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>No. This proposed change does not contribute anything positive whatsoever. How can anyone believe this to be feasible when the local infrastructure roads, schools, Drs are already over subscribed.</p> <p>Children already living in Beston and Melton are having to travel to other schools as Astley is over subscribed. Surely it would be better to use some of this land to build an extension to the school, a bigger Drs surgery</p> <p>Any new development in this rural area should be carried out on brownfield sites, NOT greenfield sites. It will have a detrimental affect to the local biodiversity</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	<p>Object: Children already living in Beston and Melton are having to travel to other schools as Astley is over subscribed. Surely it would be better to use some of this land to build an extension to the school, a bigger Drs surgery</p> <p>Any new development in this rural area should be carried out on brownfield sites, NOT greenfield sites. It will have a detrimental affect to the local biodiversity</p>
Officer Response	Comments noted. Opportunities to provide for local infrastructure beyond what is included within the site-specific policy will be explored through the application process. Development in this location is in compliance with the Council's strategy for growth. The Council has a Brownfield Register, there are not enough sites on this register to accommodate the required growth needed as set out in Policy SS1.
Section	Proposed Change 9 - Extended Site Allocation: Land at Astley Primary School, Briston (BRI02/B)
ID	FC209
Response Date	10/12/2024 12:23:07
Full Name	Mr John Davies
Organisation	Chairman

	Briston Parish Council
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>The proposed change is not justified in terms of meeting the local need for affordable housing rather it just uplifts the number of dwellings to way beyond the capacity of the local infrastructure with no provision to specifically address affordable housing, provision of school places and improvement in the road infrastructure</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	To ensure that the views of Briston Parish Council are publicly presented and addressed
File (where submitted)	Development around Astley School.docx
Officer Summary	<p>Object: We believe that you have decided to extend the land designated for development around Astley School such that the number of envisaged houses for the sites becomes 90 rather than 60. At least the Local Plan does stipulate the creation of a car park to ease congestion around the school.</p> <p>But, NNDC Planning have seen fit to grant permission to a developer at Manor Farm to create 11 dwellings with no affordable housing, just a £50,000 contribution to some affordable housing fund, but nothing allocated to Briston.</p> <p>There is a further proposed development behind Holly House in the Lane for another 9 properties, again with no allocation to affordable housing.</p> <p>If NNDC were to mandate that all development around Astley School must be affordable housing you could meet the current demand for 95 households and at the same time go a long way to creating 15% of increased 943 houses target as affordable as well.</p> <p>Any development around Astley School will have a significant impact on the infrastructure – school places, traffic, water and sewerage and health services.</p> <p>The school is full. As one year 6 leaves for secondary school reducing the roll by 30 another 30 are expected to be admitted.</p> <p>Every new build brings the possibility of more children and already primary school age children moving into Briston (or Melton Constable) risk having to go to a different school. This applied to the 11 properties at Manor Farm and equally to the 9 properties behind Holly House. 20 new properties in total.</p> <p>If a further 90 properties are built this gives an increase of 110 properties. Given the style of properties approved for Manor Farm and proposed for Holly House it seems reasonable to assume that at least 50% of these properties will be for families with 2 primary school age children per property. This generates an additional school place demand of 110 – half the total capacity of Astley School.</p> <p>How do you expect the existing road structure to cope with this extra traffic, not just on the Fakenham road in Briston, but on the same road passing through Melton Constable which always has parked cars on one side of the road?</p> <p>Concerns have been expressed that the foul water drainage in Briston will not readily cope with 90 new properties. Already smaller developments at the Hawthorns (Old School Road and Hollow Tree Way) have involved a new pumping station to ensure that the sewerage will work.</p> <p>Residents have already submitted detailed reports on the risk to habitat.</p> <p>Our plea to North Norfolk District Council is that Briston does not need 90 new 4 bed houses as the best commercial result for any developer, we do need 90 affordable houses to meet the housing need identified by NNDC Housing.</p>
Officer Response	Comments noted. Opportunities to provide for local infrastructure beyond what is included within the site-specific policy will be explored through the application process. The provision of affordable housing is required by policy and the site is expected to be in compliance with the policies set out in the Local Plan. The site-specific policy includes a requirement to provide a Foul Drainage Strategy, including how additional foul flows will be accommodated within the foul sewerage network.

Section	Proposed Change 9 - Extended Site Allocation: Land at Astley Primary School, Briston (BRI02/B)
ID	FC216
Response Date	09/12/2024 20:13:00
Full Name	Mr G Whaling
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	I write regarding the proposed changes to the Local Plan. Having looked at the proposal for the land at Astley primary school, I note that yet again it is proposed that Hillside should have a pick up/ drop off point and again access to the site. Clearly the inspector has not actually come and looked at the sight for themselves. As the Inspector should be aware, Hillside is a cul de sac, so I fail to see where a pick up/ drop off point could be sited, nor is it suitable for vehicular access, unless of course, those tenants who wish to are rehomed in a property of the same type as they currently reside. Also, has been made, the infrastructure of Briston, cannot withstand another 90 homes. The school, GP surgery which is run by Holt Medical Practice, have clearly stated there are no spaces to take on the extra workload that 90 homes would make. Is the Inspector going to sanction the development of a new school and GP surgery with which to supplement that which already exists. As it has been suggested that the construction should be off the main Fakenham road, is the Inspector going to sanction the closing of the road, being it is a main road, especially as it is common for parents to park directly outside and alongside Astley primary school, to drop off and collect their children. Would it not be possible for the school to actually sacrifice some of its land for a pick up/ drop off point actually within school grounds as this would surely be safer for parents and children alike.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: I note that yet again it is proposed that Hillside should have a pick up/ drop off point and again access to the site. Clearly the inspector has not actually come and looked at the sight for themselves. As the Inspector should be aware, Hillside is a cul de sac, so I fail to see where a pick up/ drop off point could be sited, nor is it suitable for vehicular access. the infrastructure of Briston, cannot withstand another 90 homes. The school, GP surgery which is run by Holt Medical Practice, have clearly stated there are no spaces to take on the extra workload that 90 homes would make.
Officer Response	Comments noted. The provision of access from either Fakenham Road or Hillside is suitable and achievable, Hillside has a direct access onto Fakenham Road. the design and layout of which will be determined through the application process. The location of the school pick up/drop off point is not determined in the site-specific policy and will also be explored through the application process. Briston & Melton Constable are two separate parishes that are closely related in terms of their close proximity to each other and together are identified as a Large Growth Village in the Settlement Hierarchy and is a sustainable location for growth as set out in Policy SS1. This matter has already been considered in earlier hearing sessions.
Section	Proposed Change 9 - Extended Site Allocation: Land at Astley Primary School, Briston (BRI02/B)
ID	FC245
Response Date	11/12/2024 17:13:00
Full Name	Mrs Debbie Mack
Organisation	Historic Environment Planning Adviser Historic England
Agent Full Name	

Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>UNFOUND</p> <p>Whilst there are no designated heritage assets on this site, development of this site (and BRI01) would remove an important gap and separation between the villages of Melton Constable and Briston. Consideration should also be given to the issue of coalescence of settlements.</p> <p>We welcome the preparation of a Heritage Impact Assessment in the Historic Environment Topic Paper. This has been updated to reflect the extended site boundary. (Additional Sites Review Background Paper p65-72 - https://www.north-norfolk.gov.uk/media/10669/fc002-additional-sites-review.pdf). The HIA considers the potential impacts of the development on heritage assets and makes a number of helpful policy recommendations.</p> <p>In our SOCG (https://www.north-norfolk.gov.uk/media/9761/ex023-statement-of-common-ground-nndc-historic-england.pdf), we set out our concerns in relation to this site.</p> <p>Further to that, our Matter 5 hearing statement (https://www.north-norfolk.gov.uk/media/9861/eh011-l-historic-england-response-to-miqs-matter-5.pdf) set out our ongoing concerns in detail.</p> <p>As set out in our hearing statement, in reviewing the HIA again, the main mitigation recommendations from the HIA that is missing from the policy criteria are:</p> <ul style="list-style-type: none"> • Respect and reflect the massing and heights of surrounding dwellings and buildings, which are a mixture of single and two storeys • Landscaping to the eastern boundary should be extended and enhanced to create a gap between the settlements • Open space should be located on the eastern boundary to further create a gap between the settlements <p>It is our view that the impacts, effects and consequent recommendations in the HIA have not been fully taken into account in the policy formulation. To that end the site-specific requirements for the development of the site would not be effective and would not be consistent with national policy to secure the conservation and enhancement of the historic environment.</p> <p>We therefore recommend amending policy criterion 8 as follows:</p> <p>8. Retention and enhancement of existing hedgerows and landscaping to all the site boundaries particularly to the east and west. Landscaping and open space along eastern boundary to retain gap between settlements: and,</p> <p>We also recommend a new criterion to read:</p> <ul style="list-style-type: none"> • 'Development to respect height and massing of surrounding area.' <p>We note that criterion 9 (the proposed modification PMIN/19.1/02) to reads as follows: 'Development should conserve or where appropriate enhance the significance of heritage assets (including any contribution made to the significance by setting) both within the site and the wider area including Manor Farmhouse, a Grade II listed building.'</p> <p>However, this would be more appropriate for policy BRI01 which is closer to the Manor Farmhouse.</p> <p>As currently drafted, the allocation is not consistent with national policy due to impacts on the historic environment and the policy wording is not effective in conserving and enhancing the historic environment. The allocation is therefore, in our view, unsound.</p> <p>The inclusion of this change suggested above would help to ensure that site-specific requirements for development of the site are justified by the findings of the HIA, consistent with national policy and effective in conserving and enhancing the historic environment.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	241218 HE response letter NNLP Further Consult.pdf

<p>Officer Summary</p>	<p>Object: Whilst there are no designated heritage assets on this site, development of this site (and BRI01) would remove an important gap and separation between the villages of Melton Constable and Briston. Consideration should also be given to the issue of coalescence of settlements.</p> <p>We welcome the preparation of a Heritage Impact Assessment in the Historic Environment Topic Paper. This has been updated to reflect the extended site boundary. (Additional Sites Review Background Paper p65-72 - https://www.north-norfolk.gov.uk/media/10669/fc002-additional-sites-review.pdf). The HIA considers the potential impacts of the development on heritage assets and makes a number of helpful policy recommendations. In our SOCG (https://www.north-norfolk.gov.uk/media/9761/ex023-statement-of-common-ground-rndc-historic-england.pdf), we set out our concerns in relation to this site. Further to that, our Matter 5 hearing statement (https://www.north-norfolk.gov.uk/media/9861/eh011-historic-england-response-to-miqs-matter-5.pdf) set out our ongoing concerns in detail.</p> <p>As set out in our hearing statement, in reviewing the HIA again, the main mitigation recommendations from the HIA that is missing from the policy criteria are:</p> <ul style="list-style-type: none"> • Respect and reflect the massing and heights of surrounding dwellings and buildings, which are a mixture of single and two storeys • Landscaping to the eastern boundary should be extended and enhanced to create a gap between the settlements • Open space should be located on the eastern boundary to further create a gap between the settlements <p>It is our view that the impacts, effects and consequent recommendations in the HIA have not been fully taken into account in the policy formulation. To that end the site-specific requirements for the development of the site would not be effective and would not be consistent with national policy to secure the conservation and enhancement of the historic environment.</p> <p>We therefore recommend amending policy criterion 8 as follows:</p> <p>8. Retention and enhancement of existing hedgerows and landscaping to all the site boundaries particularly to the east and west. <u>Landscaping and open space along eastern boundary to retain gap between settlements;</u> and,</p> <p>We also recommend a new criterion to read:</p> <ul style="list-style-type: none"> • <u>'Development to respect height and massing of surrounding area.'</u> <p>We note that criterion 9 (the proposed modification PMIN/19.1/02) to reads as follows: 'Development should conserve or where appropriate enhance the significance of heritage assets (including any contribution made to the significance by setting) both within the site and the wider area including Manor Farmhouse, a Grade II listed building.'</p> <p>However, this would be more appropriate for policy BRI01 which is closer to the Manor Farmhouse.</p> <p>As currently drafted, the allocation is not consistent with national policy due to impacts on the historic environment and the policy wording is not effective in conserving and enhancing the historic environment. The allocation is therefore, in our view, unsound.</p> <p>The inclusion of this change suggested above would help to ensure that site-specific requirements for development of the site are justified by the findings of the HIA, consistent with national policy and effective in conserving and enhancing the historic environment.</p>
<p>Officer Response</p>	<p>Comments noted. Agree in part to consider modification and amend as necessary. See modification schedule. Criterion 5 and 8 of the site-specific policy both relate to the provision of landscaping and green wildlife links throughout the site and make reference to the retention of existing hedgerows, all of which helps contribute towards ensuring there is a sense of separation within the site. These matters have also been considered previously in the SoCG between the Council and Historic England. Providing open space along the eastern boundary to the school will significantly restrict the the developable area and the opportunity to create a well-designed development by moving the site's built form towards the southern boundary which is more sensitive within the context of the wider landscape. The site abuts the school's playing fields which already provides a sense of separation.</p>
<p>Section</p>	<p>Proposed Change 9 - Extended Site Allocation: Land at Astley Primary School, Briston (BRI02/B)</p>
<p>ID</p>	<p>FC265</p>
<p>Response Date</p>	<p>16/12/2024 00:09:00</p>
<p>Full Name</p>	<p>Elizabeth Bennett</p>
<p>Organisation</p>	<p></p>

Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I Feel that the proposed development of the site west of Astley school Briston needs further consideration.</p> <p>I understand that housing is needed but the current infrastructure in Briston/Melton Constable does not adequately support the current population so the additional housing will put further strain on the existing infrastructure.</p> <p>Infrastructure problems that already exist are</p> <p>Schools oversubscribed so young children have to travel to primary school. Parents living in proposed affordable housing are unlikely to have transport.</p> <p>Public transport very limited and not suitable times for getting children to school and back to get to work.</p> <p>Valuable agricultural land being built on.</p> <p>Fakenham Road is not coping with the current traffic now so additional housing with cars will increase congestion. There were at least 4 traffic accidents between Astley school and the Briston/ Holt road crossroads last year. Widening the road will only encourage more speeding and risk to life. It is extremely difficult to drive through Melton at school drop off times.</p> <p>As in many areas accessing Medical, Dental, Pharmacy, Hospital services is very poor in Briston. Transport to these services is difficult.</p> <p>Flooding is a problem in the village so additional homes will put more pressure on existing water and sewer pipes.</p> <p>I have serious concerns about the damage to wildlife and disturbance to natural habitats. Briston has ancient hedgerows, ponds and other important habitats which will be damaged by increased building.</p> <p>I accept that some new housing needs to be built but the site west of Astley will inevitably be extended south and surround the school . The school will need to extend to accommodate more pupils but will be surrounded by housing and be unable to grow according to need.</p> <p>This plan uses valuable agricultural land which once lost will never be regained. Food security is very important and every field lost will add to nationwide reduction of food production. Norfolk is very important in food production.</p> <p>I am only a resident in Briston but I'm very concerned about this development getting too big and causing damage to the successful and supportive community.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	The information is not easily available to the local people . Finding this document and negotiating it has taken me over an hour so many people are not going to do this so you are missing valuable input
File (where submitted)	
Officer Summary	<p>Object: I understand that housing is needed but the current infrastructure in Briston/Melton Constable does not adequately support the current population so the additional housing will put further strain on the existing infrastructure. Valuable agricultural land being built on. Fakenham Road is not coping with the current traffic now so additional housing with cars will increase congestion. Flooding is a problem in the village so additional homes will put more pressure on existing water and sewer pipes. serious concerns about the damage to wildlife and disturbance to natural habitats. Briston has ancient hedgerows, ponds and other important habitats which will be damaged by increased building. The school will need to extend to accommodate more pupils but will be surrounded by housing and be unable to grow according to need.</p>
Officer Response	<p>Comments noted. Briston & Melton Constable are two separate parishes that are closely related in terms of their close proximity to each other and together are identified as a Large Growth Village in the Settlement Hierarchy and is a sustainable location for growth as set out in Policy SS1. Opportunities to provide for local infrastructure beyond what is included within the site-specific policy will be explored through the application process. The site-specific policy includes a requirement to provide a Foul Drainage Strategy, including how additional foul flows will be accommodated within the foul sewerage network. The site-specific policy also includes requirements for appropriate landscaping and the provision of green wildlife links throughout the site.</p>

Section	Proposed Change 9 - Extended Site Allocation: Land at Astley Primary School, Bristol (BRI02/B)
ID	FC355
Response Date	19/12/2024 10:32:08
Full Name	Mr Christopher Yardley
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	The current assessment and policy for this site does not adequately address landscape impacts in relation to the wider damaging effects of the proposed development. The current proposals do not make sufficient provision for landscaping to the southern and western sides of the site to screen and integrate development into the landscape. A buffer of woodland of at least 40m is the least that can be considered appropriate -and would have been a standard provision in the 1990s / early 2000s, but more recent developments have discarded this and the results are ugly, uncharacteristic of older settlement types and damaging to the wider environment. This will protect the landscape beyond the site which is part of an attractive rural location. This is a sensitive, intimate and attractive rural landscape which needs to be protected. This is not highlighted sufficiently in the policy. So many developments on the edge of settlements seem to simply abut up to the boundary with possibly a hedge between them and the open rural landscape beyond. This is out of character with the majority of older, organic development in this village, and until about 10 years ago, the better designed and landscaped new developments. Similarly large dwellings on the boundary are inappropriate. Too often large 'land mark' dwellings of three stories are placed on prominent positions around such developments - these are totally alien to any previous development styles and should be formally prevented
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	Object: The current assessment and policy for this site does not adequately address landscape impacts in relation to the wider damaging effects of the proposed development. The current proposals do not make sufficient provision for landscaping to the southern and western sides of the site to screen and integrate development into the landscape. A buffer of woodland of at least 40m is the least that can be considered appropriate. This will protect the landscape beyond the site which is part of an attractive rural location. This is a sensitive, intimate and attractive rural landscape which needs to be protected. This is not highlighted sufficiently in the policy. This is out of character with the majority of older, organic development in this village, and until about 10 years ago, the better designed and landscaped new developments.
Officer Response	Comments noted. The site-specific policy includes requirements to provide appropriate landscaping throughout the site with particular reference to providing mitigation along the southern boundary which mitigates the impact on wider views from the south and west. Providing a 40m buffer will significantly affect the site's ability to provide a sustainable design that delivers on the requirements set out in the site-specific policy.
Section	Proposed Change 9 - Extended Site Allocation: Land at Astley Primary School, Bristol (BRI02/B)
ID	FC406
Response Date	18/12/2024 09:53:00
Full Name	ClIr Andrew Fletcher
Organisation	Member for Bristol Ward (NNDC)
Agent Full Name	
Agent Organisation	

<p>Does the Proposed Change contribute to the overall soundness of the Plan?</p>	<p>Who would not support the extension of housing provision in a village at a time of dire housing need? And, indeed, there is a level of support in Briston for developments which would respond to the character of the housing need which exists, and there has been a general degree of support for the existing planning provision dor a development to the east and west of Astley School. However, experience of recent developments which have been allowed to go ahead in the village, and a concern for the disproportionate enlargement of the village beyond the capacities of its services to cope with enlargement have given rise to a great deal of scepticism which threatens to derail support which mor rational proposal might elicit.</p> <p>While there are many for whom any prospect of development is repulsive in principle, it seems clear that the real requirement for new housing ought to be satisfied in a way which gains the support of the significant proportion of the population of the village who are prepared to assent to a well-thought-out scheme, rather than alienating them by allowing development which fulfils a statistical need rather than satisfying the actual demand which exists.</p> <p>Consequently, there are two levels of objection to the current plan. The first is that of actual threats to the locality that it poses. So:</p> <p>1 A development of 90 houses will impose a considerably increased burden of traffic flow onto the Fakenham Road which is already overcharged with traffic, often exceeding the speed limit, and where no significant provision has been made for calming measures.</p> <p>An additional problem here is that, at times when parents are setting down and picking up children from Astle School, the lies of parked cars along the edge of the road effectively reduce the Fakenham Road to a single carriageway. T he current plan does, indeed, allow for increased parking at the School, but this will only cover staffing and visitor needs.</p> <p>2 A large development to the south of the school will gobble up a large tract of arable land which at present has considerable natural and heritage assets. In other words, it will constitute a significant loss of natural amenity in the village, at a time of acute sensitivity to the need to preserve environmental assets for the benefit of current residents and their children in the future.</p> <p>3 Services in the village are limited. The Doctors' surgery in Melton has been threatened with closure on and off for the past three years. There are only two shops in the center of the village, and their stock is limited and naturally more expensive than larger establishments can afford. The school is full in Reception and Year 1, though increase in population is not seen as an existing challenge there. A large development will turn an already populous village into a small town, but without the services that should support a population of that size. This inevitably encourages increased car journeys to bigger towns which can satisfy the needs of the residents. The result is a "polo mint" village, with over-large numbers of houses, and no real centre to give the community cohesion.</p> <p>The second level of objection arises from fears that existing developments in the village have aroused.</p> <p>1 There is a dire need for affordable housing in the village. However, recent proposals for developments at Manor Farm and Holly House have appeared to flout this need. In the case of Manor farm a sum of £50,000 has been offered by the developers to cover the failure to provide affordable housing. This is neither adequate nor is there any guarantee that the sum will be spent in enhancing housing in Briston itself. In the Holly House development, a couple of houses will be affordable in principle, but they will be small bungalows which will not provide accommodation for young families which is where the real needs lie if the economy of the area is to be maintained by younger residents of working age.</p> <p>2 The development at Holly House will consume a significant piece of land to the north of Orchard Close. There will be, clearly, a "biodiversity net loss" by the (relatively small) development which is planned. This has not been compensated for by any extension of natural assets in the village, however, but is due to be made up elsewhere in the county.</p> <p>All these exploit the village without providing any benefit for existing residents. Is there any wonder that there is opposition to a plan which people fear will run the sam risks as these, especially as the increase in housing demand is so urgent and indiscriminate?</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	

Officer Summary	<p>Object: Who would not support the extension of housing provision in a village at a time of dire housing need? And, indeed, there is a level of support in Briston for developments which would respond to the character of the housing need which exists, and there has been a general degree of support for the existing planning provision for a development to the east and west of Astley School. However, experience of recent developments which have been allowed to go ahead in the village, and a concern for the disproportionate enlargement of the village beyond the capacities of its services to cope with enlargement have given rise to a great deal of scepticism which threatens to derail support which a more rational proposal might elicit.</p> <p>It seems clear that the real requirement for new housing ought to be satisfied in a way which gains the support of the significant proportion of the population of the village who are prepared to assent to a well-thought-out scheme, rather than alienating them by allowing development which fulfils a statistical need rather than satisfying the actual demand which exists.</p> <p>A development of 90 houses will impose a considerably increased burden of traffic flow onto the Fakenham Road which is already overcharged with traffic, often exceeding the speed limit, and where no significant provision has been made for calming measures. An additional problem here is that, at times when parents are setting down and picking up children from Astley School, the lines of parked cars along the edge of the road effectively reduce the Fakenham Road to a single carriageway. The current plan does, indeed, allow for increased parking at the School, but this will only cover staffing and visitor needs.</p> <p>A large development to the south of the school will gobble up a large tract of arable land which at present has considerable natural and heritage assets. In other words, it will constitute a significant loss of natural amenity in the village, at a time of acute sensitivity to the need to preserve environmental assets for the benefit of current residents and their children in the future.</p> <p>Services in the village are limited. The Doctors' surgery in Melton has been threatened with closure on and off for the past three years. There are only two shops in the center of the village, and their stock is limited and naturally more expensive than larger establishments can afford. The school is full in Reception and Year 1, though increase in population is not seen as an existing challenge there. There is a dire need for affordable housing in the village. All these exploit the village without providing any benefit for existing residents.</p>
Officer Response	<p>Comments noted. Briston & Melton Constable are two separate parishes that are closely related in terms of their close proximity to each other, their reliance on services between each village and together, they are identified as a Large Growth Village in the Settlement Hierarchy and is a sustainable location for growth as set out in Policy SS1. The Local Plan's approach to growth has been open to public consultation throughout the Plan's process and is based on providing for a District-Wide need. The identification of this proposal is based on thorough assessment of the site's suitability, availability and deliverability, as expressed through the Site Assessment Booklet (D10) and in Appendix 1 to the Additional Sites Review Background Paper. Much of the comment does not relate to the modification proposed and largely reiterates points already examined <u>and/or</u> relates to policies or matters which do not form part of this consultation</p> <p>The provision of access from either Fakenham Road or Hillside is suitable and achievable. The Highways Authority have raised no objection to this proposal. The car park is identified in the site-specific policy as a school pick up/drop off parking area, the location and exact design of which will be explored through the application process. The site is located on arable land and is not included within any national or locally significant designations. Development on this site provides an opportunity to enhance the natural amenity by creating accessible spaces and on-site open space. The site is expected to deliver affordable housing in accordance with Policy HOU2 of the Local Plan.</p>
Section	Proposed Change 9 - Extended Site Allocation: Land at Astley Primary School, Briston (BRI02/B)
ID	FC410
Response Date	17/12/2024 18:14:00
Full Name	Mike Frostdick
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILES</p> <p>Please see attached Honey Monitoring Report.</p>

	<p>I would also like to bring to the attention of The Planners at North Norfolk District Council the woodland area around Astley County Primary School is a: Priority Habitat Inventory- Deciduous Woodlands (England) and is home to many species of: Tawny Owls, Little Owls, Song Thrushes, Wrens, Chaffinches, Gold Finches, Skylarks, Green and Red Spotted Wood Peckers, Kestrels, Sparrow Hawks, Buzzards, Crows, Pigeons, plus many more, the field to the rear of the school was always sown with wild bird seed and throughout the year was visited by large flocks of many species of birds.</p> <p>This is also a habitat to a large population of Hedgehogs, Red Deer, Muntjac, Roe Deer and Chinese Water Deer, Badgers, Brown Hares and Foxes, these are all in the fields, hedgerows that surround the school grounds, plus there is a study now being put in place to verify that there are Dormice in the habitat.</p> <p>This area at the rear of Astley County Primary School is under: The Countryside Stewardship Water Quality Priority Areas High Priority (England), with these protections in place this development should not go ahead as it would have a serious impact on the environment and wildlife.</p> <p>This development should not go ahead, as this would also have a large impact at the East and South Ends of this development, due to its close proximity to neighbouring household boundaries and the development would overlook their properties, some residents have indicated that they would lose their human rights to enjoy the freedom of their properties and gardens and have indicated that they would contest this in The Human Right Court of Law.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	<p>Yes</p>
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	<p>I have over 60 years of residency in Briston and I believe the proposed development will restrict Astley County Primary School's ability to expand in the future which will almost certainly be a requirement.</p> <p>I believe the development is within the Bure Nutrient Neutrality Area, I don't see how such a large development can negate itself in this respect whatsoever.</p> <p>I know that as a Bee-Keeper, and active member of The British Beekeepers Association (BBKA) that this will have a negative impact on our honey bee health, from the plans submitted, the development will be right up onto my boundary fence and as a result of this I will have to either sell or destroy my 16 hives of bees, as there is already a high loss of pollinators, this will certainly have a large impact on the surrounding area.</p> <p>Please see attached Honey Monitoring Report showing the 2km area surrounding my hives, this is not a very good report concerning the Fauna and Flora.</p>
<p>File (where submitted)</p>	<p>National Honey Monitoring Results 2022.docx objection_20241218_0002.pdf</p>
<p>Officer Summary</p>	<p>Object: I believe the proposed development will restrict Astley County Primary School's ability to expand in the future which will almost certainly be a requirement. I believe the development is within the Bure Nutrient Neutrality Area, I don't see how such a large development can negate itself in this respect whatsoever.</p> <p>I know that as a Bee-Keeper, and active member of The British Beekeepers Association (BBKA) that this will have a negative impact on our honey bee health, from the plans submitted, the development will be right up onto my boundary fence and as a result of this I will have to either sell or destroy my 16 hives of bees, as there is already a high loss of pollinators, this will certainly have a large impact on the surrounding area.</p> <p>The farmland in question serves as a vital habitat for local flora and fauna, contributing to the biodiversity of our area, concerning the area of the Woodland around Astley school is listed on The Government web site as a protected habitat. The loss of this habitat would not only harm these species but would also detract from the natural character of our community, furthermore, the environmental cost of such a development as this build in an area that is controlled by "The Countryside Stewardship", would be: The water quality priority area with the Highest Priority (England) (Taken from The Government web site) this often includes increased pollution, changes to water drainage patterns, and the urbanization of previously green spaces, the consequences would irreparably alter the landscape and harm the natural environment that we all value.</p> <p>Beyond the immediate environmental and educational implications, this development raises broader concerns about local infrastructure, this would add to the traffic congestion, on the B1354 at Melton Constable village where this already major problem and has suffered several accidents and fatalities in the past and the present.</p> <p>Also attached is a comprehensive report on National Honey Monitoring.</p>

Officer Response	<p>Comments noted. Education capacity information is provided by the Education Authority and financial contributions will be considered through the application process in line with Developer contribution policy HC4. The site included within the Bure Nutrient Neutrality Catchment Area, the promoters intend to address nutrient neutrality by providing mitigation on land within the landowner's ownership that is located on the upper reaches of the Bure system. This approach was confirmed during the previous hearing sessions undertaken from January-March 2024 and the Inspector raised no objection at that time.</p> <p>The site-specific policy includes requirements to provide landscaping and green wildlife links throughout the site including the retention and enhancement of existing hedgerows, all of which will help mitigate the site's potential impact on biodiversity. The site is located on arable land and is not included within any national or locally significant designations. Development on this site provides an opportunity to enhance the natural amenity by creating accessible spaces and on-site open space. The woodland located within the boundary of Astley School is not included within any designation.</p> <p>The Highways Authority have raised no objection this proposal. The site-specific policy includes the requirement for a school pick up/drop off parking area, the location and exact design of which will be explored through the application process.</p>
Section	Proposed Change 9 - Extended Site Allocation: Land at Astley Primary School, Briston (BRI02/B)
ID	FC528
Response Date	19/12/2024 11:06:00
Full Name	Tessa Saunders
Organisation	Spatial & Strategic Planning Manager Anglian Water
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILES</p> <p>The site is within the catchment of Briston WRC which currently has dry weather flow headroom to accommodate the proposed quantum of growth from this extended site allocation – however capacity is limited. We agree with Clause 6 but suggest that it is reworded for clarity to state: <i>Submission, approval and implementation of a Foul Drainage Strategy demonstrating that there is capacity available in the sewerage network and at the receiving water recycling centre to accommodate wastewater flows from the site how additional foul flows will be accommodated within the foul sewerage network;</i></p> <p>The supporting text should explain that developers must undertake pre-planning engagement with Anglian Water at the earliest opportunity to assess infrastructure capacity, and any specific requirements that may be needed to deliver the proposed development, which may include sustainable points of connection to our water supply and wastewater networks to minimise impacts on existing communities and the environment. There is limited capacity in the network, therefore the need for a foul drainage strategy is supported.</p> <p>We note and support the constraints identified in para. 2.9.4 which identifies that a water main runs through the site. Appropriate policy measures should be applied to ensure that developers undertake early engagement with Anglian Water to safeguard our assets and take account of associated easements so these assets can continue to be repaired and maintained as necessary.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	Anglian Water Response - Front Page 19.12.24.pdf Appendix 1 WRC Capacity and Dry Weather Flow.pdf
Officer Summary	The site is within the catchment of Briston WRC which currently has dry weather flow headroom to accommodate the proposed quantum of growth from this extended site allocation – however capacity is limited. We agree with Clause 6 but suggest that it is reworded for clarity to state:

	<p><i>Submission, approval and implementation of a Foul Drainage Strategy demonstrating that there is capacity available in the sewerage network and at the receiving water recycling centre to accommodate wastewater flows from the site how additional foul flows will be accommodated within the foul sewerage network;</i></p> <p>The supporting text should explain that developers must undertake pre-planning engagement with Anglian Water at the earliest opportunity to assess infrastructure capacity, and any specific requirements that may be needed to deliver the proposed development, which may include sustainable points of connection to our water supply and wastewater networks to minimise impacts on existing communities and the environment. There is limited capacity in the network, therefore the need for a foul drainage strategy is supported.</p> <p>We note and support the constraints identified in para. 2.9.4 which identifies that a water main runs through the site. Appropriate policy measures should be applied to ensure that developers undertake early engagement with Anglian Water to safeguard our assets and take account of associated easements so these assets can continue to be repaired and maintained as necessary.</p>
Officer Response	Comments noted. Agree to consider modification and amend as necessary. See modification schedule. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.
Section	Proposed Change 9 - Extended Site Allocation: Land at Astley Primary School, Briston (BRI02/B)
ID	FC548
Response Date	18/12/2024 15:03:00
Full Name	Sarah Luff
Organisation	Norfolk County Council (Lead Local Flood Authority)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>The LLFA note that the sites that have been put forward as part of this review (referred to as Group A sites) are those sites which have been previously assessed through the Local Plan's Site Assessment Process and considered suitable for development but were not identified for allocation for reasons such as there being more sites than needed at the time for that specific settlement or, a different site in the same location provided better opportunities for community benefit.</p> <p>Please note that of the potential sites put forward as part of this consultation, a GIS shapefile has not been provided to the LLFA for one site (F05, Land between Holt and Greenway Lane, Fakenham) and as such this site has not been reviewed as part of this consultation. It is however noted that NNDC have since deemed this site unsuitable for inclusion.</p> <p>A comprehensive review of the remaining sites has been produced is attached, document title Appendix 2 FW2024_0840 – LLFA Response – Sites Review (Excel).</p> <p>Please note the LLFA's response is specific to surface water flood risk. No other sources of flood risk (including but not limited to fluvial and coastal flooding; flooding from artificial sources; groundwater flooding and sewer flooding) have been reviewed as part of this consultation.</p> <p>The following criteria have been used in our review, see appendix 2:</p> <p>Surface Water Flood Risk</p> <ul style="list-style-type: none"> • These have been reviewed for the 3.33%, 1.0% and 0.1% Annual Exceedance Probability (AEP) events for surface water flooding. • Where deemed necessary, site-specific comments have been provided. • Assessment of onsite flood risk is proportionate to the site size and the flood risk significance. <p>Reports of Internal and Anecdotal (inclusive of external) Flooding</p> <ul style="list-style-type: none"> • Reviewed with the LLFAs current flood records (which date back to 2011). • Onsite and flood records within 500m of the site boundary have been reported. • Please note all external flood records are deemed to be anecdotal. <p>Watercourses</p> <ul style="list-style-type: none"> • These have been reviewed and identified when onsite or within 100m proximity to the site boundary. • If a watercourse does not fall within the provided site boundaries (even if it is on the edge of the site boundary) this has been classed as offsite.

	<ul style="list-style-type: none"> • Watercourses have been defined (ordinary watercourse, main river etc) • We have not defined the ownership of the watercourses in this assessment. • We have not reviewed offline watercourses, blind ditches or pond features as part of this review. Further investigation will be needed to assess these features, their type and whether they are connected to the wider drainage network. • We have not defined whether the features are obstructed by housing or roads etc. <p>Surface and Foul Water Sewer Systems</p> <ul style="list-style-type: none"> • Reviewed against Anglian Water Services sewer mapping. • Both onsite and offsite surface water sewers with 100m of the site boundary have been reported. • We have not defined whether the features are obstructed by housing or roads etc. <p>Additional Information</p> <ul style="list-style-type: none"> • Source Protection Zones (SPZs) (If applicable) • Internal Drainage Boards (IDBs) (If applicable) <p>We have then reported:</p> <ol style="list-style-type: none"> 1. Would local flood risk/surface water drainage constraints be severe enough to prevent development of the site? 2. Recommendations ranging from standard information required at planning through to requiring review and potential removal if deemed appropriate. <p>Where appropriate, we have provided additional site-specific comments. For ease of use, we have produced a traffic light system based on the recommendations column:</p> <ul style="list-style-type: none"> • Red - Recommend a review of the site and potential removal from the local plan. • Orange - Significant information required at the planning stage. • Green - Standard information required at the planning stage.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	Appendix 2 FW2024_0840 – LLFA Response – Sites Review (Excel).xlsx
Officer Summary	<p>A comprehensive review of the remaining sites has been produced is attached to this representation, document title Appendix 2 FW2024_0840. LLFA’s response is specific to surface water flood risk. No other sources of flood risk (including but not limited to fluvial and coastal flooding; flooding from artificial sources; groundwater flooding and sewer flooding) have been reviewed as part of this consultation.</p> <p>The following criteria have been used in our review, see appendix 2:</p> <p>Surface Water Flood Risk</p> <ul style="list-style-type: none"> • These have been reviewed for the 3.33%, 1.0% and 0.1% Annual Exceedance Probability (AEP) events for surface water flooding. • Where deemed necessary, site-specific comments have been provided. • Assessment of onsite flood risk is proportionate to the site size and the flood risk significance. <p>Reports of Internal and Anecdotal (inclusive of external) Flooding</p> <ul style="list-style-type: none"> • Reviewed with the LLFAs current flood records (which date back to 2011). • Onsite and flood records within 500m of the site boundary have been reported. • Please note all external flood records are deemed to be anecdotal. <p>Watercourses</p> <ul style="list-style-type: none"> • These have been reviewed and identified when onsite or within 100m proximity to the site boundary. • If a watercourse does not fall within the provided site boundaries (even if it is on the edge of the site boundary) this has been classed as offsite. • Watercourses have been defined (ordinary watercourse, main river etc) • We have not defined the ownership of the watercourses in this assessment. • We have not reviewed offline watercourses, blind ditches or pond features as part of this review. Further investigation will be needed to assess these features, their type and whether they are connected to the wider drainage network. • We have not defined whether the features are obstructed by housing or roads etc. <p>Surface and Foul Water Sewer Systems</p> <ul style="list-style-type: none"> • Reviewed against Anglian Water Services sewer mapping. • Both onsite and offsite surface water sewers with 100m of the site boundary have been reported.

	<ul style="list-style-type: none"> We have not defined whether the features are obstructed by housing or roads etc. <p>Additional Information</p> <ul style="list-style-type: none"> Source Protection Zones (SPZs) (If applicable) Internal Drainage Boards (IDBs) (If applicable) <p>We have then reported:</p> <ol style="list-style-type: none"> Would local flood risk/surface water drainage constraints be severe enough to prevent development of the site? Recommendations ranging from standard information required at planning through to requiring review and potential removal if deemed appropriate. <p>Where appropriate, we have provided additional site-specific comments. For ease of use, we have produced a traffic light system based on the recommendations column:</p> <ul style="list-style-type: none"> Red - Recommend a review of the site and potential removal from the local plan. Orange - Significant information required at the planning stage. Green - Standard information required at the planning stage. <p>Summary of findings within attached document, Appendix 2:</p> <p>The site was rated as Green in the RAG rating system and the standard information on surface water flooding will be required at the planning application stage.</p>
Officer Response	Comments noted. The site-specific policy includes a requirement to provide a Foul Drainage Strategy including how additional foul flows will be accommodated within the foul sewerage network and provide on-site open space and landscaping. The LLFA will also be consulted on as part of any future application on site.
Section	Proposed Change 9 - Extended Site Allocation: Land at Astley Primary School, Briston (BRI02/B)
ID	FC560
Response Date	18/12/2024 15:03:00
Full Name	Richard Doleman
Organisation	Principle Infrastructure Development Planner Norfolk County Council (Highways)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	No objection to the proposed allocation policy.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	No objection to the proposed allocation policy.
Officer Response	Comments noted.
Section	Proposed Change 9 - Extended Site Allocation: Land at Astley Primary School, Briston (BRI02/B)
ID	FC580
Response Date	18/12/2024 15:03:00
Full Name	Paul Harker
Organisation	Place Planning Manager Norfolk County Council (Childrens Services)
Agent Full Name	
Agent Organisation	

Does the Proposed Change contribute to the overall soundness of the Plan?	RAG Status = Amber Impact on School Estate/Transport Proximity/Capacity to develop schools: If this site came forward it would currently put pressure on both primary and secondary sectors. The site is adjacent to the primary school so no transport issues exist. The school has limited capacity to meet demand and more housing would provide additional demand supporting a measured growth for the school from 1 form of entry to 2 form of entry. Expansion at Reepham High will also require assessment. Any contributions required would be sought in response to the planning application if this site comes forward.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
File (where submitted)	
Officer Summary	RAG Status = Amber Impact on School Estate/Transport Proximity/Capacity to develop schools: If this site came forward it would currently put pressure on both primary and secondary sectors. The site is adjacent to the primary school so no transport issues exist. The school has limited capacity to meet demand and more housing would provide additional demand supporting a measured growth for the school from 1 form of entry to 2 form of entry. Expansion at Reepham High will also require assessment. Any contributions required would be sought in response to the planning application if this site comes forward.
Officer Response	Comments noted. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.
Section	Proposed Change 9 - Extended Site Allocation: Land at Astley Primary School, Briston (BRI02/B)
ID	FC591
Response Date	19/12/2024 12:03:00
Full Name	Gemma Clark
Organisation	Higher Officer, Sustainable Development, Norfolk Coast and Marine Team Natural England
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILES Impacts to National landscapes Not in or near a National Landscape Nutrient neutrality The site is on the border of the Bure Broads and Marshes Nutrient Neutrality catchment area. As such any planning application will need to be accompanied with a HRA informed by a Nutrient Neutrality budget calculation and mitigation strategy. The Additional Sites Review Background Paper, page 33 states that mitigation will be provided by the landowner who owns land on the upper reaches of the River Bure. Please refer to Annex 4 and Annex 5 of this letter which set out requirements for mitigation such as replacing septic tanks, land change and wetlands BMV Agricultural land Loss of agricultural land. Not specified what grade. Further advice on soils is in Annex 2 . Recreational disturbance and other issues Contributions to GIRAMS included in the policy. Natural England supports the delivery of multi-functional open space together with measures for its on-going maintenance.
Do you consider it necessary to participate in a public hearing session, should these be required?	

<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>File (where submitted)</p>	<p>Natural England - Annex 2.pdf Natural England - Annex 4.pdf Natural England - Annex 5.pdf</p>
<p>Officer Summary</p>	<p>Not in or near a National Landscape. The site is on the border of the Bure Broads and Marshes Nutrient Neutrality catchment area. As such any planning application will need to be accompanied with a HRA informed by a Nutrient Neutrality budget calculation and mitigation strategy. The Additional Sites Review Background Paper, page 33 states that mitigation will be provided by the landowner who owns land on the upper reaches of the River Bure. Please refer to Annex 4 and Annex 5 of this letter which set out requirements for mitigation such as replacing septic tanks, land change and wetlands.</p> <p>Loss of agricultural land. Not specified what grade. Further advice on soils is in Annex 2. Contributions to GIRAMS included in the policy. Natural England supports the delivery of multi-functional open space together with measures for its on-going maintenance.</p>
<p>Officer Response</p>	<p>Comments noted. The council has been engaging with the site promoters to determine what solutions in regard to Nutrient Neutrality are being pursued and how this impacts the site's deliverability.</p> <p>The site is within Grade 3 agricultural land, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. Briston & Melton Constable together are identified as a Large Growth Village in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.</p>

Local Plan Further Consultation: Schedule of Representations (Proposed Change 10-14)

Proposed Change 10 - Extended Site Allocation: Land South of School Road, Ludham (LUD01/C)

Section	Proposed Change 10 - Extended Site Allocation: Land South of School Road, Ludham (LUD01/C)
ID	FC98
Response Date	25/11/2024 15:15:00
Consultee Full Name	Ms Eleanor Roberts
Consultee Organisation	Senior Sustainable Development Officer Water Management Alliance
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Thank you for consulting the Water Management Alliance on the North Norfolk Proposed Submission Version (Regulation 19 Publication) Local Plan. The Parishes included in the Housing Allocation Plan have some lands located within the boundary of the Internal Drainage District (IDD) of the Broads (2006) Internal Drainage Board (IDB) and Norfolk Rivers Internal Drainage Board (IDB). The Board's Byelaws therefore apply to those lands.</p> <p>A copy of the Board's Byelaws for The Broads IDB can be accessed on our website (https://www.wlma.org.uk/uploads/BIDB_Byelaws.pdf), along with maps of the IDD (https://www.wlma.org.uk/uploads/84-BIDB_drainindex.pdf). A copy of the Board's Byelaws for Norfolk Rivers IDB can be accessed on our website (https://www.wlma.org.uk/uploads/NRIDB_Byelaws.pdf), along with maps of the IDD (https://www.wlma.org.uk/uploads/179-NRIDB_Index.pdf).</p> <p>In keeping with other WMA member Boards, the principal function of the Broads (2006) IDB and Norfolk Rivers IDB is to provide flood protection within the Board's area. Certain watercourses within the IDD have been designated as 'Adopted Watercourses' by the Board. The adoption of a watercourse is an acknowledgement by the Board that the watercourse is of arterial importance to the IDD and as such, will normally receive maintenance from the IDD.</p> <p>For clarity, Main Rivers within each IDB are regulated by the Environment Agency.</p> <p>The Board's rationale and approach towards managing flood risk and water levels within the IDD is set out in the WMA Group's Planning and Byelaw Strategy document (https://www.wlma.org.uk/uploads/WMA_Planning_and_Byelaw_Policy.pdf).</p> <p>The Board will comment on planning for all major developments (10 or more properties) within the IDD watershed that are likely to discharge surface water into a watercourse within the IDD. Under certain circumstances, some major developments outside the IDD boundary may also be regulated by the Board's byelaws. We request that the Board is consulted as any planning application comes forward relating to any of the identified allocation sites.</p> <p>In order to reduce potential conflict between the planning process and the Board's regulatory regime and consenting process please be aware of the points set out below.</p> <p>Sites within WMA Board IDD</p> <ul style="list-style-type: none"> • F10 Fakenham, Land South of Barons Close <p>This allocation site is partially within the Norfolk Rivers IDD, and I note the presence of a Board Adopted watercourse (DRN093G0101 – MN51 Fakenham) adjacent to the southern site boundary, as well as riparian watercourses to the east and west. For any future proposals at this site, please be aware of the following:</p> <ul style="list-style-type: none"> • Surface water disposal from new developments should be in line with the drainage hierarchy (as per best practice). • If surface water is proposed to be disposed of via infiltration, we would recommend that the proposed strategy is supported by ground investigation to determine the infiltration potential of the site and the depth to groundwater. If on-site material were to be considered favourable then we would advise infiltration testing in line with BREDigest 365 (or equivalent) to be undertaken to determine its efficiency. • If a surface water discharge is proposed to a watercourse, the proposed development will require land drainage consent in line with the Board's byelaws (specifically byelaw3). Any consent granted will likely be conditional, pending the payment of a Surface Water

Development Contribution fee, calculated in line with the Board's charging policy(https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf).

- The discharge of treated foul water to a watercourse within the IDD requires land drainage consent in line with the Board's byelaws (specifically byelaw 3).
- Any works within 9 metres of a Board adopted watercourse will require consent to relax Byelaw 10 (no obstructions within 9 metres of the edge of drainage or flood risk management infrastructure).
- If development proposals involve works to alter a Board Adopted watercourse, consent is required under Section 23 of the Land Drainage Act 1991 (and byelaw 4).
- Should any development proposals include works to alter a riparian watercourse(including culverting for access), consent will be required under Section 23 of the Land Drainage Act 1991 (and byelaw 4). The Board is responsible for consenting this activity within the IDD, while Norfolk County Council (the Lead Local Flood Authority) is the regulatory body outside the boundary of the IDD.

Sites outside WMA Board IDD with potential to negatively impact the IDD

- C22/2, Cromer, Land West of Pine Tree Farm
- F01/B, Fakenham, Land North of Rudham Stile Lane
- F02, Fakenham, Land Adjacent Petrol Filling Station
- F03, Fakenham, Land at Junction of A148 & B1146
- LUD01/A, Ludham, Land South of School Road
- NW01/B, North Walsham, Land at Norwich Road & Nursery Drive
- NW62/A, North Walsham, Land West of North Walsham
- E7, Tattersett, Tattersett Business Park

The above sites lie outside the Norfolk Rivers IDB's IDD, however have the potential to significantly impact the Board's district should a surface water discharge be proposed. We recommend that as each of these sites prepares to apply for planning permission, they ensure their drainage proposals are designed in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4 and with the input of the IDB. It is possible that consent will be required from the Board for surface water discharge from these sites. It is likely that significant improvement works will be required in the receiving catchments of these developments in order to accept resultant additional flows downstream, for the purpose of reducing flood risk upstream and we would welcome discussion as early as possible to come to any necessary agreements to reduce flood risk in both the Board's IDD downstream and new development upstream.

At this stage our advice for surface water drainage design is as follows:

- Surface water disposal from new developments should be in line with the drainage hierarchy (as per best practice).
- We recommend that a drainage strategy is supplied which has been considered in line with the Planning Practice Guidance SuDS discharge location hierarchy.
- If it is proposed that a site disposes of surface water via infiltration, we recommend that the viability of this proposal is evidenced by ground investigation followed by infiltration testing in line with BRE Digest 365.
- If a surface water discharge is proposed to a watercourse within the watershed catchment of the Board's IDD then we request that this be in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible.
- Should any development proposals include works to alter a riparian watercourse (including culverting for access), consent will be required under Section 23 of the Land Drainage Act 1991. The Board is responsible for consenting this activity within the IDD, while Norfolk County Council (the Lead Local Flood Authority) is the regulatory body outside the boundary of the IDD.

Sites outside WMA Board IDD less likely to negatively impact the IDD

- BLA04/A, Blakeney, Land East of Langham Road
- BRI01, Briston, Land East of Astley Primary School
- BRI02, Briston, Land West of Astley Primary School
- C07/2, Cromer, Land at Cromer High Station
- C16, Cromer, Former Golf Practice Ground, Overstrand Road
- H17, Holt, Land North of Valley Lane
- H20, Holt, Land at Heath Farm
- H27/1, Holt, Land at Heath Farm
- HV01/B*, Hoveton, Land East of Tunstead Road
- LUD06/A, Ludham, Land at Eastern End of Grange Road
- NW52, North Walsham, Land East of Bradfield Road
- MUN03/B, Mundesley, Land off Cromer Road & Church Lane
- SH04, Sheringham, Land Adjoining Seaview Crescent
- SH07, Sheringham, Former Allotments, Weybourne Road, Adjacent to 'The Reef'

	<ul style="list-style-type: none"> • SH18/1B, Sheringham, Land South of Butts Lane • ST19/A*, Stalham, Land Adjacent Ingham Road • ST23/2*, Stalham, Land North of Yarmouth Road, East of Broadbeach Gardens • W01/1, Wells-next-the-Sea, Land South of Ashburton Close • W07/1, Wells-next-the-Sea, Land Adjacent Holkham Road <p>*We would expect to see successful infiltration in this location as per other recent local developments.</p> <p>For the above sites, we have no initial concerns, however as stated above we would request that the WMA is consulted on any forthcoming planning applications at these sites. Our standing advice at this stage is as follows:</p> <ul style="list-style-type: none"> • Surface water disposal from new developments should be in line with the drainage hierarchy (as per best practice). • We recommend that a drainage strategy is supplied which has been considered in line with the Planning Practice Guidance SuDS discharge location hierarchy. • If it is proposed that a site disposes of surface water via infiltration, we recommend that the viability of this proposal is evidenced by ground investigation followed by infiltration testing in line with BRE Digest 365. • If a surface water discharge is proposed to a watercourse within the watershed catchment of the Board's IDD then we request that this be in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible. • Should any development proposals include works to alter a riparian watercourse (including culverting for access), consent will be required under Section 23 of the Land Drainage Act 1991. The Board is responsible for consenting this activity within the IDD, while Norfolk County Council (the Lead Local Flood Authority) is the regulatory body outside the boundary of the IDD. <p>Whilst the consenting process as set out under the Land Drainage Act 1991 and the aforementioned Byelaws are separate from planning, the ability to implement a planning permission may be dependent on the granting of these consents. As such we strongly recommend that developers seek the necessary consent prior to determination of a planning application. The Board's officers are available to respond to queries and provide advice.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	Site LUD01/C is included in the table as a 'Sites outside WMA Board IDD with potential to negatively impact the IDD'.
Officer Response	Note: This response is an identical repeat of the WMA draft Local Plan Regulation 19 stage consultation response with the exception that site LUD01/C is included in the table as a 'Sites outside WMA Board IDD with potential to negatively impact the IDD'. Comments noted.
Section	Proposed Change 10 - Extended Site Allocation: Land South of School Road, Ludham (LUD01/C)
ID	FC102
Response Date	28/11/2024 09:00:00
Consultee Full Name	Mr & Mrs Ronald & Jennifer Seaton
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	We are writing to express our concerns over the proposed development of 60 dwellings on the field immediately adjoining our garden hedge at 58 School Road Ludham. The field lies between Pound Lane and Willow Way with School Road and Norwich Road forming the other two sides.

	<p>1) Privacy of our house and garden will be compromised seriously affecting our retirement leisure time.</p> <p>2) The resulting noise level from construction works and accompanying traffic will shatter what peace we now have.</p> <p>3) Surrounding roads are totally inadequate to cope with extra traffic. Pound lane and School Road forming two sides of the field are only wide enough for one vehicle at a time. Willow Way Estate would become subject to far too much traffic. Leaving only the very busy Norwich Road to exit this new estate which would prove very dangerous.</p> <p>4) The long running and much documented problem of overflowing drainage from the field flooding the gardens on Willow Way and the often overflowing Sewage flooding the same areas have never been addressed. This proposal can only add greatly to this problem that nobody seems to care about apart from those unlucky enough to have to suffer it. As an environmental issue this can only have an adverse effect on peoples health, many of whom are elderly and vulnerable. We believe Anglian Water have stated that they do not intend to upgrade the existing pipe-works to deal either with the current problem or to cope with the proposed extra sewage which must increase substantially. What will be done to alleviate this problem.</p> <p>5) Our Primary school is full to capacity with a waiting list for infants now. Where are proposed new families meant to send their children?</p> <p>6) Our Doctors surgery is now so over-prescribed as to be almost impossible to get an appointment to see an actual Doctor. There is already a waiting time of several weeks.</p> <p>7) This new development will seriously de-value the surrounding properties as the lovely view over the fields will be obliterated.</p> <p>8) The original proposal was for 15 dwellings including some "affordable" housing but this was then reduced to 12 with NO affordable housing following a proposed payment to the council. Will there be a clause preventing these from becoming second homes or holiday lets. What is the current proposal for "affordable" housing for our young villagers? Our village community is in danger of becoming lost forever as we will become a mini town full of full or part-time strangers.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>Include files</p>	
<p>Officer Summary</p>	<p>Object: Privacy of our house and garden will be compromised seriously affecting our retirement leisure time. The resulting noise level from construction works and accompanying traffic will shatter what peace we now have. Surrounding roads are totally inadequate to cope with extra traffic. Pound lane and School Road forming two sides of the field are only wide enough for one vehicle at a time. Willow Way Estate would become subject to far too much traffic. Leaving only the very busy Norwich Road to exit this new estate which would prove very dangerous. The long running and much documented problem of overflowing drainage from the field flooding the gardens on Willow Way and the often overflowing Sewage flooding the same areas have never been addressed. This proposal can only add greatly to this problem that nobody seems to care about apart from those unlucky enough to have to suffer it. Our Primary school is full to capacity with a waiting list for infants now. Our Doctors surgery is now so over-prescribed as to be almost impossible to get an appointment to see an actual Doctor. This new development will seriously de-value the surrounding properties as the lovely view over the fields will be obliterated. The original proposal was for 15 dwellings including some "affordable" housing but this was then reduced to 12 with NO affordable housing following a proposed payment to the council.</p>
<p>Officer Response</p>	<p>Comments noted. Access onto Norwich Road is achievable and the suitability of access to Willow Way is established through the already granted permission for 12 dwellings. Vehicular access to the extension will be from Norwich Road only with pedestrian only links to the permitted development site.</p> <p>Through ongoing consultation with Anglian Water, the site-specific policy includes a requirement to provide a Foul Drainage Strategy, including how additional foul flows will be accommodated within the foul sewerage network and demonstrate that there is adequate capacity at the Water Recycling Centre. This is in addition to off-site mains reinforcement, and the provision of a project level HRA which addresses issues relating to sewerage infrastructure and hydrological issues to demonstrate adequate safeguards are in place to</p>

	<p>rule out adverse effects on the integrity of the protected sites. The site will also be required to produce a Flood Risk Assessment completion of any necessary flood mitigation measures.</p> <p>Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (C4, Page 25). The DWMP makes reference to Ludham and identifies multiple solutions for the Ludham-Walton Hall WRC. Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well. Opportunities to provide for local infrastructure beyond what is included within the site-specific policy will be explored through the application process.</p>
Section	Proposed Change 10 - Extended Site Allocation: Land South of School Road, Ludham (LUD01/C)
ID	FC115
Response Date	29/11/2024 09:00:00
Consultee Full Name	Marnie Hammond
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I feel that the complaints of the residents haven't been addressed as we still have serious water and sewage flooding issues resulting in our gardens becoming waterlogged and covered in sewage which is obviously a health hazard. How is the totally inadequate current sewage and water run off problem supposed to cope with the outflow from 60 proposed new residences. It is my understanding that Anglian Water have said they will not be putting in any new infrastructure to alleviate this already failing system, so where does that leave the residents of Willow way?</p> <p>The proposed field under review is above the surrounding land including School Road and Willow Way so any run off flows downhill onto our properties and more houses will obviously mean more run off with nowhere else to go.</p> <p>Regarding the access to and from this proposed site I feel that neither School Road, Willow Way, Norwich Road or Pound Lane is suitable to exit onto safely. School Road and Pound Lane are only Single vehicle width at this point and cause hold ups now if two vehicles meet in opposite directions.</p> <p>As our local Primary School is already full to capacity now with a waiting list where are any new children supposed to go.</p> <p>Our Doctor's Surgery now is so crowded that to get an appointment you are subject to a very long wait if you get to see a Doctor at all. How will they cope with a system already under enormous pressure and what will that mean for it's current patients?</p> <p>How many of these proposed dwellings will be affordable housing for the village's young people? Our village is losing it's character now and myself and a great many of the local residents are dismayed now at the amount of empty Holiday and Second homes there are already here. Our village community is in danger of disappearing if we now become a Mini Town. Where is the benefit to us as a village? My privacy is also a worry to me as I have for several years enjoyed an uninterrupted view across the fields and as a senior citizen I spend a considerable amount of time in my conservatory gazing out. Apart from seriously detracting from my enjoyment and peace of mind in my twilight years this will have the effect of de-valuing my property and the same can be said for my neighbours whose properties also border the field.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	

Officer Summary	<p>Object: complaints of the residents haven't been addressed as we still have serious water and sewage flooding issues resulting in our gardens becoming waterlogged and covered in sewage which is obviously a health hazard. How is the totally inadequate current sewage and water run off problem supposed to cope with the outflow from 60 proposed new residences. It is my understanding that Anglian Water have said they will not be putting in any new infrastructure to alleviate this already failing system, so where does that leave the residents of Willow way? The proposed field under review is above the surrounding land including School Road and Willow Way so any run off flows downhill onto our properties and more houses will obviously mean more run off with nowhere else to go.</p> <p>Regarding the access to and from this proposed site I feel that neither School Road, Willow Way, Norwich Road or Pound Lane is suitable to exit onto safely. School Road and Pound Lane are only Single vehicle width at this point and cause hold ups now if two vehicles meet in opposite directions.</p> <p>As our local Primary School is already full to capacity, Our Doctor's Surgery now is so crowded. How many of these proposed dwellings will be affordable housing for the village's young people? Our village is losing it's character now and myself and a great many of the local residents are dismayed now at the amount of empty Holiday and Second homes there are already here. Our village community is in danger of disappearing if we now become a Mini Town.</p>
Officer Response	<p>Comments noted. Through ongoing consultation with Anglian Water, the site-specific policy includes a requirement to provide a Foul Drainage Strategy, including how additional foul flows will be accommodated within the foul sewerage network and demonstrate that there is adequate capacity at the Water Recycling Centre. This is in addition to off-site mains reinforcement, and the provision of a project level HRA which addresses issues relating to sewerage infrastructure and hydrological issues to demonstrate adequate safeguards are in place to rule out adverse effects on the integrity of the protected sites. The site will also be required to produce a Flood Risk Assessment completion of any necessary flood mitigation measures.</p> <p>Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (Examination Library document C4, Page 25). The DWMP makes reference to Ludham and identifies multiple solutions for the Ludham-Walton Hall WRC. Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.</p> <p>Access onto Norwich Road is achievable and the suitability of access to Willow Way is established through the already granted permission for 12 dwellings. Vehicular access to the extension will be from Norwich Road only with pedestrian only links to the permitted development site. Ludham is identified as a Large Growth Village in the Settlement Hierarchy and is a sustainable location for growth as set out in Policy SS1. Opportunities to provide for local infrastructure beyond what is included within the site-specific policy will be explored through the application process.</p>
Section	Proposed Change 10 - Extended Site Allocation: Land South of School Road, Ludham (LUD01/C)
ID	FC190
Response Date	09/12/2024 13:10:12
Consultee Full Name	Mr Neil Burrows
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Residents in this area already suffer from overflowing sewage during heavy rain, this development would make the situation far worse. 12 houses have already been given permission for this site, please note there are no affordable houses included in this figure which is another issue.</p> <p>Traffic, especially during the summer season is already bad with roads in very poor condition. Cycling in the area is extremely dangerous with no street lights, (we don't want any), single track or narrow, bendy roads with potholes - no cycle lanes or space for them. Public transport is sparse, expensive and unreliable which makes it hard to find work without a car, there is</p>

	<p>very little work locally so a car is essential. Plus these schemes never have enough parking spaces or garages large enough for a modern car.</p> <p>I know you won't listen to locals and this consultation is just a sop to us, but we won't give up so you, and any developer will have a fight on their hands.</p> <p>Far too much farm land is being used for developments, we need this land to grow crops to eat!</p> <p>It also appears the Governemnt is doing virtually nothing to address the reason why we need so many new houses??</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	<p>Object: Residents in this area already suffer from overflowing sewage during heavy rain, this development would make the situation far worse. 12 houses have already been given permission for this site, please note there are no affordable houses included in this figure which is another issue.</p> <p>Traffic, especially during the summer season is already bad with roads in very poor condition. Cycling in the area is extremely dangerous with no street lights, (we don't want any), single track or narrow, bendy roads with potholes - no cycle lanes or space for them. Public transport is sparse, expensive and unreliable which makes it hard to find work without a car, there is very little work locally so a car is essential. Plus these schemes never have enough parking spaces or garages large enough for a modern car. Far too much farm land is being used for developments.</p>
Officer Response	<p>Comments noted. Through ongoing consultation with Anglian Water, the site-specific policy includes a requirement to provide a Foul Drainage Strategy, including how additional foul flows will be accommodated within the foul sewerage network and demonstrate that there is adequate capacity at the Water Recycling Centre. This is in addition to off-site mains reinforcement, and the provision of a project level HRA which addresses issues relating to sewerage infrastructure and hydrological issues to demonstrate adequate safeguards are in place to rule out adverse effects on the integrity of the protected sites. The site will also be required to produce a Flood Risk Assessment completion of any necessary flood mitigation measures.</p> <p>Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (Examination Library document C4, Page 25). The DWMP makes reference to Ludham and identifies multiple solutions for the Ludham-Walton Hall WRC. Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.</p> <p>Access onto Norwich Road is achievable and the suitability of access to Willow Way is established through the already granted permission for 12 dwellings. Vehicular access to the extension will be from Norwich Road only, with pedestrian links to the permitted development site and onto School Road and Willow Way.</p>
Section	Proposed Change 10 - Extended Site Allocation: Land South of School Road, Ludham (LUD01/C)
ID	FC214
Response Date	10/12/2024 19:46:43
Consultee Full Name	Paul Booty
Consultee Organisation	

Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Firstly, I am of the belief that this 'extra' land has been added in because the Trust who own the field are unable to find a developer to take on the land with existing planning permission as granted. This is because there is simply not enough profit given the infrastructure requirements. For this reason the additional land has been added on an ad hoc basis with no real thought to how you can go from 12 homes to 60 by doubling the available land.</p> <p>Further there has been no thought given to land in a more suitable position (E.g. Grange road and or Catfield airfield, the latter being brown field).</p> <p>In any event dealing with the land in question, I have the following comments:</p> <ol style="list-style-type: none"> 1) The electricity supply. My understanding is the supply to Ludham comes via Yarmouth and Horning. Both supply lines are almost a century old and unable to cope with the existing requirements let alone additional requirements of such a development. 2) The sewerage system. Again this is not adequate with frequent sewerage backing up into the homes on Willow Way. Despite assurances from Anglian Water nothing has been done to upgrade the drains. 3) Run off water from the land. Given climate change and its reality this will exacerbate over time. Water flows downhill. Currently Pikes Nursery bears the brunt of the runoff from the field with severe flooding to several homes. Willow Way does not escape either. By making half the field developed with no natural ground so soak rainfall this will devastate those properties currently suffering and increase the number of affected properties. 4) The doctors surgery. Currently very full without the ability to cope with the additional patients that this proposal would bring to its doors. 5) Similarly the school has about 15 places left in its capacity. There is no room in the school for more pupils. 6) Proposed entrance to the estate via Norwich Road. This is a busy and narrow A road and the access way (even if it is big enough to become a junction with allied footpath - which I doubt) it will create further issues for traffic on Norwich Road. This is the main road through Ludham and the introduction of more traffic will potentially be very dangerous so close to Pikes Nursery and the corner by the butchers. 7) The proposed entrance to the estate will be over a flood plane (presumably why it was labelled open land as you cant build on it). I do not believe the land itself would withstand continued use of traffic. 8) The proposed extension also would be over a current public right of way, enjoyed by walkers all year round, even though the exit is not maintained by the land owners. This right of way would be lost. <p>For all the above reasons this proposal ought to be abandoned.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	To ensure correct procedures are followed and that all opinions are properly heard
Include files	
Officer Summary	<p>Object: Further there has been no thought given to land in a more suitable position (E.g. Grange road and or Catfield airfield, the latter being brown field). The electricity supply. My understanding is the supply to Ludham comes via Yarmouth and Horning. Both supply lines are almost a century old and unable to cope with the existing requirements let alone additional requirements of such a development. The sewerage system. Again this is not adequate with frequent sewerage backing up into the homes on Willow Way. Despite assurances from Anglian Water nothing has been done to upgrade the drains. Run off water from the land. Given climate change and its reality this will exacerbate over time. Water flows downhill. Currently Pikes Nursery bears the brunt of the runoff from the field with severe flooding to several homes. Willow Way does not escape either. By making half the field developed with no natural ground so soak rainfall this will devastate those properties currently suffering and increase the number of affected properties. The doctors surgery. Currently very full without the ability to cope with the additional patients that this proposal would bring to its doors. Similarly the school has about 15 places left in its capacity. There is no room in the school for more pupils. Proposed entrance to the estate via Norwich Road. This is a busy and narrow A road and the access way (even if it is big enough to become a junction with allied footpath - which I doubt) it will create further issues for traffic on Norwich Road. The proposed entrance to the estate will be over a flood plane (presumably why it was labelled</p>

	open land as you cant build on it). I do not believe the land itself would withstand continued use of traffic. The proposed extension also would be over a current public right of way, enjoyed by walkers all year round, even though the exit is not maintained by the land owners. This right of way would be lost.
Officer Response	<p>Comments noted. The proposed allocation at Grange Road (LUD06/A) was discussed at the previous hearing sessions in January - March 2023 where it was concluded that the site should be removed from the list of allocations in the Local Plan due to uncertainty regarding its delivery. However, the Settlement Boundary for Ludham will be redrawn to include this site to allow for any future possible infill development. This will be set out in the Council list of Main Modifications to the Local Plan.</p> <p>The Council has a Brownfield Register, there are not enough sites on this register to accommodate the required growth needed as set out in Policy SS1. Through ongoing consultation with Anglian Water, the site-specific policy includes a requirement to provide a Foul Drainage Strategy, including how additional foul flows will be accommodated within the foul sewerage network and demonstrate that there is adequate capacity at the Water Recycling Centre. This is in addition to off-site mains reinforcement, and the provision of a project level HRA which addresses issues relating to sewerage infrastructure and hydrological issues to demonstrate adequate safeguards are in place to rule out adverse effects on the integrity of the protected sites. The site will also be required to produce a Flood Risk Assessment completion of any necessary flood mitigation measures.</p> <p>Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (Examination Library document C4, Page 25). The DWMP makes reference to Ludham and identifies multiple solutions for the Ludham-Walton Hall WRC. Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.</p> <p>Access onto Norwich Road is achievable and the suitability of access to Willow Way is established through the already granted permission for 12 dwellings. Vehicular access to the extension will be from Norwich Road only, with pedestrian links to the permitted development site and onto School Road and Willow Way. As shown on mapping, the ROW links Pound Lane to Norwich Road, however, there is no formal connection to the ROW on Pound Lane except for a gap in the hedgerow in the North-Western corner of the field which is not the correct access point, and there is no connection to it on Norwich Road, the ROW also appears to intersect through residential properties. The proposed allocation will divert the ROW through a new route from Norwich Road to the North-Western corner of the field at the Pound Lane/School Road Junction, in addition to alternative and accessible pedestrian links throughout the site, providing a connection from Norwich Road to Willow Way and School Road.</p>
Section	Proposed Change 10 - Extended Site Allocation: Land South of School Road, Ludham (LUD01/C)
ID	FC224
Response Date	14/12/2024 06:48:00
Consultee Full Name	Mr Sean Glynn
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I have a number of concerns regarding the proposed additional development south of School road, Ludham LUD01/C.</p> <p>I am concerned about loss of habitat and light pollution that could affect the local wildlife,</p> <ul style="list-style-type: none"> - Bats, additional light and noise pollution would disturb their nesting and affect the local habitat. - deer who frequently cut through my property to access the fields across Norwich road - the disruptive increase in light impacting the nocturnal birds hunting patterns -the <p>Drainage and Sewerage</p>

- There is already an existing problem in Willow way with raw sewage in residents gardens. How is additional housing going in to the same network going to alleviate this.
- horning broad has suffered inexcusable raw sewage being pumped into it when drains can't cope despite bill rises by anglian water. Additional housing will make this worse and destroy the broads fragile ecosystem. Anglian water say they will provide additional funding to cope with this but by current information on increases in sewage discharges last year does the council really believe they will deliver a sustainable plan of works.
- sewage drains from properties on Norwich road run across the field. With the proposed planning works I have serious concerns this will adversely affect/ damage these existing drains.
- Backing up of drains is already an issue at Pikes Nursery and Willow way
- flooding is already an issue in several parts of the village. Building works will create more surface water and add existing pressure to a system that cannot cope at the moment.

Local area

- there are currently no dentists in the area accepting new NHS patients. How is an increase in population going to access dental health
- Pressure on schools/ doctors. The doctors is already under huge pressure and additional patients will add additional strain.
- traffic past Ludham school and parking in and around the village borders on the dangerous at times. More homes would mean more traffic on an infrastructure that struggles to cope as it.
- Speeding concerns on Norwich road. Traffic should be travelling through the village at 30mph. This is not the case with excessive speed witnessed throughout the day. Additional traffic will make this worse unless adequate speed calming measures/police presence is funded.

Public transport links and sustainability

- Inadequate public transport links means new residents would need cars. Completely against the countries targets to achieve CNZ and lower green house gas emissions.
- sustainability, how is the carbon emissions of the building works going to be offset. How does this comply with the governments sustainability and CNZ plans?

Planning presidence

- Restrictions on planning, when we went for an extension we were refused double height due to alledged overdevelopment of our site, lighting had to point downwards to avoid light pollution, no black cladding, hope same restrictions apply to new development as this will limit number of homes that can be built on the land. Our plot is 1/3rd acre with one resident. By the presidence set, planning should only be granted (maximum) for 1 home every 3rd of an acre with no double height.
- there is a right of way across the development area which we use when walking out kids around the village. With a focus on well being, how is a loss of rights of way supporting people's mental health when they cannot access the local environment.
- loss of agricultural space

I doubt this will make any difference but I hope these concerns are addressed with substantive plans and companies like Anglian water held financially and legally to account when what they promise is potentially not delivered.

Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	Because the companies involved in the building and the council need to listen to peoples concerns, adequate mitigate them and be held personally accountable for their decisions.
Include files	
Officer Summary	Object: Bats, additional light and noise pollution would disturb their nesting and affect the local habitat. deer who frequently cut through my property to access the fields across Norwich road. already an existing problem in Willow way with raw sewage in residents gardens. How is additional housing going in to the same network going to alleviate this. horning broad has suffered inexcusable raw sewage being pumped into it when drains can't cope despite bill rises by anglian water. Additional housing will make this worse and destroy the broads fragile ecosystem. flooding is already an issue in several parts of the village. there are currently no

	dentists in the area accepting new NHS patients. Pressure on schools/ doctors. traffic past Ludham school and parking in and around the village borders on the dangerous at times. Inadequate public transport links means new residents would need cars. sustainability, how is the carbon emissions of the building works going to be offset.
Officer Response	<p>Comments noted. The site-specific policy includes requirements for high-quality landscaping to help mitigate impacts on the landscape and biodiversity.</p> <p>Through ongoing consultation with Anglian Water, the site-specific policy includes a requirement to provide a Foul Drainage Strategy, including how additional foul flows will be accommodated within the foul sewerage network and demonstrate that there is adequate capacity at the Water Recycling Centre. This is in addition to off-site mains reinforcement, and the provision of a project level HRA which addresses issues relating to sewerage infrastructure and hydrological issues to demonstrate adequate safeguards are in place to rule out adverse effects on the integrity of the protected sites. The site will also be required to produce a Flood Risk Assessment completion of any necessary flood mitigation measures.</p> <p>Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (Examination Library document C4, Page 25). The DWMP makes reference to Ludham and identifies multiple solutions for the Ludham-Walton Hall WRC. Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.</p>
Section	Proposed Change 10 - Extended Site Allocation: Land South of School Road, Ludham (LUD01/C)
ID	FC226
Response Date	12/12/2024 14:21:00
Consultee Full Name	Mrs Marilyn Biggs
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	I will be objecting to the planning request for permission for 60 houses to be built on inappropriate land in Ludham which already suffers from sewage problems and flooding. The access to the sites are also completely inappropriate and one even goes on to a road that doesn't actually exist. Pound Road is nowhere in Ludham, I looked for it from Pound Lane but couldn't find it anywhere and I live here!!! I would like you to put this forward on to the appropriate papers and ensure they are added to the considerations for the planning application.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	Object: objecting to the planning request for permission for 60 houses to be built on inappropriate land in Ludham which already suffers from sewage problems and flooding. The access to the sites are also completely inappropriate and one even goes on to a road that doesn't actually exist. Pound Road is nowhere in Ludham,
Officer Response	Comments noted. Through ongoing consultation with Anglian Water, the site-specific policy includes a requirement to provide a Foul Drainage Strategy, including how additional foul flows will be accommodated within the foul sewerage network and demonstrate that there is adequate capacity at the Water Recycling Centre. This is in addition to off-site mains reinforcement, and the provision of a project level HRA which addresses issues relating to sewerage infrastructure and hydrological issues to demonstrate adequate safeguards are in

	<p>place to rule out adverse effects on the integrity of the protected sites. The site will also be required to produce a Flood Risk Assessment completion of any necessary flood mitigation measures.</p> <p>Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (Examination Library document C4, Page 25). The DWMP makes reference to Ludham and identifies multiple solutions for the Ludham-Walton Hall WRC. Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.</p> <p>Access onto Norwich Road is achievable and the suitability of access to Willow Way is established through the already granted permission for 12 dwellings. Vehicular access to the extension will be from Norwich Road only, with pedestrian links to the permitted development site and onto School Road and Willow Way. The site-specific policy correctly references Pound Lane.</p>
Section	Proposed Change 10 - Extended Site Allocation: Land South of School Road, Ludham (LUD01/C)
ID	FC247
Response Date	13/12/2024 11:45:00
Consultee Full Name	Mrs & Mr Georgina & Matthew Henderson & Key
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I would oppose any more development on that site on the grounds of there being no infrastructure in the village to support that amount of housing.</p> <p>For instance the single lane roads would cause problems for extra traffic. The access points to the development are on single carriageway lanes, and then access to the Norwich Road would be very dangerous. We are also concerned about the surface water drainage which already is more than our pump houses can manage.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	<p>Object: I would oppose any more development on that site on the grounds of there being no infrastructure in the village to support that amount of housing. For instance the single lane roads would cause problems for extra traffic. The access points to the development are on single carriageway lanes, and then access to the Norwich Road would be very dangerous. We are also concerned about the surface water drainage which already is more than our pump houses can manage.</p>
Officer Response	<p>Comments noted. Opportunities to provide for local infrastructure beyond what is included within the site-specific policy will be explored through the application process. Access onto Norwich Road is achievable and the suitability of access to Willow Way is established through the already granted permission for 12 dwellings. Vehicular access to the extension will be from Norwich Road only, with pedestrian links to the permitted development site and onto School Road and Willow Way.</p> <p>Through ongoing consultation with Anglian Water, the site-specific policy includes a requirement to provide a Foul Drainage Strategy, including how additional foul flows will be accommodated within the foul sewerage network and demonstrate that there is adequate capacity at the Water Recycling Centre. This is in addition to off-site mains reinforcement, and the provision of a project level HRA which addresses issues relating to sewerage</p>

	<p>infrastructure and hydrological issues to demonstrate adequate safeguards are in place to rule out adverse effects on the integrity of the protected sites. The site will also be required to produce a Flood Risk Assessment completion of any necessary flood mitigation measures.</p> <p>Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (Examination Library document C4, Page 25). The DWMP makes reference to Ludham and identifies multiple solutions for the Ludham-Walton Hall WRC. Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.</p>
Section	Proposed Change 10 - Extended Site Allocation: Land South of School Road, Ludham (LUD01/C)
ID	FC249
Response Date	17/12/2024 16:16:57
Consultee Full Name	Mrs Kathleen Bugden
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>No. Ref. Convenient pedestrian link available to primary school, recreation ground* and general store.</p> <p>Comment: Pedestrian link to recreation ground would entail crossing the busy A1062 road. There is no footpath directly opposite Pound Lane as this is situated at a cross roads (View map of village and location of recreation field at the village hall and also at Womack Staithe in relation to proposed site.)</p> <p>Since making this comment, Councillor Adam Varley has confirmed that the word "recreation ground" mentioned in the proposal refers to the Children's Playground and a recreation area within the infant school grounds. I would argue that the 'two' recreation grounds in Ludham are a) the Recreation and Football Ground adjacent to the village hall along the Norwich Road and b) the two greens at Womack Staithe in Horsefen Road. Access to both from the proposed site would entail crossing the A1062 where there are currently no pedestrian crossings. There is also a lack of footpaths in some parts for access routes to both of these recreation areas. As an 'A-Road' is involved, my concern is for safety and I believe that an assessment should be carried out by Norfolk County Council before any permission is given to build houses where children live. Although not linked in any way to the recreation areas, in 2014 a 12 year old child ran out onto the A1062 and was tragically killed on the A1062 at Johnson Street.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	<p>Object: Pedestrian link to recreation ground would entail crossing the busy A1062 road. There is no footpath directly opposite Pound Lane as this is situated at a cross roads (View map of village and location of recreation field at the village hall and also at Womack Staithe in relation to proposed site. I would argue that the 'two' recreation grounds in Ludham are a) the Recreation and Football Ground adjacent to the village hall along the Norwich Road and b) the two greens at Womack Staithe in Horsefen Road. Access to both from the proposed site would entail crossing the A1062 where there are currently no pedestrian crossings. There is also a lack of footpaths in some parts for access routes to both of these recreation areas.</p>
Officer Response	Comments noted. There is no requirement in the site-specific policy to provide a pedestrian to the recreation ground on the A1062. The site is required to provide pedestrian access to

	School Road and will also provide a pedestrian access onto Willow Way to promote active travel from the site to the centre of the settlement.
Section	Proposed Change 10 - Extended Site Allocation: Land South of School Road, Ludham (LUD01/C)
ID	FC275
Response Date	14/12/2024 10:32:00
Consultee Full Name	Richard Pinning
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Development of 60 houses (including 12 proposes) between school Road and Norwich Road Ludham Norfolk</p> <p>Potential problems raised as objections to this development.</p> <p>a) Access and exits to this site on narrow roads and lanes (School Road and Pound Lane)</p> <p>b) School entrance presents safety problems from current and increases traffic movements.</p> <p>c) Any further exits onto Norwich Road would create another accident area because of through traffic on a narrow section without footpaths.</p> <p>d) There is a Public Footpath that runs diagonally across the proposed development from Pound Lane.</p> <p>e) Issues from foul and surface water for residents in Willow Way which must be addressed and improved to stop flooding and sewerage from increases volumes from any new development.</p> <p>f) The proposed development is on a wet and water laden field which has had bore holes placed across it and backfilled with ballast to try and improve drainage. However water still flows from the field onto roads in Willow Way. Are these ballast bore holes sound enough to build on?</p> <p>The above points have been raised as an objection for the consultancy document for development between School Road and Norwich Road Ludham Norfolk.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	<p>Object: Access and exits to this site on narrow roads and lanes (School Road and Pound Lane). School entrance presents safety problems from current and increases traffic movements. Any further exits onto Norwich Road would create another accident area because of through traffic on a narrow section without footpaths. There is a Public Footpath that runs diagonally across the proposed development from Pound Lane. Issues from foul and surface water for residents in Willow Way which must be addressed and improved to stop flooding and sewerage from increases volumes from any new development. The proposed development is on a wet and water laden field which has had bore holes placed across it and backfilled with ballast to try and improve drainage. However water still flows from the field onto roads in Willow Way.</p>
Officer Response	<p>Access onto Norwich Road is achievable and the suitability of access to Willow Way is established through the already granted permission for 12 dwellings. Vehicular access to the extension will be from Norwich Road only, with pedestrian links to the permitted development site and onto School Road and Willow Way. The site will provide pedestrian access that connects to existing footpaths to encourage active travel to areas such as the school.</p> <p>Through ongoing consultation with Anglian Water, the site-specific policy includes a requirement to provide a Foul Drainage Strategy, including how additional foul flows will be accommodated within the foul sewerage network and demonstrate that there is adequate capacity at the Water Recycling Centre. This is in addition to off-site mains reinforcement, and the provision of a project level HRA which addresses issues relating to sewerage</p>

	<p>infrastructure and hydrological issues to demonstrate adequate safeguards are in place to rule out adverse effects on the integrity of the protected sites. The site will also be required to produce a Flood Risk Assessment completion of any necessary flood mitigation measures.</p> <p>Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (Examination Library document C4, Page 25). The DWMP makes reference to Ludham and identifies multiple solutions for the Ludham-Walton Hall WRC. Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.</p>
Section	Proposed Change 10 - Extended Site Allocation: Land South of School Road, Ludham (LUD01/C)
ID	FC351
Response Date	16/12/2024 22:39:00
Consultee Full Name	Miss Joanne Read
Consultee Organisation	Founder/Chair Person Ludham Says No
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILE
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	Ludham Says No REDACTED.pdf
Officer Summary	<p>Object: Disappointed with the standard of the consultation, as we felt it was messy and very amateurish. We didn't feel it adhered to compliance, as many people in the village were still unaware of the proposed development. This presents non-compliance with other council planning policies and government planning guidance. The details were in the Ludham parish news; however, they were on the back page and not easily visible. In addition, the information provided was very basic and required online access for further details. The consultation process has not been conducted fairly or in an accessible way. Many individuals lack internet access, which hampers equitable participation. Additionally, the needs of individuals with disabilities, who require reasonable adjustments, have not been considered, potentially leading to discrimination under the Equality Act 2010.</p> <p>We seek clarification on how Anglian Water plans to address the historical sewage issues that have raised health and safety concerns for residents. Anglian Water has highlighted concerns at Ludham in this document - https://www.anglianwater.co.uk/SysSiteAssets/household/about-us/dwmp/dwmp-1.pdf Page - 52 it states "The long-term strategy includes infiltration reduction and 25% surface water removal as a solution to address the pollution risk, internal and external sewer flooding risk and the DWF compliance risk at the WRC". Has this been addressed?</p> <p>No street lights in Ludham. people could be at risk of a traffic accident as it's pitch black. No questions were answered concerning controlling increased surface water runoff which will compound already serious flooding issues, heavy clay soil will retain water. There were no questions answered in respect of minimising the risks and effects of land instability on property. With the existing pumping stations in Ludham not working to full capacity or already at capacity, they did not answer questions about what they will do to increase the capacity of these pumping stations. Infrastructure and the public – we have concerns about the impact the proposed works could have on the stability of our properties and the surroundings.</p>

We had no answer to your agenda on this topic. Regarding limited places at the school, already stretched services at the doctors' medical centre, and parking issues in the village, there are no parking restrictions in Ludham, especially on School Road, which poses a health and safety risk when children are leaving school. The bus services are non-existent, and it is not possible to get to the nearest city for employment. Highway safety in adequate parking and access.

The heavy parking on Ludham main street, difficulties with visibility getting out of the garage and the shop. The safety issues as the school is only a few yards away and the safety concerns of children crossing the road. There are many incidences of speeding and people not following the 30 mph speed limit. Electricity supply from Horning and Gt Yarmouth 80 and 100 years old. Horning is at full capacity and Yarmouth is almost at capacity.

With a severe lack of native deciduous trees, the oak and chestnut trees in the vicinity must be protected. This can impact the local ecosystem.

The access to the new development is highly inadequate and is not clear where the access point to the new development will be. Willow Way is a cul de sac and already has high traffic for current properties and another 60 properties will make this worse. School Road once again is a single carriageway and school children have to walk on the pavement. We notice within the consultation it mentioned about a convenient pedestrian link, where is this? The recreational ground at the village hall is at the busy A1062. All proposed accesses are inadequate and dangerous, especially going on to Norwich Road, as it's only a few metres from the junction of Pikes Nursery.

Ludham's small village, already struggling with inadequate infrastructure and amenities, cannot support the addition of 60 houses. Previous growth has not led to new services or businesses, and the area remains unsuitable for commercial development due to agricultural and conservation limitations.

Officer Response	<p>Comments noted.</p> <p>Through ongoing consultation with Anglian Water, the site-specific policy includes a requirement to provide a Foul Drainage Strategy, including how additional foul flows will be accommodated within the foul sewerage network and demonstrate that there is adequate capacity at the Water Recycling Centre. This is in addition to off-site mains reinforcement, and the provision of a project level HRA which addresses issues relating to sewerage infrastructure and hydrological issues to demonstrate adequate safeguards are in place to rule out adverse effects on the integrity of the protected sites. The site will also be required to produce a Flood Risk Assessment completion of any necessary flood mitigation measures.</p> <p>Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (Examination Library document C4, Page 25). The DWMP makes reference to Ludham and identifies multiple solutions for the Ludham-Walton Hall WRC. Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.</p> <p>Ludham is identified as a Large Growth Village in the Settlement Hierarchy and is a sustainable location for growth as set out in Policy SS1. Opportunities to provide for local infrastructure beyond what is included within the site-specific policy will be explored through the application process. Access onto Norwich is achievable and the suitability of access to Willow Way is established through the already granted permission for 12 dwellings. Vehicular access to the extension will be from Norwich Road only, with pedestrian only links to the permitted development site. The pedestrian link will be to School Road to provide access to the nearby bus stop, in addition to pedestrian access onto Willow Way through the permitted site.</p>
Section	Proposed Change 10 - Extended Site Allocation: Land South of School Road, Ludham (LUD01/C)
ID	FC357
Response Date	19/12/2024 10:32:31
Consultee Full Name	Mr Christopher Yardley
Consultee Organisation	
Agent Full Name	
Agent Organisation	

Does the Proposed Change contribute to the overall soundness of the Plan?	The current assessment and policy for this site does not adequately address landscape impacts in relation to the wider damaging effects of the proposed development. The current proposals do not make sufficient provision for landscaping to the northern, and western sides of the site to screen and integrate development into the landscape. A buffer of woodland of at least 30m is the least that can be considered appropriate -and would have been a standard provision in the 1990s / early 2000s, but more recent developments have discarded this and the results are ugly, uncharacteristic of older settlement types and damaging to the wider environment. This will protect the landscape beyond the site which is part of an attractive rural location which is particularly sensitive due to its proximity to the Broads National Park - this has not been sufficiently recognised or highlighted in this policy. This is a sensitive, intimate and attractive rural landscape which needs to be protected. So many development on the edge of settlements seem to simply abbut up to the boundary with possibly a hedge between them and the open rural landscape beyond. This is out of character with the majority of older, organic development and until about 10 years ago, the better designed and landscaped new developments. Similarly large dwellings on the boundary are inappropriate. Too often large 'land mark' dwellings of three stories are placed on prominent possitions around such developments - these are totally alien to any previous development styles and should be formally prevented
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	<p>Object: The current assessment and policy for this site does not adequately address landscape impacts in relation to the wider damaging effects of the proposed development. The current proposals do not make sufficient provision for landscaping to the northern, and western sides of the site to screen and integrate development into the landscape. A buffer of woodland of at least 30m is the least that can be considered appropriate -and would have been a standard provision in the 1990s / early 2000s, but more recent developments have discarded this and the results are ugly, uncharacteristic of older settlement types and damaging to the wider environment.</p> <p>This will protect the landscape beyond the site which is part of an attractive rural location which is particularly sensitive due to its proximity to the Broads National Park - this has not been sufficiently recognised or highlighted in this policy. This is a sensitive, intimate and attractive rural landscape which needs to be protected. So many development on the edge of settlements seem to simply abbut up to the boundary with possibly a hedge between them and the open rural landscape beyond.</p>
Officer Response	Comments noted. The site is well-situated within the context of the settlement's boundary and built form. The site-specific policy includes the provision of necessary high-quality landscaping along the western and northern boundary that will mitigate the impacts the site may have on the wider setting. The provision of a 30m buffer will significantly affect the site's ability to provide a sustainable design that delivers on the requirements set out in the site-specific policy.
Section	Proposed Change 10 - Extended Site Allocation: Land South of School Road, Ludham (LUD01/C)
ID	FC472
Response Date	19/12/2024 10:42:00
Consultee Full Name	Michael & Chantal Holme
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	We consider that the land where NNDC may have designs on building a housing estate, bordered by School Lane and Pound Lane, should be regarded as non feasible for development unless the existing problems with water and sewage drainage in Willow Way

	<p>are first dealt with comprehensively so that the ongoing situation is fully and permanently resolved .</p> <p>It seems unbelievable that this problem should be still ongoing some years after the development was completed and we were genuinely shocked to learn at the meeting that parts of Willow Way are subject to such distressing events on a recurrent and regular basis.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	<p>Object: We consider that the land where NNDC may have designs on building a housing estate, bordered by School Lane and Pound Lane, should be regarded as non feasible for development unless the existing problems with water and sewage drainage in Willow Way are first dealt with comprehensively so that the ongoing situation is fully and permanently resolved.</p> <p>It seems unbelievable that this problem should be still ongoing some years after the development was completed and we were genuinely shocked to learn at the meeting that parts of Willow Way are subject to such distressing events on a recurrent and regular basis.</p>
Officer Response	<p>Comments noted. Through ongoing consultation with Anglian Water, the site-specific policy includes a requirement to provide a Foul Drainage Strategy, including how additional foul flows will be accommodated within the foul sewerage network and demonstrate that there is adequate capacity at the Water Recycling Centre. This is in addition to off-site mains reinforcement, and the provision of a project level HRA which addresses issues relating to sewerage infrastructure and hydrological issues to demonstrate adequate safeguards are in place to rule out adverse effects on the integrity of the protected sites. The site will also be required to produce a Flood Risk Assessment completion of any necessary flood mitigation measures.</p> <p>Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (Examination Library document C4, Page 25). The DWMP makes reference to Ludham and identifies multiple solutions for the Ludham-Walton Hall WRC. Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.</p>
Section	Proposed Change 10 - Extended Site Allocation: Land South of School Road, Ludham (LUD01/C)
ID	FC512
Response Date	18/12/2024 11:05:00
Consultee Full Name	
Consultee Organisation	D L Ritchie Will Trust
Agent Full Name	David Jones
Agent Organisation	Armstrong Rigg Planning
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILES
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please	

<p>outline why you consider this to be necessary:</p>	
<p>Include files</p>	<p>L0005 - North Norfolk Local Plan Further Consultation Reqs.pdf Enclosures 1-5.pdf</p>
<p>Officer Summary</p>	<p>In addition to promoting the allocation of their land through the Local Plan, our client submitted a pre[1]application advice request in July 2022 with the aim of exploring different options for development on the site and seeking advice from statutory consultees on important design considerations regarding highways, drainage, landscape and heritage. The response to the pre-application request was positive and identified aspects of the proposed development to be improved that informed revised proposals and the key parameters for the proposed development that are taken forward into the draft allocation.</p> <p>On behalf of the D L Ritchie Will Trust, we are pleased to support Draft Policy LUD01/C Land South of School Road. Our client owns the proposed extension to the existing site allocation and previously owned the existing allocation at LUD01/A. This land has since been sold to a builder and has planning permission for 12 dwellings under reference PF/19/0991 (and amended by reference RV/23/1631).</p> <p>Enclosures 1 - An indicative masterplan of the site Enclosure 2 - Highways Technical Note which provides some context, history and design parameters to the provision of an access off Norwich Road, Ludham, for vehicular access for up to 48 dwellings and connectivity for the development. This includes detailed technical drawings to demonstrate how access can be achieved. Enclosure 3 - Heritage Statement Enclosure 4 - Anglian Water pre-application advice Enclosure 5 - Nutrient Neutrality Technical Note</p> <p>comments are provided on the draft policy wording and that demonstrate the suitability of the site for the proposed allocation.</p> <p>The Concept Masterplan shows both the existing 1.25ha site allocation (LUD01/A) with the approved layout for 12 large bungalows and the proposed 2.15ha extended area with an indicative layout. The indicative layout shows c.48 dwellings (in a mix of 1-4 bedroom dwellings) on a 1.45ha developable area (giving a density of 33 dwelling per hectare) and 0.7 ha of public open space. The total quantum of development shown is 60 and the approximate 60 dwelling allocation is therefore considered appropriate. In terms of delivery timescales, the new owner of LUD01/A is currently discharging conditions and we would expect commencement in the new year with all dwellings completed in 2025/26. LUD01/C is available for development immediately and following allocation it is expected to be delivered in 2026/27 to 2027/28.</p> <p>Highways Technical Note prepared by Richard Jackson Consulting Engineers at enclosure 2. This demonstrates that safe and suitable vehicular access can be provided to the proposed development. The existing consent for 12 dwellings would be served from Willow Way and the additional 48 dwellings served from Norwich Road. The Highways Technical Note has been provided in response to initial comments from the Norfolk County Council (NCC) Highways and we understand that it has been shared with them to review ahead of providing comments as part of this consultation.</p> <p>Please see pre-application advice from Anglian Water (AW) at enclosure 4 that was sent to the LPA case officer in response to the pre-application advice request. This response identifies that there is currently a shortfall in sewage treatment capacity, but that AW would take the necessary steps to ensure that there is sufficient treatment capacity to serve the development. The AW response recommends that a pre planning assessment is undertaken prior to the submission of a planning application. This is a formal process in response to which AW provides an assessment of network capacity and any necessary upgrades. The outcome of this assessment would inform the foul drainage strategy for the proposal. We are also aware from concerns raised at the Parish Council meeting that there are issues with the capacity of sewers in Willow Way to the east of the site. These issues would need to be assessed further in the proposed foul drainage strategy, but at this stage we can confirm that the proposal would drain to the sewer in Norwich Road and not Willow Way (see AW sewer network plans as part of enclosure 5).</p> <p>Please see Nutrient Neutrality Technical Note at enclosure 5 which confirms that the site lies outside the affected catchment areas for nutrient neutrality for both surface and foul water. As such, we consider that the likelihood of significant effects from sewerage infrastructure or hydrological issues would be screened out of any HRA. We can confirm that initial investigations have been undertaken by Richard Jackson Consulting Engineers that demonstrate that the site can be drained using a sustainable drainage system (SuDS) which will provide infiltration SuDS features including infiltration basin/s within the open space and that the proposals would be suitable in terms of flood risk considerations.</p> <p>Propose the following modifications to the policy:</p>

	<p>Proposed new criteria: In response to concerns raised at the Parish Council meeting, we consider that it would be appropriate to include a criteria healthcare and education contributions: Appropriate contributions towards increasing the capacity of healthcare and education infrastructure where required.</p> <p>Proposed new criteria: In response to concerns raised at the Parish Council meeting, we consider that it would be appropriate to include a criteria on dark skies The lighting design should pay careful attention to the preservation of dark skies.</p> <p>Proposed new criteria: The public right of way that crosses the site is blocked at its southern end where it goes through houses fronting Norwich Road. The allocation provides an opportunity to re-establish the PRow along a new route from the site entrance to Pound Lane: Development should seek to re-establish and re-route the currently inaccessible public right of way that crosses the site.</p>
Officer Response	<p>Comments and support for allocation noted. Agree in part to consider modification and amend as necessary. See modification schedule. Through ongoing engagement between the Council, Highway Authority and the site promoters, sufficient evidence, including detailed information on access arrangements has been provided that offers suitable justification that the access from Norwich Road into the site can be achieved. The suitability of access to Willow Way is already established through the land granted planning permission for 12 dwellings (which incorporates the original allocation as shown in the Submission version of the Local Plan). Vehicular access to the extension will be from Norwich Road only, with pedestrian links to the permitted development site and onto School Road and Willow Way.</p> <p>Anglian Water's Drainage and Wastewater Management Plan (available to view on their website) was published in May 2023 and is referenced within the Local Plan's Infrastructure Delivery Plan (Examination Library document C4, Page 25). The DWMP makes reference to Ludham and identifies multiple solutions for the Ludham-Walton Hall WRC. Investments considerations are always under review by Anglian Water in accordance with Local Plan development proposals and stages of production. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.</p> <p>The proposed modifications are acknowledged and will be considered further in the Local Plan Examination process. Policy CC13 includes the following wording in relation to Dark Skies: <i>Proposals for development should minimise the impact on tranquillity and dark skies.</i> All proposed allocations in the Local Plan are expected to comply with the site-specific policy and all relevant policies in the Local Plan. As shown on mapping, the ROW links Pound Land to Norwich Road, however, there is no formal connection to the ROW on Pound Lane except for a gap in the hedgerow in the North-Western corner of the field which is not the correct access point, and there is no connection to it on Norwich Road, the ROW also appears to intersect through residential properties. The proposed allocation does provide an alternative through a new route from Norwich Road to the North-Western corner of the field at the Pound Lane/School Road Junction, in addition to alternative and accessible pedestrian links throughout the site, providing a connection from Norwich Road to Willow Way and School Road. However, a modification could be included in the site-specific policy to enhance the ROW to reenable its use.</p>
Section	Proposed Change 10 - Extended Site Allocation: Land South of School Road, Ludham (LUD01/C)
ID	FC529
Response Date	19/12/2024 11:06:00
Consultee Full Name	Tessa Saunders
Consultee Organisation	Spatial & Strategic Planning Manager Anglian Water
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILES</p> <p>The site is adjacent to the Ludham-Walton Hall WRC catchment which does not have capacity to accommodate proposed future growth based on dry weather flow headroom (Q80) data[1]. There is no proposed growth investment scheme at the WRC in our PR24 Business Plan for</p>

	<p>AMP8 (2025-2030) which is subject to final determination by our economic regulator, Ofwat, on 19 December 2024. Growth in this location may need to be phased to align with the delivery of a growth scheme in later AMPs. We therefore support the need for a foul water strategy in clause 6 of the policy, but suggest that it is reworded for clarity to state:</p> <p><i>Submission, approval and implementation of a Foul Drainage Strategy demonstrating that there is capacity available in the sewerage network and at the receiving water recycling centre to accommodate wastewater flows from the site how additional foul flows will be accommodated within the foul sewerage network;</i></p> <p>The supporting text should explain that developers must undertake pre-planning engagement with Anglian Water at the earliest opportunity to assess infrastructure capacity, and any specific requirements that may be needed to deliver the proposed development, which may include sustainable points of connection to our water supply and wastewater networks to minimise impacts on existing communities and the environment. There is limited capacity in the network, therefore the need for a foul drainage strategy is supported. In terms of surface water, the downstream network is vulnerable to flood risk, which may result in joint agency impact assessments being required.</p> <p>In addition, there is a foul sewer crossing the southern area of the site and the southern access. Appropriate policy measures should be applied to ensure that developers undertake early engagement with Anglian Water to safeguard our assets and take account of associated easements so these assets can continue to be repaired and maintained as necessary.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	<p>Anglian Water Response - Front Page 19.12.24.pdf Appendix 1 WRC Capacity and Dry Weather Flow.pdf</p>
Officer Summary	<p>The site is adjacent to the Ludham-Walton Hall WRC catchment which does not have capacity to accommodate proposed future growth based on dry weather flow headroom (Q80) data[1]. There is no proposed growth investment scheme at the WRC in our PR24 Business Plan for AMP8 (2025-2030) which is subject to final determination by our economic regulator, Ofwat, on 19 December 2024. Growth in this location may need to be phased to align with the delivery of a growth scheme in later AMPs. We therefore support the need for a foul water strategy in clause 6 of the policy, but suggest that it is reworded for clarity to state:</p> <p><i>Submission, approval and implementation of a Foul Drainage Strategy demonstrating that there is capacity available in the sewerage network and at the receiving water recycling centre to accommodate wastewater flows from the site how additional foul flows will be accommodated within the foul sewerage network;</i></p> <p>The supporting text should explain that developers must undertake pre-planning engagement with Anglian Water at the earliest opportunity to assess infrastructure capacity, and any specific requirements that may be needed to deliver the proposed development, which may include sustainable points of connection to our water supply and wastewater networks to minimise impacts on existing communities and the environment. There is limited capacity in the network, therefore the need for a foul drainage strategy is supported. In terms of surface water, the downstream network is vulnerable to flood risk, which may result in joint agency impact assessments being required.</p> <p>In addition, there is a foul sewer crossing the southern area of the site and the southern access. Appropriate policy measures should be applied to ensure that developers undertake early engagement with Anglian Water to safeguard our assets and take account of associated easements so these assets can continue to be repaired and maintained as necessary.</p>
Officer Response	<p>Comments noted. Agree to consider modification and amend as necessary. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.</p>
Section	Proposed Change 10 - Extended Site Allocation: Land South of School Road, Ludham (LUD01/C)
ID	FC549
Response Date	18/12/2024 15:03:00
Consultee Full Name	Sarah

	Luff
Consultee Organisation	Norfolk County Council (Lead Local Flood Authority)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>The LLFA note that the sites that have been put forward as part of this review (referred to as Group A sites) are those sites which have been previously assessed through the Local Plan's Site Assessment Process and considered suitable for development but were not identified for allocation for reasons such as there being more sites than needed at the time for that specific settlement or, a different site in the same location provided better opportunities for community benefit.</p> <p>Please note that of the potential sites put forward as part of this consultation, a GIS shapefile has not been provided to the LLFA for one site (F05, Land between Holt and Greenway Lane, Fakenham) and as such this site has not been reviewed as part of this consultation. It is however noted that NNDC have since deemed this site unsuitable for inclusion.</p> <p>A comprehensive review of the remaining sites has been produced is attached, document title Appendix 2 FW2024_0840 – LLFA Response – Sites Review (Excel).</p> <p>Please note the LLFA's response is specific to surface water flood risk. No other sources of flood risk (including but not limited to fluvial and coastal flooding; flooding from artificial sources; groundwater flooding and sewer flooding) have been reviewed as part of this consultation.</p> <p>The following criteria have been used in our review, see appendix 2:</p> <p>Surface Water Flood Risk</p> <ul style="list-style-type: none"> • These have been reviewed for the 3.33%, 1.0% and 0.1% Annual Exceedance Probability (AEP) events for surface water flooding. • Where deemed necessary, site-specific comments have been provided. • Assessment of onsite flood risk is proportionate to the site size and the flood risk significance. <p>Reports of Internal and Anecdotal (inclusive of external) Flooding</p> <ul style="list-style-type: none"> • Reviewed with the LLFAs current flood records (which date back to 2011). • Onsite and flood records within 500m of the site boundary have been reported. • Please note all external flood records are deemed to be anecdotal. <p>Watercourses</p> <ul style="list-style-type: none"> • These have been reviewed and identified when onsite or within 100m proximity to the site boundary. • If a watercourse does not fall within the provided site boundaries (even if it is on the edge of the site boundary) this has been classed as offsite. • Watercourses have been defined (ordinary watercourse, main river etc) • We have not defined the ownership of the watercourses in this assessment. • We have not reviewed offline watercourses, blind ditches or pond features as part of this review. Further investigation will be needed to assess these features, their type and whether they are connected to the wider drainage network. • We have not defined whether the features are obstructed by housing or roads etc. <p>Surface and Foul Water Sewer Systems</p> <ul style="list-style-type: none"> • Reviewed against Anglian Water Services sewer mapping. • Both onsite and offsite surface water sewers with 100m of the site boundary have been reported. • We have not defined whether the features are obstructed by housing or roads etc. <p>Additional Information</p> <ul style="list-style-type: none"> • Source Protection Zones (SPZs) (If applicable) • Internal Drainage Boards (IDBs) (If applicable) <p>We have then reported:</p> <ol style="list-style-type: none"> 1. Would local flood risk/surface water drainage constraints be severe enough to prevent development of the site? 2. Recommendations ranging from standard information required at planning through to requiring review and potential removal if deemed appropriate. <p>Where appropriate, we have provided additional site-specific comments. For ease of use, we have produced a traffic light system based on the recommendations column:</p> <ul style="list-style-type: none"> • Red - Recommend a review of the site and potential removal from the local plan. • Orange - Significant information required at the planning stage. • Green - Standard information required at the planning stage.
Do you consider it necessary to participate in a public hearing	

<p>session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>Include files</p>	<p>Appendix 2 FW2024_0840 – LLFA Response – Sites Review (Excel).xlsx</p>
<p>Officer Summary</p>	<p>A comprehensive review of the remaining sites has been produced is attached to this representation, document title Appendix 2 FW2024_0840. LLFA’s response is specific to surface water flood risk. No other sources of flood risk (including but not limited to fluvial and coastal flooding; flooding from artificial sources; groundwater flooding and sewer flooding) have been reviewed as part of this consultation.</p> <p>The following criteria have been used in our review, see appendix 2:</p> <p>Surface Water Flood Risk</p> <ul style="list-style-type: none"> • These have been reviewed for the 3.33%, 1.0% and 0.1% Annual Exceedance Probability (AEP) events for surface water flooding. • Where deemed necessary, site-specific comments have been provided. • Assessment of onsite flood risk is proportionate to the site size and the flood risk significance. <p>Reports of Internal and Anecdotal (inclusive of external) Flooding</p> <ul style="list-style-type: none"> • Reviewed with the LLFAs current flood records (which date back to 2011). • Onsite and flood records within 500m of the site boundary have been reported. • Please note all external flood records are deemed to be anecdotal. <p>Watercourses</p> <ul style="list-style-type: none"> • These have been reviewed and identified when onsite or within 100m proximity to the site boundary. • If a watercourse does not fall within the provided site boundaries (even if it is on the edge of the site boundary) this has been classed as offsite. • Watercourses have been defined (ordinary watercourse, main river etc) • We have not defined the ownership of the watercourses in this assessment. • We have not reviewed offline watercourses, blind ditches or pond features as part of this review. Further investigation will be needed to assess these features, their type and whether they are connected to the wider drainage network. • We have not defined whether the features are obstructed by housing or roads etc. <p>Surface and Foul Water Sewer Systems</p> <ul style="list-style-type: none"> • Reviewed against Anglian Water Services sewer mapping. • Both onsite and offsite surface water sewers with 100m of the site boundary have been reported. • We have not defined whether the features are obstructed by housing or roads etc. <p>Additional Information</p> <ul style="list-style-type: none"> • Source Protection Zones (SPZs) (If applicable) • Internal Drainage Boards (IDBs) (If applicable) <p>We have then reported:</p> <ol style="list-style-type: none"> 1. Would local flood risk/surface water drainage constraints be severe enough to prevent development of the site? 2. Recommendations ranging from standard information required at planning through to requiring review and potential removal if deemed appropriate. <p>Where appropriate, we have provided additional site-specific comments. For ease of use, we have produced a traffic light system based on the recommendations column:</p> <ul style="list-style-type: none"> • Red - Recommend a review of the site and potential removal from the local plan. • Orange - Significant information required at the planning stage. • Green - Standard information required at the planning stage. <p>Summary of findings within attached document, Appendix 2:</p> <p>The site was rated as Green in the RAG rating system and the standard information on surface water flooding will be required at the planning application stage.</p>
<p>Officer Response</p>	<p>Comments noted. The site-specific policy includes the requirement for a Foul Drainage Strategy that will provide details of any enhancements and set out how additional foul flows will be accommodated within the foul sewerage network, in addition to the provision of off-site water mains reinforcement, the provision of a Flood Risk Assessment and the undertaking of a project level HRA. The LLFA will also be consulted on as part of any future application on site.</p>
<p>Section</p>	<p>Proposed Change 10 - Extended Site Allocation: Land South of School Road, Ludham (LUD01/C)</p>

ID	FC559
Response Date	18/12/2024 15:03:00
Consultee Full Name	Richard Doleman
Consultee Organisation	Principle Infrastructure Development Planner Norfolk County Council (Highways)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	The HA objects to the extension of the allocation as suitable access cannot be achieved safely for development of this scale, and without scope for further highway improvement.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	Object: The HA objects to the extension of the allocation as suitable access cannot be achieved safely for development of this scale, and without scope for further highway improvement.
Officer Response	Comments noted. Through ongoing engagement between the Council, Highway Authority and the site promoters, sufficient evidence including detailed information on access arrangements has been provided. This information offered by the site promoters provides technical evidence that the access from Norwich Road into the site can be achieved. The suitability of access to Willow Way is already established through the land granted planning permission for 12 dwellings (which incorporates the original allocation as shown in the Submission version of the Local Plan). Vehicular access to the extension will be from Norwich Road only, with pedestrian links to the permitted development site and onto School Road and Willow Way. The Council will continue to engage with both parties to ensure the site's delivery.
Section	Proposed Change 10 - Extended Site Allocation: Land South of School Road, Ludham (LUD01/C)
ID	FC575
Response Date	18/12/2024 15:03:00
Consultee Full Name	Paul Harker
Consultee Organisation	Place Planning Manager Norfolk County Council (Childrens Services)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	RAG Status = Green Impact on School Estate/Transport Proximity/Capacity to develop schools: Both primary and secondary schools are likely to be able to meet additional demand from this development.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	

Include files	
Officer Summary	RAG Status = Green Impact on School Estate/Transport Proximity/Capacity to develop schools: Both primary and secondary schools are likely to be able to meet additional demand from this development.
Officer Response	Comments noted. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.
Section	Proposed Change 10 - Extended Site Allocation: Land South of School Road, Ludham (LUD01/C)
ID	FC592
Response Date	19/12/2024 12:03:00
Consultee Full Name	Gemma Clark
Consultee Organisation	Higher Officer, Sustainable Development, Norfolk Coast and Marine Team Natural England
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILES Impacts to National landscapes Close to Broads National Park Further advice on landscapes is in Annex 3 . A Landscape Strategy or Landscape Visual Impact Assessment (LVIA) will be required to help integrate development into the landscape and minimise visual impact. Nutrient neutrality The site is adjacent to the Ant Broads and Marshes Nutrient Neutrality catchment. Consideration will be needed as to where the surface and foul water will discharge to. As such any planning application will need to be accompanied with a HRA informed by a Nutrient Neutrality budget calculation and mitigation strategy. BMV Agricultural land Loss of agricultural land. Not specified what grade. Further advice on soils is in Annex 2 . Recreational disturbance and other issues Contributions to GIRAMS included in the policy. The Additional Sites Review Background Paper, page 25 states that development was not considered further here due to negative effect on the quality of the landscape by reducing the rural character and extending into the open countryside. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to this type of development and its capacity to accommodate the proposed development. Natural England support the provision of open space, however the development site is close to the Broads SAC, Broadland SPA and Ramsar. Therefore, there could be increased recreational disturbance.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	Natural England - Annex 2.pdf Natural England - Annex 3.pdf
Officer Summary	Close to Broads National Park Further advice on landscapes is in Annex 3 . A Landscape Strategy or Landscape Visual Impact Assessment (LVIA) will be required to help integrate development into the landscape and minimise visual impact. The site is adjacent to the Ant Broads and Marshes Nutrient Neutrality catchment. Consideration will be needed as to where the surface and foul water will discharge to. As such any planning application will need to be accompanied with a HRA informed by a Nutrient Neutrality budget calculation and mitigation strategy.

	<p>Loss of agricultural land. Not specified what grade. Further advice on soils is in Annex 2.</p> <p>Contributions to GIRAMS included in the policy. The Additional Sites Review Background Paper, page 25 states that development was not considered further here due to negative effect on the quality of the landscape by reducing the rural character and extending into the open countryside. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to this type of development and its capacity to accommodate the proposed development.</p> <p>Natural England support the provision of open space, however the development site is close to the Broads SAC, Broadland SPA and Ramsar. Therefore, there could be increased recreational disturbance.</p>
Officer Response	<p>Comments noted. An LVIA will be undertaken through the application process as demonstrated in Policy ENV2 of the Local Plan. The site-specific policy includes a requirement to provide a HRA to address issues relating to sewerage infrastructure and hydrological issues to demonstrate adequate safeguards are in place to rule out adverse effects on the integrity of protected sites.</p> <p>The site is within Grade 2 agricultural land, which is included within the Best and Most Versatile Land (BMV) classification. The NPPF does not specifically restrict development BMV land but para. 187 does include the requirement to recognise the intrinsic character and beauty of the countryside and its economic benefits, in addition to protecting soils in a manner that is commensurate with their statutory status or identified quality in the relevant development plan, which is addressed through Policy ENV2 in the Local Plan. Ludham is identified as a Large Growth Village in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Restricting development in this area due to the presence of BMV land would prevent the level of growth needed as identified in the Local Plan and potentially move development to areas not within the BMV land classification that are otherwise unsustainable and unsuitable locations for growth.</p> <p>The site-specific policy includes requirements to provide open space on-site in addition to providing footway connections to the existing settlement to encourage movement towards the village and within the site over movement towards designated sites.</p>

Proposed Change 11 - Extended Site Allocation: Land off Cromer Road & Church Lane, Mundesley (MUN03/A)

Section	Proposed Change 11 - Extended Site Allocation: Land off Cromer Road & Church Lane, Mundesley (MUN03/A)
ID	FC122
Response Date	02/12/2024 09:14:00
Consultee Full Name	Mrs Bev Reynolds
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I would like to comment and raise concerns on the revised version of the new Local Plan specifically in the case of Mundesley, MUN03/A.</p> <p>The original site plan MUN03/B was for one parcel of land which I previously responded to after the meeting that was held in September with Robert Eburne from Denbury Homes.</p> <p>I would also like to comment on the revised possibility that the one site is now to become two to include what is locally known as the "Alpaca Field" which was originally designated for open green space, until the plans were altered to take into account the scale, massing and closeness to the Conservation area of MUN03/B and the number of houses to be built was reduced from 50 to 30 as follows from the new Local Plan:</p> <p>"Mundesley MUN03/B - as explained in the Council's response to Question 5.13.2, a reduction in the extent of the site's boundary was required due to the Council reducing the scale of the site from 50 dwellings to 30 dwellings, in order to mitigate impacts on a nearby heritage asset."</p> <p>Having read the new Local Plan, several things jump out which I have highlighted in red which contradicts what is stated in the Local Plan and what is potentially going to happen.</p> <p>Can you please explain why this site MUN03/B was originally chosen as the following excerpt from the new Local Plan clearly states other sites were discounted due to the following reasons, so why was MUN03/B selected when it is obviously the most elevated and dominant site in the original list? The following is taken from the new Local Plan:</p> <p>"Discounted sites were not chosen for a number of reasons, including the impact development could have on the landscape given that parts of the settlement are elevated and exposed in the wider landscape. Sites with adverse impacts on highways, poor access and would adversely affect the cumulative network were not considered."</p> <p>However it now seems that you are now dealing with two sites which together are to have 45 dwellings erected, the developer chosen for MUN03/B has already stated they are going to build 37 properties on MUN03/B as opposed to the original 30 stated in the new Local Plan.</p> <p>The new combined site is now known as MUN03/A, and they will have different access points one on Cromer Rd very close to a blind bend and the Conservation area, the second site is to potentially have access from Church Lane. This site is in a dip and borders the Conservation Area of the Railway Cottages which are specified as an area of special concern.</p> <p>The MUN03/B site has a boundary portion running along the Cromer Rd within the Coastal Change Management Area which has now become a material planning consideration for permanent dwellings. Ref CASPD as follows:</p> <p>"Permanent residential development</p> <p>4.11 Each of the participating Local Planning Authorities, other than the Broads Authority, have adopted and emerging local plan coastal policies that preclude planning permission for permanent new residential development within the identified CCMA's. This also includes any proposals for replacement dwellings and changes of use of other buildings to permanent residential accommodation. For further clarity, this relates to all types of residential use, such as individual dwellings, sheltered housing, student accommodation, hostels, shared housing for disabled people, nursing homes and care homes, residential education and training centres"</p> <p>The drainage of surface water is of high concern as overload on the sewerage system, erosion of the cliffs from the underground springs which is where most of the surface water ends up, and the proposals for water butts, rain water gardens and swales will simply not cope with the extremes of weather we are now having, as most of this water will not be carried into the sewers but absorbed into the ground and out through the already saturated cliffs. The last two major cliff falls have been due to water run off from the land not the sea!</p>

	<p>The infrastructure of the village, will simply be overloaded, specifically the waiting times for Doctors appointments, the lack of employment, the high number of properties already up for sale (approx 80) the poor road network, the reduced Bus timetables and the fact that the village is almost entirely an elderly demographic means that the village does not need a development of more 3 and 4 bedroomed houses! It would be much more appropriate to have more bungalows, and affordable/social housing which is required for both ends of the age scale and for our local residents.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	<p>Object: Can you please explain why this site MUN03/B was originally chosen as the following excerpt from the new Local Plan clearly states other sites were discounted due to the following reasons, so why was MUN03/B selected when it is obviously the most elevated and dominant site in the original list?</p> <p>The new combined site is now known as MUN03/A, and they will have different access points one on Cromer Rd very close to a blind bend and the Conservation area, the second site is to potentially have access from Church Lane. This site is in a dip and borders the Conservation Area of the Railway Cottages which are specified as an area of special concern.</p> <p>The MUN03/B site has a boundary portion running along the Cromer Rd within the Coastal Change Management Area which has now become a material planning consideration for permanent dwellings.</p> <p>The drainage of surface water is of high concern as overload on the sewerage system, erosion of the cliffs from the underground springs which is where most of the surface water ends up, and the proposals for water butts, rain water gardens and swales will simply not cope with the extremes of weather we are now having, as most of this water will not be carried into the sewers but absorbed into the ground and out through the already saturated cliffs. The last two major cliff falls have been due to water run off from the land not the sea!</p> <p>The infrastructure of the village, will simply be overloaded, specifically the waiting times for Doctors appointments, the lack of employment, the high number of properties already up for sale (approx 80) the poor road network, the reduced Bus timetables and the fact that the village is almost entirely an elderly demographic means that the village does not need a development of more 3 and 4 bedroomed houses! It would be much more appropriate to have more bungalows, and affordable/social housing which is required for both ends of the age scale and for our local residents.</p>
Officer Response	<p>Comments noted. The principle of the original allocation is not the subject of this consultation. The site-specific policy identifies access to be provided onto Cromer Road however, the exact location is yet to be determined and will be identified through the application process. The presence of the CCMA will be also be considered through the application process.</p> <p>The site-specific policy includes a requirement for the provision of a surface water management plan and enhancements to the sewage network capacity ahead of occupation of dwellings to prevent detriment to the environment and comply with the Water Framework Directive. Mundesley is identified as a Large Growth Village in the Local Plan's Settlement Hierarchy and Policy SS1 and is a sustainable location for development, identifying growth in this area is in line with the Local Plan's strategy. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.</p>
Section	Proposed Change 11 - Extended Site Allocation: Land off Cromer Road & Church Lane, Mundesley (MUN03/A)
ID	FC246
Response Date	11/12/2024 17:13:00
Consultee Full Name	Mrs

	Debbie Mack
Consultee Organisation	Historic Environment Planning Adviser Historic England
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>UN SOUND</p> <p>Whilst there are no designated heritage assets on this site, the site is adjacent to the Mundesley Conservation Area and opposite the Grade II listed All Saints Church. Any development therefore has the potential to impact upon these heritage assets and their settings.</p> <p>Criterion 1 refers to the Conservation Area and listed building which is welcomed.</p> <p>A Heritage Impact Assessment (https://www.north-norfolk.gov.uk/media/8921/c10-paper-10-historic-impact-assessment-updated.pdf) had been prepared for the smaller site. The HIA has been updated to reflect the new site area in Document C10 (https://www.north-norfolk.gov.uk/media/8921/c10-paper-10-historic-impact-assessment-updated.pdf). The HIA considers the potential impacts of the development on heritage assets and makes a number of helpful policy recommendations. These recommendations also apply to the extended area.</p> <p>HE welcomes criteria 1, 2 and 3 which capture the recommendations in the HIA.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	241218 HE response letter NNLP Further Consult.pdf
Officer Summary	<p>Whilst there are no designated heritage assets on this site, the site is adjacent to the Mundesley Conservation Area and opposite the Grade II listed All Saints Church. Any development therefore has the potential to impact upon these heritage assets and their settings.</p> <p>Criterion 1 refers to the Conservation Area and listed building which is welcomed. HE welcomes criteria 1, 2 and 3 which capture the recommendations in the HIA.</p>
Officer Response	Comments noted. The site-specific policy appropriately considers the site and the extension's impact on nearby heritage assets and provides the necessary mitigation measures needed to ensure the site's effectiveness.
Section	Proposed Change 11 - Extended Site Allocation: Land off Cromer Road & Church Lane, Mundesley (MUN03/A)
ID	FC356
Response Date	19/12/2024 10:32:47
Consultee Full Name	Mr Christopher Yardley
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	The current assessment and policy for this site does not adequately address landscape impacts in relation to the wider damaging effects of the proposed development. The current proposals do not make sufficient provision for landscaping to the western side of the site to screen and integrate development into the landscape. A buffer of woodland of at least 10m is the least that can be considered appropriate. This will protect the landscape beyond the site which is part of an attractive rural element which contributes very positively to the setting and character of the Village. It will also help to integrate the new settlement into the landscape

	form on this elevated site. Similarly development needs to be sensitively set out, give space to the area near the junction, retain the sense of the former railway line which is a feature of the history of the Village, and be of low rise types to avoid it becoming a dominant and overly prominent feature - uncharacteristic of this part of Mundesley.
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	Object: The current assessment and policy for this site does not adequately address landscape impacts in relation to the wider damaging effects of the proposed development. The current proposals do not make sufficient provision for landscaping to the western side of the site to screen and integrate development into the landscape. A buffer of woodland of at least 10m is the least that can be considered appropriate. Similarly development needs to be sensitively set out, give space to the area near the junction, retain the sense of the former railway line which is a feature of the history of the Village, and be of low rise types to avoid it becoming a dominant and overly prominent feature - uncharacteristic of this part of Mundesley.
Officer Response	Comments noted. There is a significant tree buffer that forms the old railway embankment which is to be retained through the provision of open space in the site-specific policy which will create a pedestrian/cycle link through the site. This buffer creates a suitable boundary for the site. More detailed information on the design of the site will be explored through the application process.
Section	Proposed Change 11 - Extended Site Allocation: Land off Cromer Road & Church Lane, Mundesley (MUN03/A)
ID	FC530
Response Date	19/12/2024 11:06:00
Consultee Full Name	Tessa Saunders
Consultee Organisation	Spatial & Strategic Planning Manager Anglian Water
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILES The site is within the Mundesley-Knapton Rd WRC which currently has dry weather flow headroom to accommodate wastewater flows from the proposed development site. We agree with Clause 6 but suggest that it is reworded for clarity to state: <i>Submission, approval and implementation of a Foul Drainage Strategy demonstrating that there is capacity available in the sewerage network and at the receiving water recycling centre to accommodate wastewater flows from the site how additional foul flows will be accommodated within the foul sewerage network;</i> The supporting text should explain that developers must undertake pre-planning engagement with Anglian Water at the earliest opportunity to assess infrastructure capacity, and any specific requirements that may be needed to deliver the proposed development, which may include sustainable points of connection to our water supply and wastewater networks to minimise impacts on existing communities and the environment.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	Anglian Water Response - Front Page 19.12.24.pdf

	Appendix 1 WRC Capacity and Dry Weather Flow.pdf
Officer Summary	<p>The site is within the Mundesley-Knapton Rd WRC which currently has dry weather flow headroom to accommodate wastewater flows from the proposed development site. We agree with Clause 6 but suggest that it is reworded for clarity to state:</p> <p><i>Submission, approval and implementation of a Foul Drainage Strategy demonstrating that there is capacity available in the sewerage network and at the receiving water recycling centre to accommodate wastewater flows from the site how additional foul flows will be accommodated within the foul sewerage network;</i></p> <p>The supporting text should explain that developers must undertake pre-planning engagement with Anglian Water at the earliest opportunity to assess infrastructure capacity, and any specific requirements that may be needed to deliver the proposed development, which may include sustainable points of connection to our water supply and wastewater networks to minimise impacts on existing communities and the environment.</p> <p>The attached document, Appendix 1 provides an overview on how any potential impacts on a WRC are reviewed.</p>
Officer Response	<p>Comments noted. Agree to consider modification and amend as necessary. See modification schedule. The policy requirements identified are part of the solution towards the ongoing management of the WRC and the wider network. Anglian Water have been involved throughout the Local Plan process and will continue to be involved through the application process as well.</p>
Section	Proposed Change 11 - Extended Site Allocation: Land off Cromer Road & Church Lane, Mundesley (MUN03/A)
ID	FC539
Response Date	18/12/2024 15:03:00
Consultee Full Name	Caroline Jeffrey
Consultee Organisation	Principal Planner, Minerals and Waste Policy Norfolk County Council (Minerals & Waste)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>We are pleased to note that the following new or extended site allocations recognise the site is within a mineral safeguarding area, and include mineral safeguarding requirements within the following policies:</p> <ul style="list-style-type: none"> • Land West of Pine Tree Farm, Cromer (Policy C22/4) • Land East of Tunstead Road, Hoveton (Policy HV01/C) • Land at Brumstead Road, Stalham (Policy ST04/A) • Land Adjacent Ingham Road, Stalham (Policy ST19/B) • Land off Cromer Road & Church Lane, Mundesley (Policy MUN03/A) <p>The following site allocations are within a Minerals Safeguarding Area (sand and gravel), but this has not been included within the draft policy wording. Therefore, we object to these site allocation policies unless appropriate wording, regarding minerals safeguarding, is inserted into the following policies:</p> <ul style="list-style-type: none"> • Land at Stalham Road, Hoveton (Policy HV06/A) • Land at End of Mundesley Road, North Walsham (Policy NW16) • Land West of Langham Road, Blakeney (Policy BLA01/B) <p>The policy wording used in the North Norfolk Local Plan for other sites within Mineral Safeguarding Areas is currently: "The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority."</p> <p>Due to the progress on the Norfolk Minerals and Waste Local Plan, which is planned for adoption in 2025 and would then replace the current Minerals and Waste Core Strategy, we advise updating the policy wording for all allocated sites in the North Norfolk Local Plan that are within a Mineral Safeguarding Areas to be worded as follows: <i><u>"This site is underlain by a defined Mineral Safeguarding Area for sand and gravel resource; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resource does not take place."</u></i></p>

	This wording is required to be inserted into the following policies HV06/A, NW16, BLA01/B and should also be used in policies C22/4, HV01/C, ST04/A, ST19/B and MUN03/A instead of the policy wording on mineral safeguarding used in the consultation document.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	<p>We are pleased to note that the following new or extended site allocations recognise the site is within a mineral safeguarding area, and include mineral safeguarding requirements within the following policies:</p> <ul style="list-style-type: none"> Land off Cromer Road & Church Lane, Mundesley (Policy MUN03/A) <p>Due to the progress on the Norfolk Minerals and Waste Local Plan, which is planned for adoption in 2025 and would then replace the current Minerals and Waste Core Strategy, we advise updating the policy wording for all allocated sites in the North Norfolk Local Plan that are within a Mineral Safeguarding Areas to be worded as follows: <i><u>"This site is underlain by a defined Mineral Safeguarding Area for sand and gravel resource; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resource does not take place."</u></i></p> <p>This wording is required to be inserted into the following policies HV06/A, NW16, BLA01/B and should also be used in policies C22/4, HV01/C, ST04/A, ST19/B and MUN03/A instead of the policy wording on mineral safeguarding used in the consultation document.</p>
Officer Response	Comments noted. Agree to consider modification and amend as necessary. See modification schedule.
Section	Proposed Change 11 - Extended Site Allocation: Land off Cromer Road & Church Lane, Mundesley (MUN03/A)
ID	FC550
Response Date	18/12/2024 15:03:00
Consultee Full Name	Sarah Luff
Consultee Organisation	Norfolk County Council (Lead Local Flood Authority)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>The LLFA note that the sites that have been put forward as part of this review (referred to as Group A sites) are those sites which have been previously assessed through the Local Plan's Site Assessment Process and considered suitable for development but were not identified for allocation for reasons such as there being more sites than needed at the time for that specific settlement or, a different site in the same location provided better opportunities for community benefit.</p> <p>Please note that of the potential sites put forward as part of this consultation, a GIS shapefile has not been provided to the LLFA for one site (F05, Land between Holt and Greenway Lane, Fakenham) and as such this site has not been reviewed as part of this consultation. It is however noted that NNDC have since deemed this site unsuitable for inclusion.</p> <p>A comprehensive review of the remaining sites has been produced is attached, document title Appendix 2 FW2024_0840 – LLFA Response – Sites Review (Excel).</p> <p>Please note the LLFA's response is specific to surface water flood risk. No other sources of flood risk (including but not limited to fluvial and coastal flooding; flooding from artificial sources; groundwater flooding and sewer flooding) have been reviewed as part of this consultation.</p> <p>The following criteria have been used in our review, see appendix 2:</p> <p>Surface Water Flood Risk</p>

- These have been reviewed for the 3.33%, 1.0% and 0.1% Annual Exceedance Probability (AEP) events for surface water flooding.
- Where deemed necessary, site-specific comments have been provided.
- Assessment of onsite flood risk is proportionate to the site size and the flood risk significance.

Reports of Internal and Anecdotal (inclusive of external) Flooding

- Reviewed with the LLFAs current flood records (which date back to 2011).
- Onsite and flood records within 500m of the site boundary have been reported.
- Please note all external flood records are deemed to be anecdotal.

Watercourses

- These have been reviewed and identified when onsite or within 100m proximity to the site boundary.
- If a watercourse does not fall within the provided site boundaries (even if it is on the edge of the site boundary) this has been classed as offsite.
- Watercourses have been defined (ordinary watercourse, main river etc)
- We have not defined the ownership of the watercourses in this assessment.
- We have not reviewed offline watercourses, blind ditches or pond features as part of this review. Further investigation will be needed to assess these features, their type and whether they are connected to the wider drainage network.
- We have not defined whether the features are obstructed by housing or roads etc.

Surface and Foul Water Sewer Systems

- Reviewed against Anglian Water Services sewer mapping.
- Both onsite and offsite surface water sewers with 100m of the site boundary have been reported.
- We have not defined whether the features are obstructed by housing or roads etc.

Additional Information

- Source Protection Zones (SPZs) (If applicable)
- Internal Drainage Boards (IDBs) (If applicable)

We have then reported:

1. Would local flood risk/surface water drainage constraints be severe enough to prevent development of the site?
2. Recommendations ranging from standard information required at planning through to requiring review and potential removal if deemed appropriate.

Where appropriate, we have provided additional site-specific comments. For ease of use, we have produced a traffic light system based on the recommendations column:

- Red - Recommend a review of the site and potential removal from the local plan.
- Orange - Significant information required at the planning stage.
- Green - Standard information required at the planning stage.

<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>Include files</p>	<p>Appendix 2 FW2024_0840 – LLFA Response – Sites Review (Excel).xlsx</p>
<p>Officer Summary</p>	<p>A comprehensive review of the remaining sites has been produced is attached to this representation, document title Appendix 2 FW2024_0840. LLFA’s response is specific to surface water flood risk. No other sources of flood risk (including but not limited to fluvial and coastal flooding; flooding from artificial sources; groundwater flooding and sewer flooding) have been reviewed as part of this consultation.</p> <p>The following criteria have been used in our review, see appendix 2:</p> <p>Surface Water Flood Risk</p> <ul style="list-style-type: none"> • These have been reviewed for the 3.33%, 1.0% and 0.1% Annual Exceedance Probability (AEP) events for surface water flooding. • Where deemed necessary, site-specific comments have been provided. • Assessment of onsite flood risk is proportionate to the site size and the flood risk significance. <p>Reports of Internal and Anecdotal (inclusive of external) Flooding</p> <ul style="list-style-type: none"> • Reviewed with the LLFAs current flood records (which date back to 2011). • Onsite and flood records within 500m of the site boundary have been reported. • Please note all external flood records are deemed to be anecdotal. <p>Watercourses</p>

	<ul style="list-style-type: none"> • These have been reviewed and identified when onsite or within 100m proximity to the site boundary. • If a watercourse does not fall within the provided site boundaries (even if it is on the edge of the site boundary) this has been classed as offsite. • Watercourses have been defined (ordinary watercourse, main river etc) • We have not defined the ownership of the watercourses in this assessment. • We have not reviewed offline watercourses, blind ditches or pond features as part of this review. Further investigation will be needed to assess these features, their type and whether they are connected to the wider drainage network. • We have not defined whether the features are obstructed by housing or roads etc. <p>Surface and Foul Water Sewer Systems</p> <ul style="list-style-type: none"> • Reviewed against Anglian Water Services sewer mapping. • Both onsite and offsite surface water sewers with 100m of the site boundary have been reported. • We have not defined whether the features are obstructed by housing or roads etc. <p>Additional Information</p> <ul style="list-style-type: none"> • Source Protection Zones (SPZs) (If applicable) • Internal Drainage Boards (IDBs) (If applicable) <p>We have then reported:</p> <ol style="list-style-type: none"> 1. Would local flood risk/surface water drainage constraints be severe enough to prevent development of the site? 2. Recommendations ranging from standard information required at planning through to requiring review and potential removal if deemed appropriate. <p>Where appropriate, we have provided additional site-specific comments. For ease of use, we have produced a traffic light system based on the recommendations column:</p> <ul style="list-style-type: none"> • Red - Recommend a review of the site and potential removal from the local plan. • Orange - Significant information required at the planning stage. • Green - Standard information required at the planning stage. <p>Summary of findings within attached document, Appendix 2:</p> <p>The site was rated as Green in the RAG rating system and the standard information on surface water flooding will be required at the planning application stage, in addition to further consideration needed to assess potential impacts from surface water flowpaths on-site.</p>
Officer Response	Comments noted. The site-specific policy includes the requirement for a Surface Water Management Plan to ensure that there is no increase of in run off rates from the site. The policy also includes a requirement for enhancements to the sewage network capacity ahead of occupation of dwellings to prevent detriment to the environment and comply with Water Framework Directive obligations. The LLFA will also be consulted on as part of any future application on site.
Section	Proposed Change 11 - Extended Site Allocation: Land off Cromer Road & Church Lane, Mundesley (MUN03/A)
ID	FC576
Response Date	18/12/2024 15:03:00
Consultee Full Name	Paul Harker
Consultee Organisation	Place Planning Manager Norfolk County Council (Childrens Services)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	RAG Status = Green Impact on School Estate/Transport Proximity/Capacity to develop schools: Both primary and secondary schools are likely to be able to meet additional demand from this development.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please	

outline why you consider this to be necessary:	
Include files	
Officer Summary	RAG Status = Green Impact on School Estate/Transport Proximity/Capacity to develop schools: Both primary and secondary schools are likely to be able to meet additional demand from this development.
Officer Response	Comments noted. Developer contributions would be sought as part of any detailed application proposals in accordance with the site policy and compliance with other policies set out in the Local Plan such as policy HC4 - infrastructure provision, Developer contributions and viability.
Section	Proposed Change 11 - Extended Site Allocation: Land off Cromer Road & Church Lane, Mundesley (MUN03/A)
ID	FC593
Response Date	19/12/2024 12:03:00
Consultee Full Name	Gemma Clark
Consultee Organisation	Higher Officer, Sustainable Development, Norfolk Coast and Marine Team Natural England
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	Impacts to National landscapes Outside of National Landscapes. Nutrient neutrality Outside of any Nutrient Neutrality catchment. BMV Agricultural land Not specified. Recreational disturbance and other issues Contributions to GIRAMS included in the policy. Close to the Wash SPA and Southern North Sea SAC, Sidestrand and Trimingham Cliff and Mundesley Cliff SSSI's. An increase of 45 dwellings will increase recreational disturbance to these designated sites
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	Outside of National Landscapes. Outside of any Nutrient Neutrality catchment. BMV Agricultural land Not specified. Contributions to GIRAMS included in the policy. Close to the Wash SPA and Southern North Sea SAC, Sidestrand and Trimingham Cliff and Mundesley Cliff SSSI's. An increase of 45 dwellings will increase recreational disturbance to these designated sites
Officer Response	Comments noted. Site-specific policy regarding GIRAMS already exists. Confirm site is outside Nutrient Neutrality catchment and National Landscape area.

Proposed Change 12 - Amend Policy SS1 Spatial Strategy to increase the number of Small Growth Villages (SGVs)

Section	Proposed Change 12 - Amend Policy SS1 Spatial Strategy to increase the number of Small Growth Villages (SGVs)
ID	FC25
Response Date	12/11/2024 16:05:22
Consultee Full Name	Mr James Whittington-Wilson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	While the proposed changes appear, on face value, to satisfy the requirement for additional housing in the district, additional development in small villages will not only harm the character of villages but may also negatively impact the desirability of small villages and drive buyers out of North Norfolk due to a lack of small unspoiled villages.
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	Object: Concern that whilst satisfying the need to provide additional housing, the Proposed Changes to Small Growth Villages will in turn harm their character and negatively impact their desirability as small villages, creating a lack of unspoiled villages within the district and therefore pushing buyers to look outside of North Norfolk.
Officer Response	Disagree: The proposed changes are in direct response to the Planning Inspector's comments regarding the approach to Small Growth Villages in his Initial Findings letter [Examination ref.EH006(f)].The proposed changes would, in combination, add a further 10 villages to the existing list of 23 Small Growth Villages within Policy SS1 Spatial Strategy and increase the level of growth from 6% to 9%, providing a total of 33 villages with an opportunity for small scale sustainable growth, in alignment with paragraph 83 (formerly para.79) of the National Planning Policy Framework (NPPF Dec 2023). Many more villages and hamlets in the district will remain within the designated Countryside area, where only limited types of development would be accepted under Policy SS2. The approach is also supported by the Sustainability Appraisal [Examination ref: A3], which includes in its objectives consideration of wider environmental matters. There are checks and balances within Policy SS1 to ensure appropriate sustainable development is achieved. The requirements at criterion 3 for Small Growth Village development include 3(c) that, ' <i>the proposal is small scale, incremental growth compatible with the form and character of the village and its landscape setting in terms of siting, scale, design, impact on heritage assets and historic character</i> '. In addition, any proposal would need to satisfy the requirements of other policies in the Local Plan, for example, Policies ENV8 High Quality of Design. No modification proposed.
Section	Proposed Change 12 - Amend Policy SS1 Spatial Strategy to increase the number of Small Growth Villages (SGVs)
ID	FC53
Response Date	21/11/2024 15:23:00
Consultee Full Name	Mr Edward Witton
Consultee Organisation	
Agent Full Name	

Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Para 79 of the NPPF advises that housing should be located to enhance or maintain the vitality of rural communities. Opportunities should be identified for villages to grow and thrive, especially where this will support local services, and where there are groups of smaller settlements, development in one village may support services in a village nearby. The Inspector commented that the plan's policy for smaller villages, even some with key services, are unusually restrictive.</p> <p>This omission needs to be addressed to ensure that the plan is considered to be:</p> <ul style="list-style-type: none"> - Positively prepared - Effective - Justified - Consistent with national policy - Para 79 of the NPPF refers
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	Because the Council has failed to address the Inspectors comments in respect of Para 79 of the NPPF
Include files	
Officer Summary	General comment: Concerned in respect of paragraph. 79 of the NPPF (2021), which advises that housing should be located to enhance or maintain the vitality of rural communities. Opportunities should be identified for villages to grow and thrive, especially where this will support local services, and where there are groups of smaller settlements, development in one village may support services in a village nearby.
Officer Response	<p>Disagree: The proposed change is in direct response to the Planning Inspector's comments regarding the approach to Small Growth Villages in his Initial Findings letter [Examination ref.EH006(f)]. The proposed change would add a further 10 villages to the existing list of 23 Small Growth Villages (SGV), providing a total of 33 villages across the district the opportunity for small scale sustainable growth, in alignment with para. 83 of the NPPF. These remain the most sustainable and appropriate settlements to support the rural community of North Norfolk.</p> <p>SGV selection follows a set methodology as detailed in Background Paper 2 Distribution of Growth [Examination ref C2] which has been revised in line with the Planning Inspectors comments in his letter (para. 48 (iii) [Examination ref. EH006(f)], as detailed in Appendix 2 – Distribution of Growth (Small Growth Villages) Addendum [Examination document FC004].</p> <p>Note: the NPPF paragraph referred to is now contained within paragraph 83 of the December 2023 version of the NPPF.</p>
Section	Proposed Change 12 - Amend Policy SS1 Spatial Strategy to increase the number of Small Growth Villages (SGVs)
ID	FC101
Response Date	26/11/2024 08:50:00
Consultee Full Name	Mr Callum Ringer
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I note from the draft local plan for which this consultation is taking place still omits the village of Bodham from its list of designated small growth villages. This feels anomalous when villages such as Weybourne and Itteringham are included.</p> <p>Bodham is served by a very regular bus service with a direct route into Holt, Fakenham, Cromer, Sheringham, Aylsham and Norwich. It has mains sewerage and mains gas, and is earmarked for broadband upgrades by 2029. There is a school bus direct to both Sheringham Primary and Sheringham High Schools which are located around 3 miles away. It has all the key infrastructure in place to accommodate some modest additional homes.</p>

Although not earmarked for housing in the previous two local plans, it has taken around 20 additional homes during each of these periods. There is no reason why the same modest number couldn't be accommodated again. Bodham has nearly 1 – in – 5 second homes/ holiday lets/empty properties, a number that has doubled in recent years.

Bodham has a thriving village pub playing field and village hall and is served by a mobile post office and library. There are community efforts to re-establish a shop run on a not-for-profit basis. Its viability (and that of the other amenities) is enhanced by the possibility additional homes.

I would caveat this enthusiasm for additional housing by conditioning that social housing is prioritised and that this must be on a local lettings basis (exception). 50+ local families are on the housing waiting list with a direct connection to the village or a surrounding parish and it is my view that this need is met.

Whilst there are highways concerns about the A148 these are no different to High Kelling which I note *is* earmarked as a small growth village.

Weybourne and Itteringham are included because of their village shop, although it is worth noting that in both instances these are primarily café's with a small grocery offering which whilst better than nothing is perhaps not something that the inspector has considered. Itteringham in particular is an interesting addition given that the majority of the land is owned by the national trust, it has no IT provision (ITTERINGHAM is an anagram of IT NIGHTMARE) or mains services. It sits on the sensitive Bure floodplain and has 1 bus a week each way which travels by some convoluted means to nearby market towns. That is not to say that Itteringham and Weybourne should not be included, but if they can be – why not Bodham?

The local plan, in my view, rather than allocated vast numbers of homes in towns (often in very inappropriate places, (Clifton Park site Cromer/East Runton and NW16 sites being case in point and should absolutely NOT be in the final version of this plan) and should insist on modest development in parishes. The social and cultural fabric of communities relies on people living in them. Many of our villages have already lost key amenities, struggle to maintain village halls, churches and community groups as the numbers of second homes depletes the numbers of permanent residents. North Norfolk's stagnant population figure hides the significant percentage drop seen in many of the smaller villages over the last 15 years or so and this draft local plan does nothing to address that imbalance in the most part.

In Summary: Bodham should be IN

Serious consideration could be given to; Aylmerton (Pub, Petrol Station/Shop, Village Hall with nursery school); West Beckham (Pub, 10 new exception houses in the village, other amenities shared with Bodham); Gresham (Village School) for small social housing developments approx. 10 homes with LOCAL LETTINGS POLICIES.

Do you consider it necessary to participate in a public hearing session, should these be required?

If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:

Include files

Officer Summary

Support: Supports the principle of the additional Small Growth Villages and wishes to promote the village of Bodham as a SGV, given its existing infrastructure benefits and good public transport links. Comments of the particular encouragement for affordable housing to be prioritised in Bodham given the stated local housing need. Comments that a modest amount of new housing has historically come forward in Bodham and this should be allowed to continue.

Officer Response

Support acknowledged for proposed additional Small Growth Villages.

Disagree: The selection of SGVs follows a set methodology. Bodham does not meet the methodology criteria of 1 key service and 4 or 3 secondary or desirable services, as detailed in Background Paper 11 Distribution of Growth [Examination ref.C2] and the Small Growth Villages Addendum [Examination ref.FC003], which has been applied consistently in order to provide opportunities for small scale housing development in the more sustainable villages within the district. Bodham has no key services. Background Paper 11 explains the importance of the presence of at least one of the 3 key services required (primary school, convenience shop or GP surgery) in terms of sustainability. Affordable housing has been delivered in Bodham through the current rural exceptions policy and in the future, can be delivered under Policy HOU3 Affordable Homes in the Countryside (Rural Exceptions Housing), as well as

	other types of housing accepted under policy SS2 and through Neighbourhood Planning should one be undertaken.
Section	Proposed Change 12 - Amend Policy SS1 Spatial Strategy to increase the number of Small Growth Villages (SGVs)
ID	FC133
Response Date	03/12/2024 14:27:00
Consultee Full Name	Ms Sasha Walton
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>The approach to Small Growth Villages in Policy SS1</p> <p>The appointed Local Plan Inspector advised the Council that more concrete steps were needed to be taken to bring forward more housing. One of the options included the expansion of the list of small growth villages to include those “with a single key service and (say) three secondary/ desirable services”.</p> <p>The Inspectors’ letter to the Council at paragraph 48, refers to the expansion of the list of Small Growth Villages to include those with a single key service and (say) three secondary/ desirable services. He noted that there are numerous villages with a primary school, convenience shop or other services that are sufficiently nucleated in form to allow for a coherent settlement boundary which are not included.</p> <p>The Inspector confirmed the national planning policy support for seeking such amendments to the Small Growth Village through paragraph 79 of the NPPF, 2021 (paragraph 83 of the NPPF 2023), which states that:</p> <p>‘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. Where there are groups of smaller settlements, development in one village may support services in a village nearby.’</p> <p>The Inspector concluded in paragraph 49 that, as ‘submitted the plan’s policies for smaller villages, even some with key services, are unusually restrictive.’ Consequently, the objective of this Consultation Paper is to assess and identify further villages that can be considered for small scale growth, in response to the Inspector’s soundness concerns.</p> <p>The Council’s methodological approach to the identification of settlement boundaries has resulted in the estimated addition of approximately 421 new dwellings.</p> <p>In looking for more ‘concrete steps’ the Council has undertaken an assessment of a list of 10 potential Small Growth Villages which have been reviewed for boundary purposes. The list includes Neatishead and the village was given a boundary in the review, having had one in the 1998 Local Plan.</p> <p>A detailed assessment has been conducted for each of the villages through the application of Stage 2 through to Stage 5 of the methodology for selection and where an amended qualifying benchmark of one key service and three secondary or desirable services at Stage 3 is applied. An overall conclusion regarding the suitability of the settlement being identified as a Small Growth Village is reached at the end of each assessment. The review uses an outdated and estimated figure for the population of each village.</p> <p>The assessment does not represent policy and will not determine whether sites should be allocated in the Local Plan or granted planning permission. It also represents a ‘snapshot’ of capacity based upon the data and information available (e.g. site constraints, landowner intentions, and site availability) as at 1st August 2016. Site assessments are on an individual site basis, rather than any consideration of cumulative constraints. In some respects, the estimates of the actual potential supply of new housing achieved through the selection of more Small Growth Villages is crude.</p> <p>The review considered the Local Plan 1998 settlement boundary for Neatishead. In accordance with the criteria set out within the Settlement Boundary Methodology, and subject to the settlement being selected as a Small Growth Villages, it was proposed to designate a new settlement boundary as illustrated in Appendix 1, with three amendments.</p> <p>For Neatishead a table was set out of the level of services and facilities, summarising the ‘known constraints’ and identifies the ‘known housing need and land availability’. A conclusion</p>

has been provided regarding these factors, setting out the settlement's position within the hierarchy.

The Council's conclusion reached was that Neatishead would only meet the criteria for a Small Growth Village when considered in combination with an outlying hamlet. Given the dispersed nature of the facilities and services across three settlements and the lack of safe and sustainable access between them it was not selected as a Small Growth Village. As such, all of development within the village will be identified as being in the 'Countryside' for the purposes of Policy SS1.

Again, this conclusion, there are, we believe, a number of factors that suggest that this assessment and the conclusion is flawed.

Starting with the 'services' that the village has. The table correctly identifies the Primary School, Convenience Shop, Public House, Meeting Place (Village Hall) and Church. The school, the shop and the public house are wholly reliant upon future growth. The shop in particular reaches out to residents most calendar months via the local NAB magazine to ask residents to shop there to keep its survival. The school has unfilled places and therefore undersubscribed and running at only 76% capacity with 68 pupils (source: The current Locating report for Neatishead Church of England Primary School). Without some growth that percentage capacity is likely to decrease. The potential closure of these services and facilities would require residents to travel further afield.

However, the list of services is incomplete. The village has other shops (Regency Gift Shop and Kingfisher Picture Framing and The Fudge Lady) and employment in the form of The Granary Business Park in School Road (via FlexiTog UK Ltd and Dunhams Washroom Systems Ltd) and two B&B's (Regency B&B and Ye Olde Saddlery B&B) - one of which includes a pizza takeaway business. It is noted that FlexiTog UK Ltd describes itself as having 11-50 employees (source: www.linkedin.com as at 1 December 2024) and Dunhams Washroom Systems Ltd describes itself as having 11-50 employees (source: www.linkedin.com as at 1 December 2024).

The conclusion and rejection of a boundary relies upon the Council's description of the village as comprising three 'settlements'. However, all of the so-called outlying hamlets are within the village of Neatishead – the school, shop, pub, meeting place (village hall), church, business park, other shops and B&B's are all in Neatishead and serve the village. Note the meeting place (village hall) serves Neatishead as well as Barton Turf and Irstead. Residents of the so-called outlying hamlets would not consider their location to be anything other than within the village.

The areas within which the services and facilities are located are not so dispersed to the extent that they do not, nor cannot, perform the purposes and functions that they fulfil for the residents of Neatishead. There is no reason why all three could not be linked within a common boundary that embraced all of the developed areas, from the south of the 1998 boundary that the Council has used as its starting point, southwards to include the development at Street Hill and the camp site, excluding the open fields either side of School Lane and picking up the areas that include the school and the business park west and east along School Road.

Alternatively, three individual boundaries could be formed, starting with that which is already shown on the map of the Settlement Boundary Review together with its minor extension southwards and then including boundaries around the development to the south along and around School Road and School Lane, embracing the school and the Granary Business Park. Defining more than one boundary has not stopped the elevation of some of the villages that have been assessed, as detailed below.

As the Council points out in its Settlement Boundary Review, a settlement boundary is after all a line drawn on a plan around a town or village, which reflects its built form. The review refers specifically to the inclusion of schools, public houses, commercial buildings, farmhouses and buildings.

The Housing & Economic Land Availability Assessment (HELAA) Part 1 (2017) did not identify any sites at Neatishead. This is largely because of the limited boundary that Neatishead was given, excluding the services and facilities that it actually offers.

Defining a boundary does not automatically mean that every site within it would be suitable for development. However, the elevation of Neatishead to a Small Growth Village status with a defined boundary, creates the opportunity to achieve the linked objectives of increasing the rural housing supply and at the same time saving the existing services and facilities for future generations in the village. The Council acknowledges that settlement boundaries have a particular level of key services which underpins the sustainability of further development in that community. In combination, Neatishead fulfils the key services and secondary/desirable services requirements to achieve Small Growth Village status.

There are differing boundaries within those villages that have been selected. Beeston Regis for example has no key services and three secondary or desirable services. The boundary

for that village is drawn tightly around residential development with little or no potential for any growth within it.

The boundaries given to Erpingham and Felmingham involve quite significant intrusions into the open countryside and Great Ryburgh has a linear boundary with little scope for growth. It has no school, no meeting place and no public house. Neatishead has all three and more. Ironically Itteringham has been given three separate boundaries comprising small pockets of development with no school and no employment land and Tunstead has been given two separate boundaries.

To re-iterate Neatishead is not a collection of 'hamlets'. It is a village which boasts a primary school, shops, village hall, church and employment. It also caters for tourist accommodation. However, with it being given a countryside location for the purposes of Policy SS1 the prospect of it growing in a controlled way through the demarcation of a boundary around its already developed areas will be lost. The location of the facilities and services within the village has not hindered the functions of the services that they fulfil.

Villagers are well aware of the need for safe passage between the services and the facilities that the village provides and of the need for care when using them. Having to use narrow roads is not uncommon in rural areas and to a great extent this in itself leads to more care being taken by pedestrians and vehicles that pass along them, knowing the nature of those routes.

The majority of villages in Norfolk have limited pedestrian facilities (footways) for most of their lengths and narrow roads. Drivers using the roads that serve the village are aware, through the lack of footpaths, speed limit signs and school and business park awareness signage that they should drive with caution. These are speed deterrents. The Small Growth Villages that have been selected for their growth potential would have similar limited pedestrian facilities (footways) and narrow roads too.

The rejection of Neatishead in the context of its selection as a Small Growth Village will harm the continued viability of the school, the convenience store, other shops, and the public house. Even if the village is 'dispersed' as the Council has concluded, the alleged lack of safe and sustainable access between them should not have led to the rejection of its classification as a Small Growth Village.

Paragraph 83 of the NPPF (2023) 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'.

This representation therefore is an objection to the failure of the Council to allocate Neatishead as a Small Growth Village and one that is capable of delivering some limited housing, enabling it to grow and thrive to support its local services.

Do you consider it necessary to participate in a public hearing session, should these be required?

If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:

Include files

Officer Summary

Object: Descriptive summary of the Inspectors Findings letter in relation to small growth villages and NPPF para. 83 (2023), the Distribution of Growth Background Paper 2 [Examination ref. C2], the Addendum to Background Paper 2 (SGVs) [Examination ref. FC003] and the Settlement Boundary Review (SGVs) Addendum [Examination ref. FC004]. Reference is made to the Council's methodological approach to the identification of settlement boundaries resulting in the estimated addition of approximately 421 new dwellings.

The village assessment for Neatishead (within Appendix 2) is reviewed and cited as being flawed for a number of reasons, concluding that Neatishead should be designated as a SGV in order to ensure retention of the existing services and facilities. Firstly, the list of services is considered incomplete, adding that the village has other shops (3 named) and employment (two businesses named) and two B&Bs. The full complement of services and facilities are not so dispersed to the point where they do not, nor cannot, perform their functions for the residents of Neatishead.

The Council's conclusion with regards to the proposed designation of one settlement boundary rather than designating three settlement boundaries, which would be comparable to other split SGV settlement boundaries, such as Tunstead (two separate boundaries) and Itteringham (three separate boundaries). The HELAA 2017 did not identify any sites in Neatishead largely

	<p>because of the limited boundary that Neatishead was given, excluding the services and facilities that it actually offers.</p> <p>The other Small Growth Villages that have been selected would have similar limited pedestrian facilities (footways) and narrow roads as Neatishead and as such, the village should not be rejected as a Small Growth Village.</p>
Officer Response	<p>Comments noted.</p> <p>For the purposes of the assessment as a SGV a settlement needs to be 'sufficiently nucleated', as confirmed by the Inspector at paragraph 48(ii) in the Initial Findings letter [Examination ref. EH006(f)]. It is acknowledged that Neatishead is both the name of the village and also the civil parish, but for the purposes of providing a coherent settlement boundary to apply the requirements of Policy SS1 (criteria 3), the main built form of the village has been assessed. Part of this built form straddles across into the Broads Authority Area to the east. As described in the Addendum to the Distribution of Growth (SGVs), a number of the services and facilities associated with Neatishead are considered to be significantly dispersed and as such, the provision of a coherent settlement boundary or boundaries did not meet the objectives of the methodology.</p> <p>However, of the services and facilities mentioned in the consultation response, the Regency Gift Shop is located within the core village and does appear to provide 'other shopping' opportunities within Neatishead. Including the newly identified shop within the village assessment, would provide the required 1 key service (village stores) and 3 secondary/desirable facilities (gift shop, public house and village hall).</p> <p>Modification agreed – see modification schedule</p>
Section	Proposed Change 12 - Amend Policy SS1 Spatial Strategy to increase the number of Small Growth Villages (SGVs)
ID	FC308
Response Date	16/12/2024 22:33:03
Consultee Full Name	A Bird
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I support Tunstead being re-categorised from countryside to a SGV.</p> <p>As per your findings it has the requirements of 1 key service and 3 secondary services. The key service being the primary school which expanded in 2021.</p> <p>In addition to the above requirements Tunstead is also perfectly located to be a SGV as it is very close to the surrounding towns and larger villages of Hoveton, Wroxham, North Walsham, Stalham and Coltishall which all provide many additional key, secondary and desirable services including high schools, shopping, GP surgeries, post offices, petrol stations, employment and restaurants etc.</p> <p>Regarding your conclusion in document EX034(a)</p> <ol style="list-style-type: none"> 1. Tunstead has one key service and three secondary or desirable services - correct. 2. There are limited environmental and infrastructure constraints -correct. 3. There is moderate housing need demand and no known land availability- correct regarding the demand, incorrect regarding land availability as there is known land availability within the centre of the village. I can also provide NNDC with details of local residential developers who are keen to purchase and develop small sites in Tunstead.
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	Support: in support of Tunstead being identified as a Small Growth Village, as it has one key service and three secondary or desirable services, there are limited environmental and infrastructure constraints and there is moderate housing need, but there is known land

	availability in the centre of the village. Details can be provided of local residential developers who are keen to purchase and develop small sites in Tunstead.
Officer Response	Support noted.
Section	Proposed Change 12 - Amend Policy SS1 Spatial Strategy to increase the number of Small Growth Villages (SGVs)
ID	FC332
Response Date	17/12/2024 14:26:00
Consultee Full Name	Mr David Anderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>As full-time residents of Langham, my wife and I strongly oppose plans to increase the size of the village. The Council should bear in mind that villages, such as Langham are adjacent to the coast and are already under much more pressure than those further inland. In the holiday season and weekends, there is a significant increase in traffic on the narrow and busy roads through Langham. It has already become worse with vehicles trying to avoid the congestion on the coast road A149 or to link to the A148 to the south.</p> <p>We live on North Street which leads to Morston and the A149 coast road. Although there is a 20 mile per hour speed limit, drivers frequently ignore it. It is already a very busy road which is exacerbated when parents bring their children to and collect them from the School. Child safety and that of more pedestrians will not be improved by further traffic. Parking for the School on each side of the road is obstructive to safe access and exit for residents and the Harper Hotel. Service vehicles for the Harper and holiday rental properties also park on the road.</p> <p>Having spoken to the headmistress we understand the School is full so it will not prove to be the benefit suggested in the planning analysis</p> <p>If a development of, say 15 further dwellings is proposed, this will almost certainly result in an extra 30 vehicles or more on the roads through Langham, as there is little local employment necessitating car usage. Additional delivery vehicles will inevitably result in a significant increase in traffic. The Binham/Holt Road running west/east is already very busy with through traffic from villages to the west connecting with Holt. As this is a rural working environment there are tractors and large vehicles and trailers servicing Langham Farm Poultry as well as Sugar Beet, Cereal and Pig farming.</p> <p>Langham is not well served by footpaths and given the narrowness of the roads there is insufficient space to facilitate footpath improvement. There are limited footpaths from the crossroads by the Church toward the Pub or in the other direction past the Village Hall towards St. Marys. The Village Hall does not have sufficient parking so people park on both sides of the road including on the footpath to avoid obstruction. There is no Church carpark so cars park on the small footpath by the wall therefore pedestrians have to walk in the road. This leads to lack of visibility at the crossroads. The Pub has no carpark so cars park on both sides of the road in the centre of the village. Cars using the holiday homes in the village do likewise. Many local residents walk around the village and this is already hazardous for pedestrians, dog walkers and children. The situation will become even more dangerous through village expansion.</p> <p>In an era of home working and internet necessity residents complain of poor Broadband coverage and phone signal. Additionally, expansion of the village will put further pressure on Langham Sewage Treatment Works.</p> <p>Whilst the proposed changes may satisfy the requirement for new housing in the district, additional development in Langham will harm the character of the village. Having spoken to a number of other local residents the consensus of opinion is that this is a special place and should be preserved as such.</p> <p>Our further concern is that if 'infill sites' cannot be found within the new curtilage of Langham, then valuable farm land in an area of Outstanding Natural Beauty will be lost. One of the most important reasons people want to live in villages like Langham is that they are currently relatively unspoiled. This includes young and older people alike. We feel that it is the responsibility of the District Council to be guardians of this protected environment. It is important to balance quality of life with a necessity for new housing. In conclusion we think that the village is full and enlargement is inappropriate.</p>

Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	<p>Object: Strongly oppose Langham being proposed as a SGV for a number of reasons. Firstly, due to further increase in traffic on top of pressure from tourist traffic, on the narrow busy roads, with few public footpaths and which are frequented by agricultural vehicles. There is no or limited car parking for the existing facilities such as the church, village hall and pub, which causes unsafe on street parking, which would be exacerbated by further growth. In addition, internet connectivity is poor, and growth would put further pressure on the sewerage treatment works.</p> <p>The character of the village will be harmed, particularly if valuable farmland is built upon, in an AONB. It is the Council's responsibility to protect the environment. The village is full and enlargement is inappropriate.</p>
Officer Response	<p>Disagree: Langham has been assessed against the revised methodology and meets the criteria to be identified as a SGV, with an indicative housing allowance of 15 dwellings. The assessment acknowledges the moderate environmental constraints associated with the village, including that the northern part of the village sits within the Norfolk Coast National Landscape (AONB) and that the southern part is adjacent to the designation, but this, in combination would not prevent the opportunity for small scale development within the village. The comments regarding infrastructure are noted but are unevidenced. Such matters would be assessed in detail at the planning application stage alongside all other material considerations.</p>
Section	Proposed Change 12 - Amend Policy SS1 Spatial Strategy to increase the number of Small Growth Villages (SGVs)
ID	FC336
Response Date	17/12/2024 10:26:00
Consultee Full Name	Christian Cardiss
Consultee Organisation	Lanpro Services
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILE
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	241217_Raynham Reps_Covering Letter_Final Combined.pdf
Officer Summary	<p>Object: The Council's SGV approach is restricting the growth potential in the southwest of the district, limiting the ability to sustainably develop rural communities beyond Fakenham. The response supports the identification of The Raynham's (East, West, South) as Small Growth Villages as when they are coupled with Helhoughton they clearly and demonstrably meet the criteria for Small Growth Villages, providing one of the identified Key Services and four Secondary/Desirable Services.</p> <p>The Raynham's act as a gateway to the District of North Norfolk, in an area that has previously been forgotten by the Council, but now happily supported through commercial growth, employment and investment. As a result, proportionate residential growth is intended for</p>

	<p>primary housing only to support the rural economy and the workforce within The Raynham's to sustain it. Notwithstanding their collective provision, it can be clearly demonstrated that East and West Raynham provide the level of service provision sufficient to meet the criteria for consideration as a Small Growth Village in the emerging Local Plan.</p> <p>The Planning Inspectorate identify that Small Growth Villages should provide one of the identified Key Services and three Secondary/Desirable Services, and in that regard The Raynham's meet the criteria for Small Growth Villages as follows: - Key Services: School - Secondary Services: Connectivity and public transport (A1065), Village Hall, Post Office (mobile), Public House - Desirable Services: Petrol Filling Station. On this basis, we respectfully request that Policy SS1 of the Emerging Local Plan is amended to include The Raynham's and Helhoughton as a Small Growth Village.</p>
Officer Response	<p>Disagree: The proposed change would add a further 10 villages to the existing list of 23 Small Growth Villages (SGV), providing a total of 33 villages across the district the opportunity for small scale sustainable growth, in alignment with para. 83 of the NPPF. These remain the most sustainable and appropriate settlements to support the rural community of North Norfolk.</p> <p>SGV selection follows a set methodology as detailed in Background Paper 2 Distribution of Growth [Examination ref C2] which has been revised in line with the Planning Inspectors comments in his letter (para. 48 (iii) [Examination ref. EH006(f)], as detailed in Appendix 2 – Distribution of Growth (Small Growth Villages) Addendum [Examination document FC004].</p> <p>East and West Raynham were assessed as one settlement against the methodology criteria at the regulation 18 stage of the Local Plan – see Appendix 1 of the main Background Paper 2, where the assessment identified a primary school, a village hall and a church. Since this time, and as part of the review of all villages within Background Paper 2, the combined settlement was reviewed again. It has been found that West Raynham Primary Academy closed in February 2022 - West Raynham Church of England Primary Academy - GOV.UK (get-information-schools.service.gov.uk). In addition to this, and for information, the separate West Raynham School is an independent special school for 5-17 year olds with SEMH needs (https://ortuseducation.co.uk/) and not a catchment school serving the local area. In terms of a meeting place, eg. a village hall, this is not located in either East or West Raynham. As such, under the Background Paper's methodology the combined settlements of East and West Raynham have no key services and one secondary or desirable service (St. Mary's Church which itself is situated between the two settlements). The other services and facilities listed within the response are dispersed within the wider area or are not static services, ie. Helhoughton mobile Post Office, which do not meet the terms of sustainability set by the methodology, particularly as there would be concerns about accessibility to these services and facilities in relation to traffic and pedestrian safety given the nature of the country roads with no lighting or footpaths.</p>
Section	Proposed Change 12 - Amend Policy SS1 Spatial Strategy to increase the number of Small Growth Villages (SGVs)
ID	FC418
Response Date	18/12/2024 21:45:51
Consultee Full Name	Mrs Anne-Marie Coe
Consultee Organisation	Deputy Chair Langham Parish Council
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>We believe the proposed change is not properly prepared because Langham's sole primary criterion for Small Growth status - Langham Primary School - is at full capacity and the Education Authority has not made funds available for additional buildings. Therefore any new children resident in Langham, with priority for places, would displace other children in the wider catchment area.</p> <p>We do not believe the proposed change would be effective because village internet capacity is already overstretched, and because traffic volume and speed on the villages's narrow roads are already high, particularly during school drop off and pick up times, as well as throughout the summer when many tourists transit through Langham in a hurry to the nearby coast.</p>

	<p>We do not believe the proposal is dustified given the lack of school paces, the lack of any other primary Small Growth Village criteria, and Langham's limited infrastructure.</p> <p>We do not believe the proposal would be consistent with national policy if, given the high cost of building land within the existing village boundary or land adjacent to the existing boundary which was in line for planning permission, developers gained planning permission and then claimed they could not cover the cost of constructing affordable housing, and insisted on deletion of the affordable housing from their plans. Recently this has happened in Holt and elsewhere in North Norfolk and is likely in Langham.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	To ensure that any decisions taken about the future of our village are taken with the village's full involvement.
Include files	Langham Village meeting 4 December 2024.pdf
Officer Summary	<p>Object: Minutes provided of Langham Village meeting of 4th December 2024, where some positive feedback was received from residents to proposed growth, but the majority wished for Langham to remain in designated Countryside and not be identified as a SGV. Clarity requested on the indicative housing allowance number and the percentage/ level of affordable housing. A number of practical considerations are listed covering, parking, increase in traffic volume and speed, capacity of clean water and drainage systems, capacity in school (currently at full capacity), access to local health and social services and improved pavement provision. Policy support needed in order to support the desire to limit the potential increase in second home ownership and for sites to be offered to RLs first. In addition, comments relating to consistency of policy between the district and county councils, where an example is cited regarding differing positions about pavement provision.</p> <p>Other comments regarding unsuitability of Langham as a SGV relate to overstretched capacity of internet, lack of school spaces, lack of any other primary SGV criteria, and Langham's limited infrastructure. In addition, concern about the high cost of land that may cause a situation where planning permission is gained and then affordable housing is not viable, as happened recently in Holt.</p>
Officer Response	<p>Disagree: Langham has been assessed against the revised methodology and meets the criteria to be identified as a SGV (1 key service and 3 secondary/ desirable services), with an indicative housing allowance at 9% growth of 15 dwellings. The comments regarding infrastructure are noted but are unevidenced. Such matters would be assessed in detail on a site-specific basis at the planning application stage, alongside all other material considerations.</p> <p>The Council is required to plan for the wider strategic housing needs of the district and as a proposed SGV, Langham will assist with the delivery of this wider need. Matters such as second home ownership are not a strategic matter, but could be considered at Neighbourhood Plan level with the appropriate justification.</p>
Section	Proposed Change 12 - Amend Policy SS1 Spatial Strategy to increase the number of Small Growth Villages (SGVs)
ID	FC451
Response Date	19/12/2024 11:03:29
Consultee Full Name	Mr Chris Alston
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	Worstead is an unsustainable site for any expansion of development. The roads adjacent to the site are unclassified with substandard junctions and visibility splays. The village has no supporting services other than a public house and school, which is oversubscribed. Bus srVICES are minimal and walking and cycling to north walsham is unsupported and unsafe. please reconsider these changes

Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	Object: Worstead is an unsustainable settlement for expansion. The roads adjacent to the site are unclassified with substandard junctions and visibility splays. The village has no supporting services other than a public house and a school, which is oversubscribed. Bus services are minimal and walking/ cycling to North Walsham is unsafe.
Officer Response	Disagree: SGVs do not have site allocations, but instead have an indicative housing allowance where a site can come forward provided a proposal satisfies the requirements in criteria 3 of Policy SS1 Spatial Strategy. Worstead has been assessed against the revised methodology and meets the criteria to be identified as a SGV, having one key service and three secondary/ desirable services.
Section	Proposed Change 12 - Amend Policy SS1 Spatial Strategy to increase the number of Small Growth Villages (SGVs)
ID	FC457
Response Date	19/12/2024 11:46:00
Consultee Full Name	Frances Green
Consultee Organisation	
Agent Full Name	Frances Green
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Worstead is a conservation village with a historic core and developments have largely been organic over centuries. It retains a rural character together with important buildings included in Pevesner' North East Norfolk Architectural guide which combined with the history of weaving make it one of Norfolk's rare unspoilt villages and a draw for visitors to the region. Another unusual quality of Worstead is that it is a dark sky village with no street lighting or light pollution.</p> <p>Any developments should be limited to very few houses to retain the historic character of the village which is an asset to the county.</p> <p>Worstead is unsuitable for expansion as it is an isolated community with no local shop or bus service and has small roads heavily used by agricultural traffic. Any increase in traffic on the small access roads to the village would directly increase hazard. There are several blind bends on the road to Westwick especially when meetings tractors. Access to both the B1150 and A149 have poor to very poor visibility and accidents are relatively common. There is no safe cycle route to North Walsham the closest town for shopping, the only routes being the A1150 and A149. The village school is also oversubscribed.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	As as resident of Worstead I would like to continue to live in our historic village community safely and feel its imporant to be involved in any changes.
Include files	
Officer Summary	<p>General comment: Worstead is a conservation village with an historic core. It's history makes it one of Norfolk's rare unspoilt villages which draws visitors to the region. It is a dark sky village with no street lighting and no light pollution. Any developments should be limited to very few houses to retain the historic character of the village.</p> <p>Object: Worstead is unsuitable for expansion as it is an isolated community with no local shop or bus service and has small roads heavily used by agricultural traffic. Any increase in</p>

	<p>traffic on the small access roads to the village would directly increase hazard. There are several blind bends on the road to Westwick and access to both the B1150 and A149 have poor to very poor visibility with accidents being relatively common. There is no safe cycle route to North Walsham, the closest town for shopping, with the only routes being the A1150 and A149. The village school is also oversubscribed.</p>
Officer Response	<p>Disagree: Worstead has been assessed as meeting the requirements to be designated as a Small Growth Village, where small scale housing development would help to retain the existing facilities and services and support the future vitality of the village. The comments regarding infrastructure are noted but are unevidenced. Such matters would be assessed in detail at the planning application stage alongside all other material considerations.</p>
Section	Proposed Change 12 - Amend Policy SS1 Spatial Strategy to increase the number of Small Growth Villages (SGVs)
ID	FC480
Response Date	19/12/2024 10:11:00
Consultee Full Name	Cllr Nigel Dixon
Consultee Organisation	Ward Member for Hoveton & Tunstead (NNDC)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Tunstead - 42 new homes - Tunstead has serious foul water and surface water drainage capacity problems in at least 2 areas of Market St and although some alleviation measures are in hand their success is untested and 42 new homes will create further problems. This proposal must not be delivered without uprating the Belaugh WTC to prevent storm discharges to the river Bure and some improvement to the road to Hoveton. I must also add Tunstead doesn't have a village hall and is unlikely to get one during the life of the new Local Plan.</p> <p>Stalham, Worstead, Catfield & Ludham proposals - all these will significantly add to the traffic loading on the A1151 and cause more harmful traffic congestion, travel delay and poor air quality through Hoveton and Wroxham. They must not proceed without appropriate traffic mitigation measures to relieve the impact of the extra traffic generated.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	<p>General comments: Tunstead has serious foul water and surface water drainage capacity problems in at least two areas of Market Street and whilst alleviation measures are in hand they have not been tested to have been successful. The addition of 42 new dwellings will create further problems and should not be delivered without uprating the Belaugh WTC. In addition, Tunstead does not have a Village Hall and is unlikely to get one during the lifetime of the new local plan.</p> <p>The proposed additional housing at Stalham, Worstead, Catfield and Ludham will significantly add to traffic loading on the A1151 and cause harmful congestion and poor air quality through Hoveton and Wroxham. Development in these settlements must not proceed without appropriate traffic mitigation measures.</p>
Officer Response	<p>Disagree: Tunstead has been assessed as meeting the requirements to be designated as a Small Growth Village, where small scale housing development would help to retain the existing facilities and services and support the future vitality of the village. Although the identified village hall in Tunstead is a temporary building, it nevertheless functions as a community centre according to the website: Tunstead Village Hall & Recreation Ground (https://tvhandrecreation.co.uk) and which also details the approved village hub plans that were granted by the Council in 2022.</p> <p>The village assessments are based on high level Information. Flood risk information, including surface water flooding, is taken from the SFRA 2017/ 2018 [Examination ref. G5]. The report records Rose Farm Barn and Market Street, Tunstead, as one of the areas that has</p>

	<p>experienced surface water flooding events due to a heavy rainfall where the capacity of the local drainage system was exceeded and where the foul sewer was also overloaded (2013). The surface water flooding/ foul water information contained in this response highlight them as ongoing considerations at the planning application stage, but ones that should not require the designation of Tunstead as an environmentally 'Constrained Small Growth Village'. As with other SGVs, the Council would continue to liaise with Norfolk CC, as the LLFA and Highway Authority, and Anglian Water to ensure that such matters are taken into account as part of any planning application consultation.</p> <p>For information Anglian Water consultation feedback confirms that Tunstead has available dry weather flow headroom to accommodate additional wastewater flows within the Belough WRC catchment.</p> <p>As part of the consultation feedback, the Highway Authority has confirmed that they have no objection to the increase in the number of Small Growth villages as listed under point 12 or the increase in growth from 6% to 9% in all Small Growth Villages as stated in point 13.</p>
Section	Proposed Change 12 - Amend Policy SS1 Spatial Strategy to increase the number of Small Growth Villages (SGVs)
ID	FC493
Response Date	18/12/2024 13:03:00
Consultee Full Name	
Consultee Organisation	Glavenhill Strategic Land
Agent Full Name	Mr Philip Atkinson
Agent Organisation	Director Lanpro Services
Does the Proposed Change contribute to the overall soundness of the Plan?	My client supports the Proposed Change 12 and the inclusion of the additional Small Growth Villages under amended Policy SS1 entitled Spatial Strategy to increase the number of Small Growth Villages (SGVs). As detailed in the Background Paper the village of Langham is particularly suited for inclusion in the amended Policy as it has a good range of local services, leisure and dining facilities, a Primary School with available new pupil capacity. The village also benefits from a number of major employment opportunities including The Harper hotel and restaurant (that currently employs 50+ staff), The Bluebell Public House and numerous holiday accommodation units (all providing unskilled and semi-skilled employment) including Langham Hall Apartments, Church Cottage, The Well Barn, Langham Barn, Davids Barn, etc, The village also includes a Village Hall and St Mary's Church as a Place of Worship and the Glavenhill proposals for the North Street site also include a new retail store to be delivered as a benefit linked to the site in the centre of the village.
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	My client would like to attend the reconvened Examination in Public to discuss all the matters raised in this letter in respect of windfall development in Langham.
Include files	
Officer Summary	Support: supportive of the approach to increase the number of SGVs. In particular, Langham is well suited to be included due to its good range of existing services, facilities and employment opportunities. Glavenhill proposals for a site on North Street include a new retail shop.
Officer Response	Support noted.
Section	Proposed Change 12 - Amend Policy SS1 Spatial Strategy to increase the number of Small Growth Villages (SGVs)
ID	FC557
Response Date	18/12/2024 15:03:00
Consultee Full Name	Richard Doleman

Consultee Organisation	Principle Infrastructure Development Planner Norfolk County Council (Highways)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	The Highway Authority has no objection to the increase in the number of Small Growth villages as listed under point 12 or the increase in growth from 6% to 9% in all Small Growth Villages as stated in point 13.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	Support/ General comment: no objection to the increase in the number of Small Growth villages as listed under point 12 or the increase in growth from 6% to 9% in all Small Growth Villages as stated in point 13.
Officer Response	Comment noted.
Section	Proposed Change 12 - Amend Policy SS1 Spatial Strategy to increase the number of Small Growth Villages (SGVs)
ID	FC598
Response Date	24/12/2024 09:57:00
Consultee Full Name	Mr Harry Skinner
Consultee Organisation	Planning Advisor (Sustainable Places Team) Environment Agency - Sustainable Places
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>We note that the proposed changes outlined in this consultation document include new site allocations for Small Growth Villages.</p> <p>For these new allocations, the sequential approach should be applied and there should be a consideration of flood risk, given the policy guidance paragraphs listed below from the NPPF (Dec 2024 update):</p> <ul style="list-style-type: none"> • Para 170 directs that <i>“inappropriate development in areas of flood risk should be avoided by directing development away from the areas at highest risk (whether existing or future)”</i>. • Para 172 states that <i>“all plans should apply a sequential, risk-based approach to the location of development, taking into account all sources of flood risk”</i>. • Para 174 states that <i>“The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding”</i>. <p>It has been noted that the assessment of each individual village in the Addendum to Background Paper 2: Distribution of Growth (Small Growth Villages) does include flood risk rationale for site appraisal. We are satisfied that Policy CC 7 (Flood Risk & Surface Water Drainage) as the overarching policy for all forms of development will require the consideration of flood risk in further detail (e.g. the Sequential and Exception Tests and the requirement of an FRA).</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	

<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>Include files</p>	
<p>Officer Summary</p>	<p>General comments: notes that the proposed changes outlined in this consultation document include new site allocations for Small Growth Villages. For these new allocations, the sequential approach should be applied and there should be a consideration of flood risk, given the policy guidance at paragraphs 170, 172 and 174 of the NPPF (Dec 2024 update). It is noted that the assessment of each village in the Addendum to Background Paper 2: Distribution of Growth (Small Growth Villages) does include flood risk rationale for site appraisal. We are satisfied that Policy CC 7 (Flood Risk & Surface Water Drainage) as the overarching policy for all forms of development will require the consideration of flood risk in further detail (e.g. the Sequential and Exception Tests and the requirement of an FRA).</p>
<p>Officer Response</p>	<p>Comments noted.</p> <p>For information the consultation document proposes 10 additional SGVs and proposed to increase the percentage of growth for the SGVs from 6 to 9%. It does not include new site allocations for SGVs, as suggested. However, as acknowledged by the EA response, Policy CC7 Flood Risk & Surface Water Drainage will require the consideration of flood risk in further detail (sequential and exceptions tests and requirement of a FRA).</p>

Proposed Change 13 - Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages

Section	Proposed Change 13 - Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages
ID	FC30
Response Date	14/11/2024 14:31:59
Consultee Full Name	Mr Gavin Paterson
Consultee Organisation	Director Worstead Estate
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>The proposed change could be more sustainable because they only provides villages with a relatively small increase in housing stock. It would be more sustainable to increase the number of dwellings in a village to enable the justification of services such as a shop to reduce travel and support existing services. Moreover, badly needed housing stock is required.</p> <p>Specifically Worstead Village has almost no housing between the historic village centre and the village railway station. A larger well strutured housing development could better connet the existing housing to the railway station, justify retail space in the village and support existing village enterprises such as the pub, village hall and school with more footfall.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	<p>Support: Proposed Change 13 in terms of additional housing could be seen as sustainable. It would be more sustainable to increase the number of dwellings in a village to help support the services and facilities. Moreover, housing stock is badly needed.</p> <p>General comment: Worstead has no existing housing between it's historic centre and the train station. A larger well designed housing development here would help connect the two and support local services.</p>
Officer Response	<p>Agree: for the principle of increasing the percentage growth to 9%. Worstead is proposed as one of the 10 additional Small Growth Villages under Proposed Change 12.</p> <p>General comment: Under Proposed Change 13 Worstead would have a proposed indicative housing allowance of 42 dwellings, which is appropriate particularly in terms of infrastructure, for the Small Growth Village tier of the settlement hierarchy. Policy SS1 of the Local Plan directs larger scale growth to the higher order settlements where there is the appropriate catchment to support many more services. SGVs will support local daily needs.</p>
Section	Proposed Change 13 - Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages
ID	FC50
Response Date	21/11/2024 11:28:00
Consultee Full Name	Mr David Burns
Consultee Organisation	
Agent Full Name	
Agent Organisation	

Does the Proposed Change contribute to the overall soundness of the Plan?	The increase to 37 new houses for Trunch comes with no settlement boundary change, or comment on how it will be achieved. The areas identified as potential development in Trunch will be mostly 'infill' and therefore counts as windfall and not contribute to the new target. So how does NNDC see the number being achieved in GTrunch as the local plan does not explain so???
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	I believe a target should be SMART and this is not, if the settlement boundary is to be extended we need to know now.
Include files	
Officer Summary	General comment: questions how housing would be delivered in Trunch or where such development would be located without a change to the settlement boundary. Potential development would mostly be infill and counted as windfall, which would not count towards the indicative housing allowance (37 dwellings).
Officer Response	<p>General comment: The designation of Trunch and its settlement boundary has already been through examination and are not part of the current consultation in this regard. Policy SS1 Spatial Strategy of the emerging Local Plan does not allocate sites for Small Growth Villages, growth would be through appropriate planning applications that accord with Policy SS1 and the wider Local Plan. Any such residential development proposals will need to meet the requirements of criterion 3 of Policy SS1, which include that the site must immediately abut the defined settlement boundary.</p> <p>Settlement Boundary Reviews have been carried out for the existing and proposed Small Growth Villages. The existing 23 Small Growth Villages boundary review Background Paper 11 can be found in the Local Plan Examination Library on the Council's website under Section 4.1: Evidence background papers. For information, the defined settlement boundary for Trunch can be viewed within this Background Paper.</p> <p>The matter of infill development was discussed at the examination hearings and the Inspector concluded in his Initial Findings letter [Examination ref. EH006(f)] at paragraph 43, that under Policy SS1 criterion 2, windfall sites in the Small Growth Villages will now count towards a separate total (and not the indicative housing allowance).</p>
Section	Proposed Change 13 - Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages
ID	FC84
Response Date	25/11/2024 15:06:00
Consultee Full Name	Mr Christopher John Bridgman
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	I note that the number of homes suggested for both Runtons has been increased from 49 to 64. However, the land in EAST RUNTON adjacent to Clifton Park in Cromer has been suggested for 70 homes. This land is in EAST RUNTON and this is more than the total of homes proposed for both villages. If the land in EAST RUNTON adjacent to Clifton Park is adopted this would change the status of EAST RUNTON as a small growth village and this is not justified. If the land in EAST RUNTON adjacent to Clifton Park is adopted there should be no further building in either of the villages during the duration of the plan.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	

Include files	
Officer Summary	Object: Notes the combined indicative housing allowance for East Runton and West Runton has increased to 64 dwellings and that the proposed Clifton Park site allocation is within the parish boundary of East Runton, which has a proposed capacity of 70 dwellings and consequently more than the SGV allowance for both villages. If adopted, the Clifton Park site allocation should mean that no further building in both East Runton and West Runton is required for the duration of the Plan.
Officer Response	Disagree: Support for Site C10 Clifton Park is put forward in order to restrict further growth in the Parish of East Runton. The SGV approach is in addition to site allocations, which in this case is part of the Cromer allocations. The operation of Policy SS1 Spatial Strategy does not relate to parish boundaries but relies upon the defined settlement boundaries for the Selected Settlements. The defined settlement boundaries, including for Cromer and East Runton can be found on the Policies Map [Examination ref. A2]. In addition, settlement boundary reviews for the Small Growth Villages are evidenced in Background Paper 11 [Examination ref.C11]. Given the settlement boundaries for Cromer and East Runton, the proposed site allocation at Clifton Park, adjacent to the settlement boundary of Cromer, would be in accordance with Policy SS1 and would not conflict with the operation of the Small Growth Village approach set out in criterion 3 of the policy.
Section	Proposed Change 13 - Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages
ID	FC86
Response Date	25/11/2024 16:11:00
Consultee Full Name	Mrs Margaret Bridgman
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Small growth villages</p> <p>The original allocation to the villages of East and West Runton was 46 houses. This has been increased to 64.</p> <p>However it has been suggested that land adjacent to Clifton Park should be developed. THIS LAND IS IN EAST RUNTON. Any potential building on this land should therefore be considered in relation to the stated policy for small villages.</p> <p>If the land in EAST RUNTON next to Clifton park is approved this will take the entire allocation and it should be properly considered under small village not sneaked in as if it was part of Cromer.</p> <p>If the land in EAST RUNTON adjacent to Clifton Park is approved it will mean that if the council follows its own guidelines nothing else will be able to built. within either of the Runtons. There are better sites within the villages which would allow anyone who bought the houses to integrate within the community better than this site.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	<p>Object: Notes the combined indicative housing allowance for East Runton and West Runton would be increased to 64 dwellings and that a site adjacent to Clifton Park is being proposed for development, which is within the parish boundary of East Runton. States that the site allocation should be taken into account in relation to the SGV indicative allowance for both East Runton and West Runton, meaning nothing else would be built.</p> <p>Comments that there are better sites within the villages, which would allow new occupants to be better integrated within the community.</p>

Officer Response	<p>Comments noted.</p> <p>The SGV approach is in addition to site allocations which in this case is part of Cromer (site C10 Clifton Park). The operation of Policy SS1 Spatial Strategy does not relate to parish boundaries but relies upon the defined settlement boundaries for the Selected Settlements. The defined settlement boundaries, including for Cromer, East Runton and West Runton can be found on the Policies Map [Examination ref. A2]. In addition, settlement boundary reviews for the Small Growth Villages are evidenced in Background Paper 11 [Examination ref. C11]. Given the settlement boundaries for Cromer and East Runton, the proposed site allocation at Clifton Park, adjacent to the settlement boundary of Cromer, would be in accordance with Policy SS1 and would not conflict with the operation of the Small Growth Village approach set out in criterion 3 of the policy.</p> <p>Any sites within the settlement boundaries of East Runton and West Runton can come forward as infill development and would be counted separately as windfall. This approach was concluded by the Inspector in his Initial Findings letter [Examination ref. EH006(f)] at paragraph 43.</p>
Section	Proposed Change 13 - Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages
ID	FC144
Response Date	05/12/2024 19:30:00
Consultee Full Name	Mr Edward Witton
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Does the Proposed Change contribute to the overall soundness of the Plan? Yes</p> <p>Para 79 of the NPPF advises that housing should be located to enhance or maintain the vitality of rural communities. Opportunities should be identified for villages to grow and thrive, especially where this will support local services, and where there are groups of smaller settlements, development in one village may support services in a village nearby. The Inspector commented that the plan's policy for smaller villages, even some with key services, are unusually restrictive.</p> <p>This omission needs to be addressed to ensure that the plan is considered to be:</p> <ul style="list-style-type: none"> - Positively prepared - Effective - Justified - Consistent with national policy - Para 79 of the NPPF refers <p>Nobody living within North Norfolk wishes to see the rural nature of the area desecrated by more significant developments within designated Countryside areas. Nevertheless, whilst partly addressing the shortfall of housing identified by the Inspector, the Council has chosen to ignore para 49 of his findings. The inspector correctly identifies the need to maintain the vitality of smaller villages and hamlets which in turn help to sustain the selected small villages included in the plan. Like Breckland, North Norfolk has diverse small villages which have steadily lost their key services over years of non development for a variety of reasons, but not least limited employment opportunities. This process of gradual diminution towards extinction will only be accelerated by a rigid policy which fails to recognise the potential for some rejuvenation, that could be made possible by modern technology and the ability to work from home. As it stands, these tiny communities are rapidly becoming holiday village enclaves.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	To provide the opportunity to emphasise the need for growth and diversity in smaller rural communities. Unless there is plan in place to provide the support that's needed they will cease to be communities and will die - they will be occupied by holiday home owners as has already happened in other locations in North Norfolk.
Include files	

Officer Summary	Support (partial) and object (partial): Agrees that Proposed Change 13 will contribute to the overall soundness of the Plan, in accordance with paragraph. 79 of the NPPF (2021), but is concerned that the gradual diminution of villages will continue with such a rigid policy approach for SGVs, which does not recognise the potential for some rejuvenation that could be provided through modern technology and the ability to work from home. Such small villages are rapidly becoming holiday village enclaves.
Officer Response	Note: the NPPF paragraph referred to is now contained within paragraph 83 of the December 2023 version of the NPPF. Disagree: The proposed change is in direct response to the Planning Inspector's comments regarding the approach to Small Growth Villages in his Initial Findings letter [Examination ref.EH006(f)]. The proposed change would add a further 10 villages to the existing list of 23 Small Growth Villages (SGV), providing a total of 33 villages across the district the opportunity for small scale sustainable growth, in alignment with para. 83 of the NPPF. These remain the most sustainable and appropriate settlements to support the rural community of North Norfolk. SGV selection follows a set methodology as detailed in Background Paper 2 Distribution of Growth [Examination ref C2] which has been revised in line with the Planning Inspectors comments in his letter (para. 48 (iii) [Examination ref. EH006(f)], as detailed in Appendix 2 – Distribution of Growth (Small Growth Villages) Addendum [Examination document FC004].
Section	Proposed Change 13 - Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages
ID	FC162
Response Date	07/12/2024 12:32:00
Consultee Full Name	Mr Richard Goldsmith
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	The increase percentage to Roughton under the small village growth is incorrect as the revised proposal for land at Pine Tree Farm C22/2 now incorporates land within the Roughton Parish boundary.
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	My house backs directly onto the proposed development and will have a significant impact on my quality of life
Include files	
Officer Summary	Object: the percentage increase for growth to Roughton as a SGV is incorrect as the revised site allocation at Pine Tree Farm, Cromer (C22/4) now incorporates land within the Roughton Parish boundary. My quality of life will be significantly impacted as my property is directly adjacent to the proposed extended site.
Officer Response	Disagree: The SGV approach is in addition to site allocations which in this case is part of Cromer. The operation of Policy SS1 Spatial Strategy does not relate to parish boundaries but relies upon the defined settlement boundaries for the Selected Settlements. The defined settlement boundaries, including for Cromer and Roughton can be found on the Policies Map [Examination ref. A2]. In addition, settlement boundary reviews for the Small Growth Villages are evidenced in Background Paper 11 [Examination ref.C11]. Given the settlement boundaries for Cromer and Roughton, the proposed extended site allocation at Pine Tree Farm, adjacent to the settlement boundary of Cromer, would be in accordance with Policy SS1 and would not conflict with the operation of the Small Growth Village approach set out in criterion 3 of the policy.
Section	Proposed Change 13 - Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages
ID	FC239

Response Date	13/12/2024 10:20:00
Consultee Full Name	Mr Alan Presslee
Consultee Organisation	Cornerstone Planning Ltd
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	Yes. the proposed increased level of indicative housing growth in Small Growth Villages - from 6% to 9% - will help deliver identified housing need through windfall development, support the sustainable growth of such communities, and contribute to the overall soundness of the Local Plan. In particular the increase in the allowance in the village of Sutton from 30 to 46 dwellings.
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	Support: in general support of the increase from 6% to 9 % growth for the SGVs, which will help support sustainable growth of such communities and particularly in relation to the village of Sutton, where the indicative housing allowance would increase from 30 to 46 dwellings.
Officer Response	Support noted.
Section	Proposed Change 13 - Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages
ID	FC240
Response Date	13/12/2024 09:22:36
Consultee Full Name	Mrs Sarah Lawrence
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	In support of Tunstead being considered as a small growth village. The village has capacity and the need for growth. There is land available in Market Street to develop within existing settlements.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	Support: in support of Tunstead being considered as a Small Growth Village as it has capacity and needs the growth. There is land available in Market Street to develop within existing settlements.
Officer Response	Support noted. The Planning Inspector has set out in his Initial Findings letter [Examination ref.EH006(f)] the requirement for additional housing growth in order to support the rural economy and specifically comments of the need to modify the approach in Policy SS1 Spatial Strategy to Small Growth Villages. Tunstead has been assessed as meeting the requirements

	to be designated as a Small Growth Village, where small scale housing development would help to retain the existing facilities and services and support the future vitality of the village.
Section	Proposed Change 13 - Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages
ID	FC260
Response Date	16/12/2024 10:02:57
Consultee Full Name	Mr Tim Harris
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I am commenting on Proposed Change 13 "Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages". My comments relate to Catfield where the proposed housing growth is from 6% to 9%. This is unacceptable because the plan fails to take into account how changes in our understanding of the underlying hydrology of Catfield and its relationship with the surrounding protected wetlands, which are universally recognised as among the most important and protected wetlands in the UK, have occurred since the draft local plan was prepared. Unfortunately although Catfield is in the NNDC area the surrounding wetlands, although less than 1 KM distant, fall within the Broads Authority area a split responsibility which does not facilitate the understanding of an integrated ecological system. Put succinctly, development in Catfield is controlled by NNDC whereas damage to the adjacent wetlands is in the Broads Authority planning area.</p> <p>The changes in our understanding result from:</p> <ol style="list-style-type: none"> 1. The Environment Agency's Ants Broads and Marshes Restoring Sustainable Abstraction investigation of September 2020. This followed on from the Catfield Fen public inquiry of 2016 which first focused on the relevant water related issues. 2. The resulting cessation of abstraction licenses around Catfield most particularly the Ludham Public Water Supply in 2021 and other agricultural licenses. This is resulting in an increase in the underlying groundwater table under Catfield which supports the surrounding wetlands. The full effect of this rise has not yet been determined. 3. The severe flooding experienced in 2023/24 which closed Catfield School 5 times and was acknowledged to be caused by a combination of high surface water and groundwater flows. It is also relevant that Catfield is a "dry island" site and many of the potential building sites in the parish are ruled out being in flood zone 2. <p>The changes in our understanding of Catfield's underlying hydrology and its relevance to future development in the village were recognised by NNDC's and the BA's environmental specialists in their objections to a proposed development of 18 houses in Lea Road, Catfield (PF/21/1749). The relevant papers which merit detailed study are:</p> <ol style="list-style-type: none"> i. Kerys Witton, NNDC's Landscape Officer of 21.2.22. ii. Cheryl Peel, the BA's Senior Planning Officer of 14.2.22. iii. Ben Jervis NNDC's Senior Landscape Officer of 20.7.22. <p>These papers demonstrate that there are clear pathways from the supporting groundwater catchment underlying Catfield directly into the protected wetlands which demonstrate the risk of damaging pollution from development. Also that the rising groundwater table from the terminated groundwater abstraction licenses noted above is exacerbating this risk.</p> <p>There is no consideration of these risks, and the inevitable concomitant severe inhibition to future potential development in Catfield, in the draft local plan given the unique hydrological conditions of the village surrounded as it is by three of the top wetlands in the country eg Catfield and Sutton Fens and Hickling Broad.</p> <p>The absence of consideration of these issues in the draft local plan is unsurprising because these are NEW features. They are the result not only of NEW scientific research by the relevant bodies eg the EA and Natural England but of testing of the evidence by litigation in the High Court in a successful Judicial Review in September 2022 which resulted in the Catfield Fen instigated scientific analysis being extended by order of the judge throughout the Broads.</p> <p>Conclusion This new evidence confirms that the environmental assessment of Catfield in the draft local plan is out of date, and now deficient, and the proposed housing growth in the revised plan</p>

	for Catfield is unacceptable because of the proven risk to the precious wetlands which surround the village.
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	<p>Object: opposed to a proposed increase in housing growth from 6% to 9 % in relation to Catfield because the assessment/ plan fails to take into account the more recent evidence/ changes in the understanding of the underlying hydrology of Catfield and its relationship with the surrounding protected wetlands, within the Broads Authority area, which are universally recognised as among the most important and protected wetlands in the UK.</p> <p>It is understood that these changes relate to 1) The Environment Agency's Ants Broads and Marshes Restoring Sustainable Abstraction instigation of September 2020; 2) cessation of abstraction licenses around Catfield most particularly the Ludham Public Water Supply in 2021 and other agricultural licenses, that has resulted in an increase in the underlying groundwater table under Catfield which supports the surrounding wetlands 3) the severe flooding experienced in 2023/24, which closed the school 5 times, and that was caused by a combination of high surface water and groundwater flows. It is also relevant that Catfield is a "dry island" site and many of the potential building sites in the parish are ruled out being in flood zone 2.</p> <p>The changes in the understanding of Catfield's underlying hydrology and its relevance to future development in the village were recognised by NNDC's and the BA's environmental specialists in their objections to a proposed development of 18 houses in Lea Road, Catfield (PF/21/1749). There is no consideration of these risks, and the inevitable concomitant severe inhibition to future potential development in Catfield given the unique hydrological conditions of the village surrounded as it is by three of the top wetlands in the country eg Catfield and Sutton Fens and Hickling Broad.</p> <p>These issues are the result not only of new scientific research by the relevant bodies, ie. the EA and Natural England, but also through the testing of the evidence by litigation in the High Court in a successful Judicial Review which resulted in the Catfield Fen instigated scientific analysis being extended by order of the judge throughout the Broads. This new evidence confirms that the environmental assessment of Catfield in the draft local plan is out of date, and now deficient, and the proposed housing growth in the revised plan for Catfield is unacceptable because of the proven risk to the precious wetlands which surround the village.</p>
Officer Response	<p>Comments noted.</p> <p>Policy SS1 Spatial Strategy of the emerging Local Plan does not allocate sites for Small Growth Villages, but provides an indicative housing allowance and directs that such growth would need to meet the requirements of criteria 3 of Policy SS1. The SGV approach allows the opportunity for a number of small scale proposals to come forward in Catfield during the lifetime of the Plan, rather than a prescribed single site allocation that would be required to deliver a larger housing scheme, like the scheme cited (PF/21/1749 – proposal for 18 dwellings).</p> <p>The Council acknowledges the potential constraint to development in and around Catfield, and that the final depth of groundwater in the area remains unknown subject to further monitoring and modelling by the EA. However, it is considered that this constraint does not impose a blanket ban on all development in relation to Catfield as a SGV. It would be at the planning application stage that it a proposal would need to demonstrate that there would be no impacts upon the underlying groundwaters. As such, impacts upon any relevant land would be considered on a case-by-case basis as and when individual applications are submitted, and would be based on the most up to date information available regarding groundwater levels at that point in time. On this basis, the Council is satisfied that, at the strategic level, the proposed growth of 39 dwellings over the plan period (2024-2040) could be accommodated without detrimentally impacting nearby designated sites.</p> <p>For information, the Broads Authority (BA) and Environment Agency (EA) have been consulted on the emerging Local Plan and Further Consultation proposals and have not raised any specific concerns about the proposed increase in the percentage of housing growth in Catfield. It is noted that Anglian Water have confirmed that Catfield does not having capacity to accommodate additional flows from proposed growth and that there is no proposed growth scheme within AW's PR24 Business Plan for AMP8 (2025-30). As such, growth would need to be phased for later in the plan period to align with future investment at the WRC's in subsequent AMPs.</p>

Section	Proposed Change 13 - Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages
ID	FC292
Response Date	16/12/2024 12:59:34
Consultee Full Name	Mr David Hooker
Consultee Organisation	Councillor Aldborough and Thurgarton Parish Council
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILE Suitability of certain identified sites e.g some are water meadows.
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	Consultation 6.docx
Officer Summary	Object: Opposed to limited residential development for the following reasons. Attached document recognises the importance that Aldborough is likely to benefit from additional housing for the local community and is mindful of its Conservation Area designation. Refers to a number of sites identified through Call for Sites. Details a number of concerns in that some of the areas identified have high water tables and can be saturated after heavy rain with the concern that this may increase the risk of flooding in the village. There would need to be some sort of mitigation, ie. improvements to drainage culverts, particularly as the existing drainage and water infrastructure has difficulty coping. This needs to be a prime consideration for any new development. The village also suffers from power outages every winter, public transport is very limited and there are issues with vehicular and pedestrian access (also to the school), where it would be helpful for new development to help with mitigating these problems, ie. a small visitors car park for the village. Concerns about capacity at GP surgery and from increased second home ownership which increases local housing prices. Parish council preference is for affordable housing (social rent and part buy) for local people/families.
Officer Response	Disagree: The designation of Aldborough as a SGV and its settlement boundary have already been through examination and are not part of the current consultation. As set out in Policy SS1 of the Submitted Local Plan, SGVs do not have site allocations, but instead have an indicative housing allowance where a site can come forward provided a planning application satisfies the requirements of criteria 3 of the policy. For information, the defined settlement boundary for Aldborough can be viewed within the Settlement Boundary Review (SGVs) Background Paper 11 [Examination ref. C11]. It will be through the submission of a planning application that any site specific constraints would be considered as part of the assessment process.
Section	Proposed Change 13 - Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages
ID	FC300
Response Date	15/12/2024 11:01:00
Consultee Full Name	Dan Futter
Consultee Organisation	Parish Clerk Weybourne Parish Council
Agent Full Name	
Agent Organisation	

Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Weybourne Parish Council objects to the designation of Weybourne as a Small Growth Village (SGV). One of the requirements for this definition is the existence of local services:</p> <p><i>"Small Growth Villages - smaller villages with a limited range of facilities including either a school or a village shop, but not both, and a limited range of day to day services meeting the needs of the settlement but not the wider area."</i></p> <p>Weybourne was previously designated as a SGV due to the presence of a convenience store. However, since the original Local Plan, the Village Store has changed hands and has been changed to "Ali's" and is now largely a café/restaurant, with a very limited range of foodstuffs. Moreover, the opening hours have now been reduced significantly, especially in the winter months, such that it can no longer be defined as a convenience store.</p> <p>We therefore request that Weybourne is removed from the list of Small Growth Villages in the finalised Local Plan.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	<p>Object: The Parish Council objects to Weybourne being identified as a SGV as since its previous identification, the village shop is now largely a café/ restaurant with a very limited range of foodstuffs and the opening hours have reduced significantly, such that it can no longer be defined as a convenience store. Respondent therefore requests removal of Weybourne from the list in the finalised local plan.</p>
Officer Response	<p>Disagree: The designation of Weybourne and its settlement boundary has already been through examination and are not part of the current consultation. Policy SS1 Spatial Strategy of the emerging Local Plan provides the opportunity for proportionate growth of Small Growth Villages through appropriate planning applications that accord with policy SS1 and the policies of the wider local plan. Any such residential development proposals will need to meet the requirements of criterion 3 of Policy SS1.</p> <p>The Parish Council is undertaking a Neighbourhood Plan (NP) in accordance with the recently designated Neighbourhood Planning Area. Through the NP it is understood the Parish Council will be seeking to bring forward growth in order to help sustain the local economy and the vibrant local community which is based around the local businesses, shops and services. This will be done in part to ensure there is a balance of housing that provides homes for a wide range of ages and incomes. This is entirely in line with the designation as Small Growth Village in the Local Plan and the policy approach set out in SS1. This policy sets a housing requirement but includes no specific allocation(s), at this level. The NPPF requires the LPA to set out policies and approaches in the Local Plan that support the rural economy and set an appropriate framework to deliver the growth that is necessary to meet the Districts existing and future identified needs for all types of development. The continued identification of Weybourne as a SGV is aligned with these aims.</p>
Section	Proposed Change 13 - Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages
ID	FC319
Response Date	17/12/2024 10:45:30
Consultee Full Name	
Consultee Organisation	White Lodge (Norwich) Ltd
Agent Full Name	Mr Sam Hazell
Agent Organisation	Senior Planner Lawson Planning Partnership
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>In summary, it is considered that the majority of the main soundness issues relating to draft Policy SS1, raised by the Local Plan Inspector in his letter to the Council, dated 24th May 2024, have not been addressed in the current consultation. In addition, it is considered that</p>

	<p>Proposed Change 13 does not address the Inspector's concern regarding the proposed strategy for securing sustainable growth in the District's Small Growth Villages (SGVs).</p> <p>Consequently, the draft Plan requires further amendment in order to meet NPPF soundness tests and to help facilitate the redevelopment of our client's site, as set out in the detailed representations below. Without such amendment, we wish to maintain our client's objection to the draft Plan.</p> <p>To address the matters raised by the Inspector and the soundness concerns previously raised by LPP, we request that Policy SS1, part 3 is amended to read as follows:</p> <p><i>Policy SS1, Part 3</i></p> <p><i>Outside of the defined boundaries of Small Growth Villages residential development will be permitted only where all of the following criteria are satisfied:</i></p> <p><i>a. The site immediately abuts <u>is adjacent to</u> the defined Settlement Boundary;</i></p> <p><i>b. The number of dwellings proposed meets a proven local need for housing combined with those already approved since the date of adoption does not increase the numbers of dwellings in the defined settlement by usually more than 6% as outlined in Table 2 'Small Growth Villages Housing Apportionment'; and,</i></p> <p><i>c. The proposal is small scale, incremental growth compatible with the form and character of the village and its landscape setting in terms of siting, scale, design, impact on heritage assets and historic character; and,</i></p> <p><i>d. Safe and convenient access can be provided; and,</i></p> <p><i>e. The proposal incorporates substantial community benefits, including necessary infrastructure and service improvements and improved connectivity to the village and wider GI network; and,</i></p> <p><i>f. Suitable schemes that would deliver affordable housing in excess of the normal Policy HOU2 requirement will receive particularly favourable consideration. In the case of sites in excess of 0.25 hectares, the site, together with any adjacent developable land, has first been offered to local Registered Social Landlords on agreed terms which would allow its development for affordable homes, and such an offer has been declined.</i></p> <p>Please see attached supporting representations letter dated 17th December 2024 for further details.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	<p>Yes</p>
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	<p>In accordance with our legal right to appear before and be heard by the Inspector at the hearing, we wish to elaborate on our representations, which set out the changes we have requested to the strategy approach and the identified interrelated policies that are required to make the plan sound.</p>
<p>Include files</p>	<p>LPP313_NNLPFurtherConsultationReps_17.12.24.pdf</p>
<p>Officer Summary</p>	<p>Object: It is considered that the majority of the main soundness issues relating to draft Policy SS1, raised by the Local Plan Inspector in his letter to the Council, dated 24th May 2024, have not been addressed in the current consultation. In addition, it is considered that Proposed Change 13 does not address the Inspector's concern regarding the proposed strategy for securing sustainable growth in the District's Small Growth Villages (SGVs).</p> <p>Consequently, the draft Plan requires further amendment in order to meet NPPF soundness tests and to help facilitate the redevelopment of our client's site, as set out in the detailed representations. Without such amendment, we wish to maintain an objection to the draft Plan.</p> <p>Details of changes to criteria 3 of Policy SS1 requested and commented upon in the accompanying document at paragraph 4. Paragraphs 5 – 9 refer to the Inspectors and council's letters post hearings in relation to the actions needing to be taken particularly in relation to Policy SS1. Considers that all of the amendments to Policy SS1 should have been included as part of this consultation in order to ensure that the policy is justified and effective.</p> <p>Comments on the main soundness concerns not included in the consultation and additional comments (paras. 16 – 29) of accompanying document. Summary and conclusion stating that respondent is seeking amendments to the wording of Policy SS1 in order for the plan to be sound (detailed in Appendix 1 of document).</p>
<p>Officer Response</p>	<p>Disagree: The suite of proposed changes set out in the Further Consultation are in direct response to the Inspectors Initial Findings letter [Examination ref.EH006(f)], and where the Inspector has accepted the principle of the Council's Action Plan and within that has accepted the principle of the Small Growth Village approach on the proviso of some modifications, and which the Inspector in his further letter of 30 August 2024 [Examination ref. EH006(h)]</p>

	<p>acknowledged that the wording of criteria 3(f) of Policy SS1 can be discussed at further public hearings. In that regard, the comments in relation to the wording of Policy SS1 are noted, but do not form part of this current consultation particularly as they relate to one criterion within a wider policy, where the full suite of relevant policy modifications require consideration in a cumulative and comprehensive way rather than via an incremental approach.</p> <p>For information, Proposed Change13 is not the only direct change specifically to the SGV tier of the settlement hierarchy in Policy SS1 within the consultation document. Proposed Change 12 also proposes a further 10 additional Small Growth Villages, extending the number of SGVs to 33 settlements.</p>
Section	Proposed Change 13 - Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages
ID	FC335
Response Date	16/12/2024 17:36:00
Consultee Full Name	
Consultee Organisation	Ash Properties Ltd
Agent Full Name	Joe Haines
Agent Organisation	Savills
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>I write on behalf of Ash Properties Ltd. to submit comments related to the Small Growth Villages strategy. High Kelling is allocated in the original Reg 19 submission for 17 new homes but the location of those new homes is not defined. In its response to the Inspector's findings the Council has reviewed what qualifies as a Small Growth Village and the boundaries of Small Growth Villages to increase housing provision.</p> <p>It seems to me that High Kelling has the potential to deliver a greater number of dwellings than 17 and the Local Plan should be amended accordingly. The planning application pending consideration (ref. PF/24/1892) proposes 35 new dwellings in existing buildings and the supporting documents demonstrate that this is sustainable development.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	Support/general comment: Supports High Kelling as a SGV but comments that the Reg 19 allocation for 17 dwellings was not for a defined site and considers that High Kelling has the potential to deliver even more growth, with reference to current planning application PF/24/1892 for 35 dwellings by the conversion of existing buildings, where the associated documentation supports sustainable development.
Officer Response	<p>Disagree: The designation of High Kelling and its settlement boundary has already been through examination and are not part of the current consultation. Policy SS1 Spatial Strategy of the emerging Local Plan provides the opportunity for proportionate growth now proposed at 9% in Small Growth Villages through appropriate planning applications that accord with policy SS1 and the policies of the wider local plan. The level of growth proposed is proportionate to the level of services and facilities of SGVs, and their lower position within the settlement hierarchy set out in Policy SS1 of the Local Plan. Any such residential development proposals will need to meet the requirements of criterion 3 of Policy SS1.</p> <p>Given that Policy SS1 of the emerging policy has received significant objections and will be subject to main modifications and as such, have not consulted upon, no weight can be placed upon it in relation to the planning application referred to.</p>
Section	Proposed Change 13 - Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages
ID	FC374
Response Date	18/12/2024 11:20:04

Consultee Full Name	Mrs Susie Cunningham
Consultee Organisation	Clerk Catfield Parish Council
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>No. The focus of the Parish Council's ("PC") response to the Consultation is Proposed Change 13 – "Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages". Catfield has been designated as a Small Growth Village in the draft local plan. The consequence of Proposed Change 13 for Catfield would be an increase in its "Indicative Housing Allowance" from 27 to 39 dwellings. The PC submits that this proposed increase is not acceptable for the following reasons:</p> <p>A. Environment</p> <p>There are several background papers referred to in the Consultation. Background Paper 2 – Distribution of Growth – was first published in January 2022 and was updated in May 2023. This background paper provides an analysis of each Small Growth Village based on several factors, including the level of Services and Facilities in the village and Environmental and Infrastructure Constraints. Regarding Environmental and Infrastructure Constraints, it is stated that a detailed environmental assessment of all settlements has been carried out. These assessments considered the degree to which growth in each of the settlements might be constrained having regard to the following matters: Historic Environment; Flood Risk; Coastal Erosion; Environmental Designations; Landscape Character. Environmental constraint was divided into three categories: Highly, Moderately and Limited. The PC submits that the information provided in the environmental assessment of Catfield is out of date and needs further expansion as follows:</p> <ol style="list-style-type: none"> 1 Since the draft version of the Local Plan was prepared there have been several significant developments which have greatly increased the PC's understanding of the hydrological issues relating to Catfield village and the surrounding protected wetlands. These need to be specifically addressed when assessing Catfield's suitability for future housing. <p>These developments are:</p> <ul style="list-style-type: none"> • A greater focus on, and understanding of, the importance of the protected wetlands surrounding Catfield, informed by the Catfield Fen Public Inquiry in 2016, the Environment Agency's (EA) Ant Broads and Marshes Restoring Sustainable Abstraction (ABM RSA) investigation of September 2020 and the successful Judicial Review in the High Court in September 2022 which extended the RSA's conclusions throughout the Broads. • The EA's ABM RSA has led to the cessation of several abstraction licences including the Ludham Public Water Supply in April 2021 which is having a significant effect in raising the underlying groundwater levels beneath the village. • It is acknowledged that the severe flooding experienced in the winter of 2022/23 in Catfield was caused by both a combination of high surface water and groundwater flows. <ol style="list-style-type: none"> 1 Catfield unique environmental position. <ul style="list-style-type: none"> • The village is closely surrounded by what are universally recognised as some of the most important wetland sites in England which have the highest level of national and international conservation protection e.g. Catfield and Sutton Fens and Hickling Broad; all SSSI's, part of the Broads Special Area of Conservation (SAC) and Broads Special Protection Area (SPA) and wetlands of international importance under the Ramsar Convention (Ramsar Site). • Less widely appreciated is that Catfield village sits on top of the small water catchment area that is crucial to the support of these wetland sites which for administrative purposes fall into the Broads Authority Planning (BA) area not North Norfolk District Council's (NNDC). • It is increasingly recognised that the groundwater table underlying Catfield village is close to the surface and rising as local groundwater abstraction licences have been terminated to protect the wetland sites, e.g. cessation of the Ludham PWS in 2021 and the failure to renew several other local agricultural abstraction licences as outlined in the EAs ABM RSA programme which is currently being implemented. 1 Recognition of hydrological issues by NNDC's officers in recent ecological objections to development in Catfield. <ul style="list-style-type: none"> • It is noteworthy that planning officers have taken notice of the recent developments set out in section 1 above and have referred to them when opposing planning permission

for 18 new houses at Lea Road, Catfield (PF/21/1749) which was the most substantial proposal for new housing construction in Catfield in recent years. This new focus on the adverse implications for the protected wetlands puts in question the desirability and practicality of any new housing development in Catfield.

There are several examples of this:

- Kerys Witton, NNDC's Landscape Officer, in her objection to the proposed Lea Road development of 18 houses in Catfield of 21.2.22, commented on the Shadow Habitats Regulations Assessment (HRA), dated 24.2.20, of the Lea Road Development which Norfolk Wildlife Services had prepared for the developer. The HRA stated that "There is no pathway from the Scheme to the SPA, which is 0.9km distant, by which noise, lighting, air or water pollution arising from the Scheme may travel; all of these potential effects would be significantly diluted or dispersed before reaching the SPA". Kerys Witton refuted this assertion and stated that, "This statement and evidence is incorrect as there are potential pathways from the development site to the European/Ramsar sites, via the infiltration of surface water from the development into groundwater, which in turn could affect the hydrological features and processes of the qualifying features." She further stated that "The quality, quantity and flow of groundwater is an important supporting function/process of the European and Ramsar sites and it is important to understand if the changes that will occur to the groundwater as a result of the development will affect the supporting function and processes of the features of the European and Ramsar sites in order to establish if a significant effect is likely".
 - Cheryl Peel, the BA's Senior Planning Officer, made a similar point in her submission of 14th February 2022; "We note that the HRA states that "all surface water will be fully attenuated and there will be no connection to Natura 2000 sites hydrologically. We can see no supporting evidence for this conclusion."
 - Ben Jervis, NNDC'S new Senior Landscape Officer confirms these comments (Lea Road objection dated 20.7.22.). He states that, " It is considered previous Landscape Officers comments remain valid: there will be a pathway between the site and groundwater." He goes on further to confirm the important point that groundwater levels are rising. "The current intention is for these licence changes to come into effect in autumn 2024, and groundwater levels are therefore anticipated to rise due to the decrease in abstraction. Therefore, in due course, the existing hydrological connectivity of the site to the Broadland/Ramsar and Broads SAC would be increased and potential for water pollution amplified."
- 1 The implications of flooding in winter 2023/24. Catfield School flooded 5 times during the last winter as the result, confirmed by the Norfolk County Council (NCC) flooding experts who were consulted, of both surface water running in from the surrounding fields and a rise in groundwater. As this caused the sewage system to back up, the school had to shut on several occasions.
 - There were also incidents of toilets backing up in Thorn Road, Catfield in a similar manner to those in Hickling, which received more publicity.
 - Two further Anglian Water foul water substations in Wood Street and Staithe Road, Catfield, which is close to Hickling, were also overwhelmed by a combination of surface and groundwater flooding. This was reported by the PC to Anglian Water and the EA at the time.
 - 1 Dry Island and the need to update Flood modelling.
 - The North Norfolk Strategic Flood Risk Assessment (November 2017) identified Catfield as a "dry island" in Flood Zone I, completely surrounded by Zone 2 flooding which includes, and therefore rules out, a good number of the potential housing development sites in the village. Given the experiences of winter 2023/4 and the evidence of rising sea levels owing to Global Warming it is appropriate that the flood modelling be rigorously and continually updated to reflect recent events and to gain a better understanding of risk in Catfield, a village in which hydrological issues are of such importance.
 - The Local Plan needs to be updated and revised in view of the Report, entitled "National Assessment of Flood and Coastal Erosion Risk in England 2024", published by the Environment Agency on 17th December 2024.

Based on the above, the PC submits that Catfield should be categorised as "Highly Constrained" in terms of environmental issues.

B. Indicative Housing Allowance

The PC notes that the Plan Period has been amended and now covers the period 2024 – 2040. Catfield's proposed Indicative Housing Allowance is 39 dwellings over the plan period. In July 2024 planning permission was granted for 21 dwellings on the site of the former Milestones hospital in the village.

The PC is of the view that due to the environmental constraints detailed above, the figure of 39 new dwellings is not sustainable. However, if the proposed Indicative Housing Allowance for Catfield is not removed or amended, the PC submits that the figure of 39 is either reduced

	<p>by 21 dwellings or that it is expressly acknowledged that the 21 dwellings, for which planning permission was granted during the plan period, are included in the Indicative Housing Allowance of 39.</p> <p>If the 21 dwellings are not included in the 39, this would mean that, in reality, the Indicative Housing Allowance for Catfield is 60. Catfield is designated as a Small Growth Village and this figure would be totally disproportionate to Catfield's classification. It is significant that in the neighbouring village of Ludham, classified as a Large Growth Village, Proposed Change 10 makes provision for 60 new dwellings over the plan period.</p> <p>Despite the environmental constraints set out above, Catfield is also designated as an employment growth area by both NNDC and NCC. This further adds to the disproportionate increase in development, both industrial and residential, in what is categorised as a Small Growth Village.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	To support the comments and examples submitted for this proposed change.
Include files	
Officer Summary	<p>Object: The PC submits that the proposed increase in the "Indicative Housing Allowance" for Catfield from 27 to 39 dwellings is not acceptable for a number of reasons.</p> <p>Firstly environmental, as the information provided in the environmental assessment of Catfield is out of date. Since the draft version of the Local Plan was prepared there have been several significant developments regarding the understanding and importance of the hydrological issues relating to Catfield and the surrounding protected wetlands, informed by the Catfield Fen Public Inquiry (2016), the EA's Ant Broads and Marshes Restoring Sustainable Abstraction (ABM RSA) investigation of September 2020 and the successful Judicial Review in the High Court (September 2022) which extended the RSA's conclusions throughout the Broads. The EA's ABM RSA has led to the cessation of several abstraction licences including the Ludham Public Water Supply in April 2021 which is having a significant effect in raising the underlying groundwater levels beneath the village. It is acknowledged that the severe flooding experienced in winter 2022/23 in Catfield was caused by both a combination of high surface water and groundwater flows. Catfield School flooded 5 times, confirmed by the Norfolk County Council who were consulted, of both surface water running in from the surrounding fields and a rise in groundwater. Plus other incidents of</p> <p>Catfield has a unique environmental position. The village is closely surrounded by some of the most important wetland sites which have the highest level of national and international conservation protection e.g. Catfield and Sutton Fens and Hickling Broad; all SSSI's, part of the Broads Special Area of Conservation (SAC) and Broads Special Protection Area (SPA) and wetlands of international importance under the Ramsar Convention (Ramsar Site). In addition, Catfield sits on top of the small water catchment area that is crucial to the support of these wetland sites. The groundwater table underlying Catfield village is close to the surface and rising as local groundwater abstraction licences have been terminated to protect the wetland sites, e.g. cessation of the Ludham PWS in 2021 and the failure to renew several other local agricultural abstraction licences as outlined in the EAs ABM RSA programme which is currently being implemented.</p> <p>Recognition of hydrological issues by NNDC's officers in a recent planning application for 18 new houses at Lea Road, Catfield (PF/21/1749). This new focus on the adverse implications for the protected wetlands puts in question the desirability and practicality of any new housing development in Catfield.</p> <p>Dry Island and the need to update Flood modelling. The North Norfolk SFRA (November 2017) identified Catfield as a "dry island" in Flood Zone 1, completely surrounded by Zone 2 flooding which includes, and therefore rules out, a good number of the potential housing development sites in the village. Given the experiences of winter 2023/4 and the evidence of rising sea levels it is appropriate that the flood modelling be rigorously and continually updated to reflect recent events and to gain a better understanding of risk in Catfield, a village in which hydrological issues are of such importance.</p> <p>The Local Plan needs to be updated and revised in view of the Report, entitled "National Assessment of Flood and Coastal Erosion Risk in England 2024", published by the Environment Agency on 17th December 2024.</p> <p>Based on the above, the PC submits that Catfield should be categorised as "Highly Constrained" in terms of environmental issues.</p> <p>Indicative Housing Allowance. In July 2024 planning permission was granted for 21 dwellings on the site of the former Milestones hospital in Catfield. The PC submits that the indicative</p>

	<p>housing allowance of 39 dwellings is either reduced by 21 dwellings or that it is expressly acknowledged that the 21 dwellings, for which planning permission was granted during the plan period, are included in the Indicative Housing Allowance. If the 21 dwellings are not included it would mean that the Indicative Housing Allowance for Catfield is 60.</p> <p>Catfield is also designated as an employment growth area by both NNDC and NCC. This further adds to the disproportionate increase in development, both industrial and residential, in what is categorised as a Small Growth Village.</p>
Officer Response	<p>Comments noted.</p> <p>Policy SS1 Spatial Strategy of the emerging Local Plan does not allocate sites for Small Growth Villages, but provides an indicative housing allowance and directs that such growth would need to meet the requirements of criteria 3 of Policy SS1. The SGV approach allows the opportunity for a number of small scale proposals to come forward in Catfield during the lifetime of the Plan, which should not necessitate a complex drainage strategy involving infiltration lagoons or basins, unlike a prescribed single site allocation that would be required to deliver a larger housing scheme, like the scheme cited (PF/21/1749 – proposal for 18 dwellings).</p> <p>The Council acknowledges the environmental constraints to development in and around Catfield, and that the final depth of groundwater in the area remains unknown subject to further monitoring and modelling by the EA. However, it is considered that these constraints would not preclude development in Catfield as a SGV. It would be at the planning application stage that a proposal would need to demonstrate that there would be no impacts upon the underlying groundwaters. As such, impacts upon any relevant land would be considered on a case-by-case basis as and when individual applications are submitted, and would be based on the most up to date information available regarding groundwater levels at that point in time. On this basis, the Council is satisfied that, at the strategic level, the proposed growth of 39 dwellings over the plan period (2024-2040) could be accommodated without detrimentally impacting nearby designated sites.</p> <p>For information, the Broads Authority (BA) and Environment Agency (EA) have been consulted on the emerging Local Plan and Further Consultation proposals and have not raised any specific concerns about the proposed increase in the percentage of housing growth in Catfield. The operation of the Indicative Housing Allowance will be from the date of adoption of the Local Plan and as such, the existing planning permission cited would not be counted against the allowance. In addition, if a proposal for new dwellings is located within the settlement boundary it would be recorded as infill development and counted as windfall development - as directed by the Inspector through the previous hearing sessions. This approach to infill development applies to all of the SGVs.</p>
Section	Proposed Change 13 - Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages
ID	FC388
Response Date	18/12/2024 14:24:00
Consultee Full Name	Martin & Margaret Freeth
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Further to the above consultation with regard to the proposal to look at our village, Langham, as a potential small growth village, this letter encapsulates our thoughts in relation to this matter.</p> <p>Langham has been designated as an Area of Outstanding Natural Beauty-which people visit to enjoy the wide open spaces and get away from the towns. By building more houses you are reducing the ONB of this area and therefore, to a certain extent discouraging the natural beauty of the area thereby impacting the reason that people come to this area to enjoy.</p> <p>We don't have strong enough infrastructure to support this amount of new homes. When village at full capacity in the summer (holiday homes used -10% of the houses in the village) the sewage drains struggle to cope and often overflow.</p> <p>The local village school is full to capacity with a waiting list so can't be counted as a facility for any new children in the village if houses are built.</p> <p>The surgery at Blakeney is closing and the nearest surgery is Holt and the bus service isn't good enough to rely on to get to appointments freely.</p> <p>No village shop - the last development was done in Langham by Avada promised to install one but this never happened-so people without cars would need deliveries which equals more traffic through the village.</p>

	<p>The labour government said that they are not going to impinge on green belt whilst delivering their promise for 1.5million new homes in the country- contradictory.</p> <p>Where there has previously been a proposal in the centre of the village (for 35 new homes) there are no natural access points that could be considered safe for use and also there are blind junctions that contain an arterial route through the village which sometimes have over sized lorries coming through. We have recently had significant damage to both personal buildings and to the overhead cabling at the point where an entrance was being proposed.</p> <p>In a meeting at the village hall concerning the proposed development, the majority of people present were against the development on a number of issues, it was felt that 35 homes was too many in such a small space. There is also a very old and large oak tree in the middle of the proposed land that we would hope wouldn't be removed. This area provides a beautiful natural break between the existing housing, which is very much a feature of the villages in North Norfolk, as is evidenced by many of the villages around such as Binham.</p> <p>This plan hasn't been submitted to the council as yet.</p> <p>One of our main concerns with regard to Langham is if Langham becomes a growth village and 15 homes are built at this stage, where does it stop?</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	<p>Concerns: relating to the proposed designation of Langham as a SGV. Langham has a AONB designation. By building more houses you are reducing and, discouraging to an extent, the natural beauty of the area and impacting the reason that people come to enjoy it. There are a number of infrastructure concerns, in relation to the sewerage system not coping in the summer, the village school is at full capacity, poor accessibility to doctors surgery and no village shop. Commentary regarding a proposed housing scheme for 35 dwellings, with concerns about safe access, an existing mature tree on site, and the loss of green space within the village. Poses the question about where the amount/ level of development will stop.</p>
Officer Response	<p>Disagree: Langham has been assessed against the revised methodology and meets the criteria to be identified as a SGV, with an indicative housing allowance of 15 dwellings. The assessment acknowledges the moderate environmental constraints associated with the village, including that the northern part of the village sits within the Norfolk Coast National Landscape (AONB) and that the southern part is adjacent to the designation, but this, in combination would not prevent the opportunity for small scale development within the village. The comments regarding infrastructure are noted but are unevidenced. Such matters would be assessed in detail at the planning application stage alongside all other material considerations.</p>
Section	Proposed Change 13 - Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages
ID	FC390
Response Date	18/12/2024 14:36:00
Consultee Full Name	Paul & Caroline Freeth
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Further to the above consultation with regard to the proposal to look at our village, Langham, as a potential small growth village, this letter encapsulates our thoughts in relation to this matter.</p> <p>Langham has been designated as an Area of Outstanding Natural Beauty-which people visit to enjoy the wide open spaces and get away from the towns. By building more houses you are reducing the ONB of this area and therefore, to a certain extent discouraging the natural beauty of the area thereby impacting the reason that people come to this area to enjoy.</p>

	<p>We don't have strong enough infrastructure to support this amount of new homes. When village at full capacity in the summer (holiday homes used -10% of the houses in the village) the sewage drains struggle to cope and often overflow.</p> <p>The local village school is full to capacity with a waiting list so can't be counted as a facility for any new children in the village if houses are built.</p> <p>The surgery at Blakeney is closing and the nearest surgery is Holt and the bus service isn't good enough to rely on to get to appointments freely.</p> <p>No village shop - the last development was done in Langham by Avada promised to install one but this never happened-so people without cars would need deliveries which equals more traffic through the village.</p> <p>The labour government said that they are not going to impinge on green belt whilst delivering their promise for 1.5million new homes in the country- contradictory.</p> <p>Where there has previously been a proposal in the centre of the village (for 35 new homes) there are no natural access points that could be considered safe for use and also there are blind junctions that contain an arterial route through the village which sometimes have over sized lorries coming through. We have recently had significant damage to both personal buildings and to the overhead cabling at the point where an entrance was being proposed.</p> <p>In a meeting at the village hall concerning the proposed development, the majority of people present were against the development on a number of issues, it was felt that 35 homes was too many in such a small space. There is also a very old and large oak tree in the middle of the proposed land that we would hope wouldn't be removed. This area provides a beautiful natural break between the existing housing, which is very much a feature of the villages in North Norfolk, as is evidenced by many of the villages around such as Binham.</p> <p>This plan hasn't been submitted to the council as yet.</p> <p>One of our main concerns with regard to Langham is if Langham becomes a growth village and 15 homes are built at this stage, where does it stop?</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	<p>Concerns: relating to the proposed designation of Langham as a SGV. Langham has a AONB designation. By building more houses you are reducing and, discouraging to an extent, the natural beauty of the area and impacting the reason that people come to enjoy it. There are a number of infrastructure concerns, in relation to the sewerage system not coping in the summer, the village school is at full capacity, poor accessibility to doctors surgery and no village shop. Commentary regarding a proposed housing scheme for 35 dwellings, with concerns about safe access, an existing mature tree on site, and the loss of green space within the village. Poses the question about where the amount/ level of development will stop.</p>
Officer Response	<p>Disagree: Langham has been assessed against the revised methodology and meets the criteria to be identified as a SGV, with an indicative housing allowance of 15 dwellings. The assessment acknowledges the moderate environmental constraints associated with the village, including that the northern part of the village sits within the Norfolk Coast National Landscape (AONB) and that the southern part is adjacent to the designation, but this, in combination would not prevent the opportunity for small scale development within the village. The comments regarding infrastructure are noted but are unevidenced. Such matters would be assessed in detail at the planning application stage alongside all other material considerations.</p>
Section	Proposed Change 13 - Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages
ID	FC415
Response Date	19/12/2024 06:53:00
Consultee Full Name	Robert Barber
Consultee Organisation	Halsbury Homes

Agent Full Name	Robert Barber
Agent Organisation	Pegasus Group
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILES</p> <ol style="list-style-type: none"> 1 These representations to North Norfolk District Council's ('the Council') consultation on Proposed Changes to the submitted North Norfolk Local Plan ('the emerging Local Plan') are made by Pegasus Group on behalf of Halsbury Homes Ltd. 2 The Inspectors letter to the Local Plan Examination dated 24 May 2024 sets out clear concerns about the soundness of the emerging Local Plan. Halsbury Homes considers that the Council's Proposed Changes are effective in addressing those concerns, specifically in relation to Small Growth Villages. It is noted and understood that the emerging Local Plan is being examined under the September 2023 version of the NPPF. However, it is pertinent that the letter was drafted before the new NPPF 2024 (and accompanying changes to the NPPG) were published as there are additional implications to housing land supply that need to be considered as discussed in these representations. 3 As requested, these representations relate solely to the additional evidence on Proposed Changes that has been produced by the Council. Separate representations will be made as relevant on the Main Modifications that will be needed to address remaining issues of soundness, as already raised by the Inspector and at 1.3.3 of the consultation paper. 4 Halsbury Homes supports the continued inclusion of Catfield as a 'Small Growth Village'. This reflects the function of Catfield as a sustainable service village, which provides a level of services and facilities that is capable of supporting some of the day to day needs of both existing and new homes. This is evidenced by the Background Paper 2: Distribution of Growth as updated May 2023. Catfield is also within easy travel distance of Stalham which provides additional facilities. 5 The proposed increase of the 'Indicative Housing Allowance' for Catfield from 6% (approximately 27 homes) to at least 9% (approximately 39 homes) is also supported. Not only will this additional growth in Catfield (and other Small Growth Villages) help to make an important contribution towards the shortfall in housing against objectively identified need as identified by the Inspector, it is a level of growth that remains appropriate and proportionate to the sustainability of Catfield. Additionally, this level of housing growth will have positive benefits for the long term vitality and viability of the village, in line with paragraph 79 of the NPPF September 2023. This will be in respect of increasing spend and investment in smaller villages, while also ensuring that a range of new homes including affordable continues to be provided for those wanting to reside in the village. 6 The table at 3.0.12 confirms that the proposed Indicative Housing Allowance of 9% would equate to 39 new homes for Catfield. Footnote 2 suggests that this figure has been calculated as a percentage of the existing housing stock as detailed in available census data. This does not appear to be included in or linked to within the Local Plan Evidence Base. This is an important piece of data that needs to be included in the evidence base to ensure there is clarity and certainty on the number of homes that will / can be delivered in the Small Growth Villages. 7 This data is also important because footnote 1 confirms that the percentage allowance excludes homes built as Rural Exceptions Affordable Homes or as Community-Led Development. An element of flexibility in Policy SS 1 is therefore crucial to allow for changes in housing stock which may increase the Indicative Housing Allowances of 9% beyond the number of homes identified by the Council in the table at 3.0.12. Halsbury Homes agree with the Inspector's recommendation at paragraph 40 bullet point 1 of his letter dated 24 May 2024, and it is assumed that the relevant amends to the wording of Policy SS 1 to ensure sufficient flexibility will be picked up at the Main Modifications stage, alongside amends to criterion f (as re-iterated in the Council's letter to the Inspector dated 16 August 2024). 8 The Council indicates in its Proposed Changes consultation paper that the amends to the Small Growth Villages plus new and amended Site Allocations will result in approximately 1,271 additional new homes to come forward over the Plan period. It is for the Council to satisfy the Inspector that this number is realistic, achievable and deliverable – in terms of addressing the identified shortfall of about 1,000 dwellings across the Plan period. 9 In addition, there was an identified shortfall in the housing land supply for the five-year period 2025-30 of at least 32 homes plus any shortfall from 2024/25. This was the position as of May 2024, with a 5% buffer applied. The position changed on 12 December 2024. The revised NPPG (Paragraph: 013 Reference ID: 68-023-20241212) re-iterates that the relevant buffer is 20% for authorities where housing delivery has fallen below 85% of the requirement as set out in the latest Housing Delivery Test result. North Norfolk achieved a measurement of 82% in the HDT 2023 and therefore must apply a 20% buffer when calculating its five year housing land supply. An updated housing land supply position has not been published yet, but it seems likely that the Council will need

to make further amends to its growth strategy to identify additional sources of deliver to ensure there is no shortfall in its five year housing land supply upon adoption of the Local Plan.

- 0 The Council has not identified specific sites for allocation in Small Growth Villages, but through its Housing and Economic Land Availability Assessment (HELAA) has identified a number of suitable sites for windfall development. Land to the South of Church Road, Catfield (HELAA reference H0798, **Appendix 1**) is one such site which is promoted by Halsbury Homes. The HELAA provides a positive assessment of the site, confirming it is suitable and available for development, with no identified constraints and an indicative capacity of 85 homes. The capacity of the site is subject to detailed design, but the involvement of Halsbury Homes – an experienced local housebuilder – in the promotion of the site provides additional certainty of deliverability. Halsbury Homes is committed to early delivery of the site in the first five years of the Plan period, which will be bolstered by the site’s ability to drain to the Ludham-Walton Hall Wastewater Treatment Works which does not drain into a catchment affected by nutrient neutrality according to the Wensum and Broads Nutrient Neutrality Catchment Map (see extract at **Appendix 2**). A requirement to demonstrate nutrient neutrality will therefore not hold up delivery of this site, unlike many others across North Norfolk.
- 1 The site is able to deliver at least the approximately 39 homes that has been identified as Catfield’s Small Growth Village Indicative Housing Allowance – making an important contribution towards local need in the short term which is needed given the Authority’s recent housing delivery difficulties. As has been raised above, there is a requirement for the Council to identify additional housing delivery in the first five years of the Plan period if it is to comply with the NPPG requirement of a 20% housing land supply buffer.
- 2 Halsbury Homes can assist in this regard as well, as it has control over a larger parcel of land than shown in the HELAA mapping, as illustrated by the plan enclosed at **Appendix 3**. The HELAA assessment can be applied to this larger parcel as well, as it is similarly unconstrained and is suitable for the delivery of additional homes. While this would be an increase beyond the Indicative Housing Allowance identified by the Council of 9%, it is considered that this kind of increase on suitable sites within smaller villages is needed if the additional homes required for the 20% buffer are to be achieved. This is especially the case as this will need to be achievable within the first five years of the Plan period, requiring greater reliance on smaller sites which are deliverable quickly and will not be held up by enabling infrastructure requirements – as larger site allocations will be.
- 3 Lastly, the Council does need to be cognisant of the transitional arrangements set out in the new NPPF 2024. The emerging Local Plan’s current housing requirement of 557 dwellings per annum is less than 80% of the new standard method figure of 932 dwellings per annum (a difference of 357 dwellings per annum, with no buffers applied). The transitional arrangements set out in paragraph 236 of the NPPF 2024 will therefore apply, which will require the Council to commence preparation of a new Local Plan under the new plan making system – expected in 2025. This will effectively mean an immediate Local Plan Review upon adoption of the current emerging Local Plan, which will need to plan for a substantially increased local housing need when compared to the current housing requirement that is proposed. This further emphasises the importance of ensuring an effective and deliverable housing land supply is planned for now, to ensure limited issues during the Local Plan Review.
- 4 Halsbury Homes is keen to work collaboratively with the Council in confirming the deliverability of the site, and to ensure a positive policy position for the site is taken forward to deliver tangible benefits for local communities and the District as a whole, and allow a sound Local Plan to be taken forward to adoption. There are clearly suitable and sustainable site opportunities available which could make a valuable contribution towards housing need, such as the identified site at Catfield. Accordingly, the allocation of the site for residential development within the emerging Local Plan would be fully supported.

Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	Halsbury Homes has made comments on the Proposed Changes that have implications for the soundness of the Plan, and which require discussion in a public forum with the Planning Inspector to ensure appropriate modifications are made.
Include files	Appendix 1 - HELAA H0798.pdf (2) Appendix 2 - Site Location Plan.pdf (1) WwTW Catchment.png

Officer Summary	<p>Support: supports the proposed increase of the 'Indicative Housing Allowance' for Catfield from 6% (approximately 27 homes) to at least 9% (approximately 39 homes) although the information detailing the calculation should be available. It is a level of growth that remains appropriate and proportionate to the sustainability of Catfield which will also have positive benefits for the long term vitality and viability of the village, in line with paragraph 79 of the NPPF September 2023.</p> <p>General comments: reference made to the implications of the recent changes to the NPPF (December 2024) and comments about other main modifications in regard to amendments, for example to Policy SS1 including reference to the exclusion of other types of windfall development.</p> <p>Identification of site at Land to the South of Church Road, Catfield (HELAA reference H0798, Appendix 1) by Halsbury Homes. The HELAA provides a positive assessment of the site, confirming it is suitable and available for development, with no identified constraints. The site is able to at least deliver the 39 homes that has been identified as Catfield's SGV Indicative Housing Allowance with the potential for a higher level of growth given that Halsbury Homes has ownership of larger parcel of land. It is contended that the site can be delivered within the first five years of the plan period, particularly as it would not be held up by nutrient neutrality constraints.</p> <p>Accordingly, the allocation of the site for residential development within the emerging Local Plan would be fully supported.</p>
Officer Response	Support noted. As set out in Policy SS1 and the associated Table 2 of the Submitted Local Plan, SGVs do not have site allocations, but instead have an indicative housing allowance where a site can come forward provided a planning application satisfies the requirements of criteria 3 of the policy.
Section	Proposed Change 13 - Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages
ID	FC428
Response Date	18/12/2024 14:42:00
Consultee Full Name	Lynne Nash
Consultee Organisation	Clerk Sutton Parish Council
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Sutton Parish Council wish to respond to Subject Matters 1 & 2.</p> <p>Sutton Parish Council took the opportunity to discuss with residents the Local Plan Consultation document.</p> <p>Sutton is a peaceful rural village enjoyed by its residents. Residents manage the absence of what many would class as local amenities. Residents have no desire to seek change or be offered the opportunity to grow its Village setting.</p> <p>The current housing apportionment of 30 houses was made with no suitable available land to develop that is not in a high-risk flood zone. The current local infrastructure is failing and evidenced by Anglian Water, The Water Management Alliance and Highways. To propose raising this figure by 50% to 46 appears to make no sense and within the current economic environment and the lack of funding impossible to achieve.</p> <p>The community live with the consequences of insufficient /outdated infrastructures. Several properties are suffering actual and reoccurring damage from both water and sewerage invasion. The agencies involved acknowledge the problem and are working to resolve the existing problems.</p> <p>Norfolk Strategic Flooding Alliance was set up to bring all the agencies together to ensure Norfolk residents have the lowest flood risks. It has identified the need to change the planning system and Legislation. This current consultation does not address the work that has already been done.</p> <p>The Parish council have been advised by an NNDC road safety review that the money is not available to implement a suitable and safe traffic management system.</p> <p>It is therefore of no surprise the consultation document brings unrest to the community and makes residents feel their needs and concerns are not being considered or addressed.</p>
Do you consider it necessary to participate in a public hearing	

session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	Object: The current housing apportionment of 30 houses was made with no suitable available land to develop that is not in a high-risk flood zone. The current local infrastructure is failing and evidenced by Anglian Water, The Water Management Alliance and Highways. To propose raising this figure by 50% to 46 appears to make no sense and within the current economic environment and the lack of funding impossible to achieve. The community live with the consequences of insufficient /outdated infrastructures. Several properties are suffering recurring damage from water and sewerage invasion. The agencies involved acknowledge the problem and are working to resolve the existing problems. Reference to the Norfolk Strategic Flooding Alliance and that the consultation does not address the work that has been done.
Officer Response	Disagree: The proposed increase to 9% growth to SGVs provides an indicative housing allowance of 46 dwellings for Sutton over the lifetime of the plan. Whilst infrastructure matters are acknowledged, they are not considered to prevent the overall opportunity for small scale development, where any site specific infrastructure matters will be addressed at the planning application stage.
Section	Proposed Change 13 - Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages
ID	FC483
Response Date	19/12/2024 09:26:00
Consultee Full Name	Mr James Alflatt
Consultee Organisation	Partner Bidwells
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILES</p> <p>This representation has been prepared by Bidwells LLP on behalf of Clive Hay Smith of Priory Holdings Limited in respect of their landholding at land off Pine Walk Weybourne, responding to the Inspectors concerns around the Council's Spatial Strategy. Specifically, the options to broaden the 'Small Growth Villages' tier within the settlement hierarchy to allow for additional growth and opportunity for villages within the District to grow and thrive. This is aligned with the requirement for additional dwellings to be identified to both respond positively to an adjusted and extended plan period of 2024-2040 and to address an identified housing shortfall.</p> <p>This representation references doc FC001 (a) Further Consultation (to address the Planning Inspector's Interim Findings) and Supporting Documents ref FC003 Distribution of Growth (Small Growth Villages) Addendum and ref FC004 Settlement Boundary Review (Small Growth Villages) Addendum.</p> <p>Positively Prepared & Justified</p> <p>We contend that the Council's approach to increase the allocation of additional housing to the Small Growth Villages tier of the hierarchy is welcomed. We note doc FC001(a) Proposed Change 13 is to increase the level of proposed housing growth from 6 to 9% in all Small Growth Villages. However, with reference to Table 2 Small Growth Villages Housing Apportionment, for Weybourne, the submitted plan had an indicative housing allowance at 6% of 21 dwellings, but in this consultation, the proposed indicative housing allowance at 9% has fallen to 20 dwellings. So, whilst the Council is claiming an increase from 6-9% in all Small Growth Villages, Weybourne has seen a reduction. We consider the increase for Weybourne should be 32 dwellings and not 20 as proposed by this change.</p> <p>Effective</p> <p>Furthermore, the Council's reliance upon the availability of sites within these settlements (Small Growth Villages) is based in principle on the Council's Housing & Economic Land Availability Assessment (2017), which by their own submissions represents a 'snapshot of capacity based upon the data and information available as at 1 August 2016' (NNDC –</p>

Addendum to Background Paper 2L Distribution of Growth (Small Growth Villages) November 2024) (Examination Doc FC003). We therefore consider that the evidence upon which the availability, suitability and deliverability of sites within these Small Growth Villages has been assessed is out of date leading to questions around the effectiveness of this policy approach.

Consequently, we do not consider the Council has sufficiently addressed the Inspector's concerns around their restrictive approach taken to the allocation of dwellings to these Small Growth Villages.

With the increased reliance on the 'Small Growth Villages' tier of the settlement hierarchy playing their part in the housing delivery of North Norfolk, in order to pass the tests of soundness (effective & justified), the Council needs to be certain that there are sufficient sites within or adjacent to these designated small growth villages that are suitable, available and deliverable/viable to deliver the quantum of development identified.

We would contend that settlements such as Weybourne are already constrained within their existing development boundary, and furthermore, limited appropriate locations available immediately adjacent to the settlement. For this reason, Priory Holdings considers that the Council should identify sites to accommodate the growth within the Small Growth Villages and propose to identify them as allocations, rather than the current proposal of *'first application approach to capacity'* whereby applications will be considered on their merits up to the proposed capacity required being met. This approach does not result in good place making or awareness of what is available in the locality of the designated Small Growth Village. Such an approach also does not determine the contribution such sites could have to the long-term sustainability of the settlement, consistent with national policy.

Land off Pine Walk, Weybourne was submitted on behalf of Mr Clive Hay Smith of Priory Holdings Ltd to the Council's Call for Sites process in 2019 and is identified through the Council's Housing and Land Availability Assessment 2017, confirming that the Council considers this site to be suitable and available for residential development.

For this purpose, we enclose a feasibility layout (Appendix 1) to demonstrate how the proposed quantum of 20 residential dwellings to the Small Growth Village of Weybourne could be accommodated. The enclosed scheme delivers an emerging policy compliant mix of accommodation, with open space which is in excess of emerging policy requirements, and a biodiversity net gain of at least 10%. The scheme as proposed also offers the following benefits:

- Delivery of policy compliant affordable housing:
- Mix of private market accommodation, including 20% of the dwellings identified as self-build units (not required by policy on such small sites, but a significant benefit to deliver a mix of dwelling types and meet the housing requirements of the village.
- Two points of existing vehicular access to the site are in place. The first access point is off Station Road, and constitutes a grass farm track, which would be upgraded with any proposals to provide a pedestrian/cycle connection direct into the village. The second point of vehicular access is obtained via the existing Pine Walk adopted highway which adjoins the site boundary (see Appendix 2 -Transport Note).
- There is no evidence to suggest that the site is contaminated or there are any unsuitable ground conditions. The site, in its entirety, falls within Flood Zone 1. There is, therefore, a low probability of flooding on the site.
- The site holds limited ecological value, due to its existing arable farming on the site. Preliminary ecological input advises that the proposals as illustrated in Appendix 1 could achieve at least a 10% biodiversity net gain.
- Development of residential dwellings on the site is highly compatible with the existing residential dwellings which border the site to the south and west. These dwellings are detached bungalows, situated on Pine Walk. Further to this, the site is bordered to the north, by dispersed hedgerows and trees, with open farmland beyond. The site, therefore, offers a logical extension to the existing settlement.

The site is considered to be entirely deliverable, and capable of making a contribution towards satisfying the Councils' housing needs during the period to 2040.

- The site falls within a sustainable location, with Weybourne benefiting from a public house (The Ship). tea room, village shop and recently opened (June 2024) hotel/restaurant (The Maltings), alongside close proximity to Kelling Primary School (approximately 1.6 miles from the site). Weybourne also benefits from multiple bus stops, providing direct bus connections with Cromer, Sheringham, Holt, Wells-next-the-Sea, Kelling, and Fakenham. Further to this, the site is within close proximity to Sheringham (approximately 3 miles), which provides a range of services and amenities, including a range of retail and employment opportunities, a train station, High School and Leisure Centre

	<p>Through development of this site for residential development, as part of any planning permission granted or policy allocation proposed, Priory Holdings Limited would commit to a financial contribution sufficient to support the construction of a new village hall which is in the early stages of planning by the community.</p> <p>Further land is available within the control of Priory Holdings Limited with the ability to achieve a safe and acceptable further point of vehicular access to the site to increase the number of dwellings beyond the 20 dwellings currently identified. If our earlier observations on numbers are confirmed, the wider landholding would be capable of delivering at least the 32 dwellings that should be identified by increasing the allocation of housing to each Small Growth Village from 6%-9%.</p> <p>In summary, Weybourne, as a Small Growth Village is identified as a suitable and sustainable location which can accommodate additional development which is supported by Priory Holdings limited. However, to have certainty that these Small Growth Villages will deliver the required housing in the most appropriate and logical locations and where they can contribute significant community benefits both in terms of housing delivery but also investment in community infrastructure, it is important land is identified and allocated through the plan making process to ensure the policy approach meets the 'positively prepared' and 'effective' tests of soundness.</p> <p>Land at Pine Walk, Weybourne meets the three pillars of delivering sustainable development, consistent with national policy in the following ways:</p> <p>Economically, the site represents the right land in the right place at the right time. Residential development on the site would help to support and sustain the local economy in Weybourne. As well as providing jobs during construction, the development would provide high-quality and desirable homes within easy reach of key employment areas, notably Sheringham.</p> <p>Socially, development on the site is such that it will enable the creation of a strong, vibrant and healthy community, which occupies a sustainable location. A mixture of dwelling types, sizes and tenures will be provided, informed by local housing need, and S106 contributions will help to provide and enhance the local community facilities on offer in Weybourne, and the surrounding areas. The provision of residential dwellings on the site will, therefore, help to meet the future housing needs of Weybourne.</p> <p>Environmentally, the site benefits from access to existing modes of sustainable transport, including bus services, providing direct connections to Cromer, Sheringham, Holt, Wells-next-the-Sea, Kelling, and Fakenham.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	<p>Yes</p>
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	<p>Priory Holdings Limited and Bidwells LLP (as their planning advisors) reserve the right to participate in the hearing session(s) to seek to ensure that the issues raised are fully addressed, and the Proposed Change can be made sound.</p>
<p>Include files</p>	<p>Appendix 1 - Feasibility Site Layout.pdf Appendix 2 - Highway Access and Design Statement - Dec 2024.pdf</p>
<p>Officer Summary</p>	<p>Support (partial)/ Object (partial)/ General comments: welcomes the Council's approach to increase the allocation of additional housing to the Small Growth Villages tier of the hierarchy, but considers the increase for Weybourne's indicative housing allowance should be 32 dwellings and not 20 as proposed in Table 2 Small Growth Villages Housing Apportionment.</p> <p>Considers that the evidence upon which the availability, suitability and deliverability of sites within SGVs has been assessed, HELAA (2017) is out of date leading to questions around the effectiveness of this policy approach. Settlements such as Weybourne are already constrained within their existing development boundary, and furthermore, limited appropriate locations available immediately adjacent to the settlement. As such, the Council should allocate sites to accommodate the growth within the SGVs in order to pass the tests of soundness (effective & justified), to provide certainty that there are sufficient sites within or adjacent to these designated SGVs that are suitable, available and deliverable/viable.</p> <p>Details provided of site Land at Pine Walk, Weybourne, including Feasibility Site Layout and Highway Access and Design Statement showing how 20 dwellings could be accommodated, which would meet the three strands of sustainable development, in terms of economic, social and environmental matters. Notes that further land is available within the same landowners control.</p>
<p>Officer Response</p>	<p>Support noted for Proposed Change 13, to increase the percentage of growth from 6% to 9% for the SGVs.</p>

Disagree: As set out in the Distribution of Background Paper 2 in section 6 and at Tables 9 and 10, the indicative housing allowance figures have been adjusted in the intervening period firstly to correct the 2011 census population data for Weybourne (Table 9) and then, post regulation 19, the population data was updated to use 2016 estimated population projections bringing them in line with the setting of the overall housing target. As such, the indicative housing allowance is correctly calculated, being 20 dwellings at approximately 9% growth.

The proposed changes 12 and 13 are in direct response to the Planning Inspector's comments regarding the approach to Small Growth Villages in his Initial Findings letter [Examination ref.EH006(f)]. For Weybourne, the local plan seeks at least 35% affordable housing on all developments of 6 or more dwellings.

For information, the proposed site on Land at Pine Walk would appear to be immediately adjacent to the settlement boundary for Weybourne, as set out in the Settlement Boundary Review: Small Growth Villages Background Paper 11 [Examination ref. C11] and as such, would meet the locational criteria of Policy SS1 Spatial Strategy (3), being immediately adjacent to the settlement boundary.

Section	Proposed Change 13 - Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages
ID	FC486
Response Date	18/12/2024 19:22:00
Consultee Full Name	Cllrs Kevin & Matthew Bayes & Taylor
Consultee Organisation	Members for Stalham Ward (NNDC)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Below, we outline the concerns and perspectives of the communities of Sutton and Catfield, incorporating feedback from their respective parish and town councils.</p> <p>Sutton</p> <p>Sutton is a tranquil rural village with a strong sense of community, where residents value the village's current character and way of life. The community manages without many of the amenities typically associated with larger settlements and does not seek expansion or changes that would alter its essential rural nature. Key concerns include:</p> <ul style="list-style-type: none"> • Housing Allocation: The proposed increase in housing allocation from 30 to 46 dwellings is highly problematic. The availability of suitable land for development is limited due to extensive areas of high flood risk. • Infrastructure Limitations: Existing infrastructure is already inadequate, as evidenced by persistent issues with flooding and sewerage. Agencies such as Anglian Water and the Water Management Alliance have acknowledged these deficiencies and are working to resolve current problems. However, there is no additional capacity to accommodate further development. • Traffic and Road Safety: A review by NCC confirmed insufficient funding to deliver essential traffic management improvements. • Flooding Risks: While the Norfolk Strategic Flooding Alliance has made progress in addressing flood risks, it has highlighted the need for changes to planning systems and legislation. The consultation fails to adequately reflect these findings, leaving residents feeling their concerns are being overlooked. <p>We strongly recommend that no additional housing is allocated to Sutton until the current infrastructure deficiencies—particularly flooding and sewerage—are fully resolved.</p> <p>Catfield</p> <p>The proposed increase in Catfield's housing allocation from 27 to 39 dwellings raises significant concerns, particularly regarding environmental and infrastructure constraints:</p> <ul style="list-style-type: none"> • Environmental Constraints: Catfield is surrounded by nationally and internationally protected wetlands, including Catfield and Sutton Fens and Hickling Broad. Recent findings, such as the Environment Agency's Ant Broads and Marshes Restoring Sustainable Abstraction (ABM RSA) investigation and a successful Judicial Review, emphasise the critical importance of addressing hydrological issues in the area. Changes to abstraction licences have already led to rising groundwater levels, causing flooding and damage. • Flooding and Hydrology: The flooding experienced during winter 2022/23 highlights Catfield's vulnerability. Flooding impacted properties, public infrastructure, and even the primary school, which was forced to close due to sewage system failures. Current

flood modelling must be updated to account for these developments and accurately assess future risks.

- **Housing Allocation and Proportionality:** Catfield's designation as a Small Growth Village should guide its housing allocation. The inclusion of the recently approved 21 dwellings at the former Milestones Hospital within the total allocation of 39 is essential to avoid disproportionate growth. Without this adjustment, the effective allocation would rise to 60 dwellings, which is excessive and unsustainable.

We also note that Catfield's designation as an employment growth area adds further development pressures, which must be carefully managed to preserve the village's character and ecological importance.

General Recommendations

- 1 **Infrastructure Improvements First:** Development should only proceed where infrastructure—including flood defences, sewerage systems, and highways—can demonstrably support additional demand.
- 2 **Environmental Sensitivity:** Environmental constraints must be central to decision-making, particularly in areas like Catfield with unique and protected ecological features. Local Plan policies must align with recent environmental studies and legal rulings.
- 3 **Community Involvement:** Residents' concerns and the input of parish and town councils should be prioritised in decision-making to ensure development meets local needs and respects community character.

We urge North Norfolk District Council to carefully consider these points and work collaboratively with our communities to address these concerns effectively.

Do you consider it necessary to participate in a public hearing session, should these be required?

If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:

Include files

Officer Summary

Concerns: Key concerns for Sutton and Catfield.

In relation to Sutton. 1) The proposed increase in housing allocation from 30 to 46 dwellings is problematic due to the limited availability of suitable land for development because of extensive areas being of high flood risk. 2) Existing infrastructure is already inadequate, as evidenced by persistent issues with flooding and sewerage. Agencies such as AW and the Water Management Alliance have acknowledged these deficiencies and are working to resolve current problems. However, there is no additional capacity to accommodate further development. 3) A review by Norfolk CC confirmed insufficient funding to deliver essential traffic management improvements. 4) While the Norfolk Strategic Flooding Alliance has made progress in addressing flood risks, it has highlighted the need for changes to planning systems and legislation. The consultation fails to adequately reflect these findings, leaving residents feeling their concerns are being overlooked.

Strongly recommend that no additional housing is allocated to Sutton until the current infrastructure deficiencies, particularly flooding and sewerage, are fully resolved.

In relation to Catfield. 1) Catfield is surrounded by nationally and internationally protected wetlands, including Catfield and Sutton Fens and Hickling Broad. Recent findings, such as the EA's Ant Broads and Marshes Restoring Sustainable Abstraction (ABM RSA) investigation and a successful Judicial Review, emphasise the importance of addressing hydrological issues in the area. Changes to abstraction licences have already led to rising groundwater levels, causing flooding and damage. 2) The flooding experienced during winter 2022/23 highlights Catfield's vulnerability. Flooding impacted properties, public infrastructure, and even the primary school. Current flood modelling must be updated to account for these developments and accurately assess future risks. 3) Catfield's designation as a SGV should guide its housing allocation. The inclusion of the recently approved 21 dwellings at the former Milestones Hospital within the total allocation of 39 is essential to avoid disproportionate growth. Without this adjustment, the effective allocation would rise to 60 dwellings, which is excessive and unsustainable.

Also note that Catfield's designation as an employment growth area adds further development pressures, which must be carefully managed to preserve the village's character and ecological importance.

General Comments. 1) Development should only proceed where infrastructure, including flood defences, sewerage systems, and highways, can demonstrably support additional demand. 2) Environmental constraints must be central to decision-making, particularly in

	<p>areas like Catfield with unique and protected ecological features. Local Plan policies must align with recent environmental studies and legal rulings. 3) Residents' concerns and the input of parish and town councils should be prioritised in decision-making to ensure development meets local needs and respects community character.</p> <p>NNDC are urged to carefully consider these points and work collaboratively with communities to address these concerns effectively.</p>
Officer Response	<p>Comments noted.</p> <p>Policy SS1 Spatial Strategy of the emerging Local Plan does not allocate sites for Small Growth Villages, but provides an indicative housing allowance and directs that such growth would need to meet the requirements of criteria 3 of Policy SS1. The SGV approach allows the opportunity for small scale proposals to come forward in Sutton or Catfield during the lifetime of the Plan, where matters such as drainage strategies would be required as part of a planning application.</p> <p>For information, Norfolk CC, as the LLFA, notes that the SGV assessments utilises the North Norfolk SFRA (2018) climate change flood risk layers in relation to fluvial, tidal and surface water flooding and confirms that any proposed growth will need to consider the environmental constraints associated with flood risk from all sources. This would be carried out at the planning application stage. In addition, Norfolk CC, as the Highway Authority, has reported no objection to the increase in the number of SGVs as listed under point 12 or the increase in growth from 6% to 9% in all SGVs as stated in point 13.</p> <p>For information, the Anglian Water consultation response reports Sutton as having available dry weather flow headroom to accommodate additional wastewater flows. In relation to Catfield, Anglian Water reports that there is not currently capacity to accommodate additional flows from proposed growth and no proposed growth scheme within AW's PR24 Business Plan for AMP8 (2025-30). The proposed growth would need to be phased for later in the plan period to align with future investment at the WRC's in subsequent AMPs. As such, the principle of the proposed growth is considered acceptable as the necessary capacity can be planned into subsequent AW Business Plans.</p> <p>With particular regard to Catfield, the Council acknowledges the environmental constraints to development in and around Catfield, and that the final depth of groundwater in the area remains unknown subject to further monitoring and modelling by the EA. However, it is considered that these constraints would not preclude development in Catfield as a SGV. It would be at the planning application stage that a proposal would need to demonstrate that there would be no impacts upon the underlying groundwaters. As such, impacts upon any relevant land would be considered on a case-by-case basis as and when individual applications are submitted, and would be based on the most up to date information available regarding groundwater levels at that point in time. On this basis, the Council is satisfied that, at the strategic level, the proposed growth of 39 dwellings over the plan period (2024-2040) could be accommodated without detrimentally impacting nearby designated sites.</p> <p>For information, the Broads Authority (BA) and Environment Agency (EA) have been consulted on the emerging Local Plan and Further Consultation proposals and have not raised any specific concerns about the proposed increase in the percentage of housing growth in Catfield. The operation of the Indicative Housing Allowance will be from the date of adoption of the Local Plan and as such, the existing planning permission cited would not be counted against the allowance. In addition, if a proposal for new dwellings is located within the settlement boundary it would be recorded as infill development and counted as windfall development - as directed by the Inspector through the previous hearing sessions. This approach to infill development applies to all of the SGVs.</p> <p>The operation of the Indicative Housing Allowance will be from the date of adoption of the Local Plan and as such, the existing planning permission cited would not be counted against the allowance. In addition, if a proposal for new dwellings is located within the settlement boundary it would be recorded as infill development and counted as windfall development - as directed by the Inspector through the previous hearing sessions. This approach to infill development applies to all of the SGVs.</p>
Section	Proposed Change 13 - Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages
ID	FC492
Response Date	18/12/2024 13:06:00
Consultee Full Name	
Consultee Organisation	Glavenhill Strategic Land
Agent Full Name	Mr Philip Atkinson
Agent Organisation	Director

	Lanpro Services
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>My client supports Proposed Change 13 entitled Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages to allow for new additional housing development growth and increases by some 9% of existing housing stock.</p> <p>My client does however object strongly to the reduction in the Badersfield (Scottow) allowance from 37 dwellings (at the previous 6% allowance rate) to 35 dwellings (at the new 9% allowance) under Proposed Change 13. There is no logic whatsoever to restricting new planned housing growth within the sustainable settlement of Badersfield (Scottow) to a level below all the other Small Growth Villages, when Badersfield (Scottow) contains the largest stand-alone employment centre in North Norfolk District Council area. It also contains the third largest concentration of employment space in the District behind the main towns of Fakenham and North Walsham. As such the settlement of Badersfield (Scottow) is the most highly sustainable Small Growth Village to accommodate new housing and employment growth in the District and the settlement should have an allowance that is at least the same (or more appropriately far greater) that the other villages listed under emerging Policy SS1.</p> <p>As such there are very clear and obvious opportunities to grow Badersfield (Scottow) and to provide future residents with the opportunity to live very close to where they work. This is a unique growth opportunity within North Norfolk District Council area and any new growth will in-turn will sustain, extend and grow (by delivering enhanced contraflow in the peaks) public transport services back to North Walsham and Worstead Rail Station for the benefit of all workers and residents on-site.</p> <p>It should also be noted that due to planned changes in educational provision there will also be available early years and Primary School pupil capacity within Badersfield (Scottow) at the time new homes are delivered and this clear growth opportunity has been ignored in the assessment to-date and the proposed Further Consultation changes.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	My client would respectfully request that we are able to attend the reconvened Examination in Public to discuss the matters raised in this representation in respect of Badersfield (Scottow).
Include files	
Officer Summary	<p>Support: support for Proposed Change 13 to amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages.</p> <p>Object: strongly opposed to the reduction in the Badersfield (Scottow) allowance from 37 dwellings (at the previous 6% allowance rate) to 35 dwellings (at the new 9% allowance) under Proposed Change 13, which would restrict planned housing growth in a highly sustainable location, where there are also significant employment opportunities.</p> <p>There are very clear and obvious opportunities to grow Badersfield (Scottow) and to provide future residents with the opportunity to live very close to where they work. Due to planned changes in educational provision there will also be available early years and Primary School pupil capacity within Badersfield (Scottow) at the time new homes are delivered and this clear growth opportunity has been ignored in the assessment to-date and the proposed Further Consultation changes.</p>
Officer Response	<p>Disagree: As set out in the Distribution of Background Paper 2 in section 6 and at Tables 9 and 10, the indicative housing allowance figures have been adjusted in the intervening period firstly to correct the 2011 census population data for Weybourne (Table 9) and then, post regulation 19, the population data was updated to use 2016 estimated population projections bringing them in line with the setting of the overall housing target. As set out in paragraph 6.7 of the Background Paper, the updated mid 2016 population estimate for Badersfield produces a comparatively high indicative housing allowance of approximately 47 dwellings (Regulation 19 version) based on 6% growth. Such an allowance would potentially give rise to the development of more new dwellings than the majority of the higher order Large Growth Villages, as the population in Badersfield is inflated by the former RAF base accommodation. In addition, the review of services and facilities has revealed that the identified school in Badersfield is the Douglas Bader School, which is an alternative provision academy for excluded students and children missing education (years 1 – 11) covering a wide catchment in Norfolk. Therefore, the school does not function as a normal catchment-based facility, and consequently, this facility has not been recorded as educational provision for the settlement. Given these further considerations, the 6% growth allowance was seen as disproportionately</p>

	<p>large for the level of services and facilities within the settlement and, consequently, it was reduced by 50%, to 3% growth, which provides an indicative housing allowance of 23 dwellings (Table 10).</p> <p>The circumstances and approach to Badersfield were discussed and agreed at the Hearing sessions (in January – March 2024) as modifications, which will be the subject of a further public consultation. The proposed changes to increase the indicative housing allowance has followed the same approach in providing an indicative housing allowance for Badersfield of half of the proposed 9% growth (approx.4.5%) for the same reasons as above.</p>
Section	Proposed Change 13 - Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages
ID	FC510
Response Date	18/12/2024 16:59:00
Consultee Full Name	
Consultee Organisation	Richborough Estates
Agent Full Name	Simon Atha
Agent Organisation	Associate Director Boyer on behalf of Richborough
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>To resolve matters of soundness in relation to the housing requirement, the Inspector suggested that the approach to the Small Growth Villages in Policy SS1 'Spatial Strategy' could be broadened to support additional growth where Small Growth Villages have at least one Key Service and three Secondary or Desirable Services.</p> <p>The Council's proposals to address the main areas of concern include identifying 10 new Small Growth Villages. These are as follows:</p> <ul style="list-style-type: none"> - Beeston Regis - Erpingham - Felmingham - Great Ryburgh - Itteringham - Langham - Northrepps - Stibbard - Tunstead - Worstead <p>The Council seek to provide an indicative housing allowance proportionate to the existing settlement and size to allow development to come forward over the plan period on a windfall basis where they are adjacent to the defined settlement boundary.</p> <p>Proposed Change 13 as part of the consultation document seeks to amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages. In total, this approach allows for approximately 873 new dwellings across all Small Growth Villages during the plan period 2024-40.</p> <p>Richborough are supportive of this proposed amendment as it will assist in ensuring that the Council can deliver its identified housing requirement in full. The proposal assists in ensuring that appropriate levels of growth are distributed in the most sustainable and suitable locations across the district as a whole. Additional growth in these villages will assist in supporting the use and retention of identified Key Services and Secondary or Desirable services.</p> <p>Given the district has a good track record of windfall delivery from small sites in village locations, it is reasonable to assume based on the Council's identified anticipated windfall rate that such delivery will continue and landowners provided with more certainty to bring forward further land within Small Growth Villages for development over the plan period.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please	

outline why you consider this to be necessary:	
Include files	
Officer Summary	Support: supportive of Proposed Change 13, to increase the percentage growth for the SGVs to 9%, as the proposal assists in supporting appropriate levels of growth across the district as a whole and more specifically, will assist in supporting the retention of services and facilities within these villages. The district has a good track record of windfall delivery from small sites and it is considered that such delivery will continue affording more certainty to landowners of bringing forward land within SGVs over the plan period.
Officer Response	Support noted.
Section	Proposed Change 13 - Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages
ID	FC513
Response Date	18/12/2024 10:57:00
Consultee Full Name	
Consultee Organisation	The Delahunty Family
Agent Full Name	James Ellis
Agent Organisation	Rural Solutions
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILE
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	Land at Sculthorpe, Further Consultation Response - 18.12.24.pdf
Officer Summary	Support: supports the approach of the council to accommodate additional opportunities for growth in SGVs, including Sculthorpe. Promotion of site in Sculthorpe on Land off Creake Road, where detailed pre-application was sought (DE21/23/2521) and received a positive response for 20 dwellings, based on the adopted rather than the emerging plan. Given the favourable nature of pre-application advice received, it is considered that the site could be allocated in the final Plan, assisting with meeting the strategic plan objectives of supporting growth in smaller villages. Supports the increase to the indicative housing allowance to 9% growth. There are other land opportunities for housing development within Sculthorpe in the family ownership, with clear opportunities for affordable housing. Requests that the proposed site for approx., 20 dwellings is allocated and in addition to the 9% housing allowance. If not allocated, then a greater allowance is allowed to reflect opportunities for development.
Officer Response	Support noted. As set out in Policy SS1 of the Submitted Local Plan, SGVs do not have site allocations, but instead have an indicative housing allowance where a site can come forward provided a planning application satisfies the requirements of criteria 3 of the policy. For information, the defined settlement boundary for Sculthorpe can be viewed within the Settlement Boundary Review (SGVs) Background Paper 11 [Examination ref. C11]. It will be through the submission of a planning application that any site specific constraints would be considered as part of the assessment process. Additional sites for affordable housing can come forward at any time in line with Policy HOU3 Affordable Homes in the Countryside (Rural Exceptions Housing).
Section	Proposed Change 13 - Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages
ID	FC518

Response Date	20/12/2024 11:41:00
Consultee Full Name	Ms Elaine Pugh
Consultee Organisation	Clerk Southrepps Parish Council
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILE
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	SOUTHREPPS-LOCAL PLAN 2024.pdf
Officer Summary	<p>Object: Southrepps PC objects to Southrepps being designated as a Small Growth Village, the reasons for which have been stated to the Local Planning Authority on numerous occasions. Grave concerns that there is no longer a settlement boundary, which is inappropriate in a village where the majority of it is within a conservation area and all of it is within the North Norfolk AONB. These constraints should override any designations for proposed development. Southrepps is two separate village settlements, Upper Street and Lower Street, separated by a mile of countryside. Therefore, these settlements should be treated separately. Southrepps has seen significant development over the past few years. Details provided of two schemes accounting for 34 new dwellings and reference to continuous development at Beechlands.</p> <p>At the last census the population of Upper Street was about 500 and Lower Street around 300. Using NNDC's figures of 2.04 people per household this would mean there are about 245 houses in Upper Southrepps and 147 in Lower.</p> <p>The PC is disputing the need to increase the Southrepps allocation from 6% to 9%. This increase is substantial for a SGV and we are the smallest of those specified. Southrepps has already been subscribed too many new homes within the villages. 6% applied housing allocation would mean 14-15 additional houses in Upper Southrepps and 8-9 in Lower Southrepps. A 9% increase equates to a further additional 30 homes during the plan period of 15 years.</p> <p>We request confirmation that these are the figures NNDC are using specifically with regard to the number of houses in both locations. For example, that the 9% growth would be fairly and equally distributed between Upper Street and Lower Street. In view of the recent planning permissions granted in Upper Street Southrepps (scheme in Long Lane) we believe that these figures are more than is required for Southrepps and that the overall target of 9% is reduced. We seek confirmation that once any limits agreed have been reached there will be NO further planning permissions granted during the plan period to 2036.</p> <p>More generally, the PC is concerned that the very significant growth planned to the west of North Walsham will have a significant impact on the surrounding smaller villages and rural road network and that due consideration to this adverse impact has not been given.</p> <p>Comment on spatial strategy: the Plan states that each selected settlement has a defined settlement boundary. Where are the settlement boundaries? 6% growth for the Small Growth Villages is still unacceptable as is the now proposed 9%. The delivery of Affordable homes is a key priority of this Plan. In view of the time taken by the developer of the houses in Church Street to develop, should Planning Application 09/0121 be turned over to a housing provider?</p> <p>Comment on number of new homes: The methodology which the NNDC planning team has used is clearly flawed and contradictory and needs further clarification. When using the figures supplied by NNDC for the overall number of new homes required, the number has been inflated by nearly 50% and that by applying NNDC's criteria and forecasts only 4,160-5,400 houses would be required rather than the 9,600 homes stated. PC analysis provided on population and dwelling numbers within the supporting text of the submission version of the Local Plan [Examination ref. A1] – see attached document for full details.</p> <p>Comment on coastal change: the Local Plan states that Local Plans should make provision for infrastructure that needs to be relocated due to erosion of the coast. The coast road in the Parish of Trimingham is under severe threat. What are NNDC and NCC's plan to deal</p>

	<p>with this? There does not appear to be any provision for this. Appendix 5 of the Plan shows the areas under threat.</p> <p>Comment on transport: details stated from 4 paragraphs of the supporting text of the Local Plan referring to statistics regarding low income households, reliance on private car, including to travel to work. Questions how income households will be able to afford electric cars in the future to get to work and commenting on the need for better public transport provision.</p> <p>The large scale developments proposed for Fakenham, Cromer and North Walsham will have a great impact on their surrounding areas and the 'ripples' of these developments will be felt far and wide. Where are these effects considered?</p> <p>Issues exiting Southrepps to Norwich via Coltishall is currently very difficult without the new homes proposed coming on stream. Vehicles accessing the beaches via small roads and bridges such as Swafield, Knapton, Trunch and Southrepps will become even more chaotic and gridlocked in some parts.</p> <p>The PC is keen to work with NNDC Planning Department to ensure that the Conservation Area and provision within the AONB is considered more fairly and balanced over the forthcoming years.</p>
Officer Response	<p>Comments noted. The designation of Southrepps as a SGV is not part of the Further Consultation, having already been examined in the earlier hearing sessions in 2024. The Inspector has determined that growth in such villages, which provide local services, is necessary in order to help support the vitality of rural communities, in accordance with the NPPF (paragraph 79).</p> <p>The defined settlement boundary for all the small growth villages, including Southrepps, is detailed on the Policies Map [Examination ref. A2] and in the Settlement Boundary Review: Small Growth Villages Background Paper 11 [Examination ref. C11]. The calculation for the Indicative Housing Allowances is explained in Chapter 6 of Background Paper 2 Distribution of Growth [Examination ref. C2], being a percentage increase in dwellings, where the number of existing dwellings was derived by dividing the number of residents in each village (using mid 2016 estimated population projections) by an average household size of 2.3 people.</p> <p>There are checks and balances within Policy SS1 to ensure appropriate sustainable development is achieved. The requirements at criterion 3 for Small Growth Village development include 3(c) that, the proposal is small scale, incremental growth compatible with the form and character of the village and its landscape setting in terms of siting, scale, design, impact on heritage assets and historic character. In addition, any proposal would need to satisfy the requirements of other policies in the Local Plan, for example, Policies ENV8 High Quality of Design.</p> <p>For information, the operation of the Indicative Housing Allowance is from the date of adoption of the Local Plan. In addition, if a proposal for new dwellings is located within the settlement boundary it will be recorded as infill development and counted as windfall development, as directed by the Inspector through the previous hearing sessions in 2024. This approach to infill development applies to all the SGVs.</p> <p>The majority of the wider comments of the PC relate to matters and policy approaches that are set out in the Local Plan and which have already been examined and are not part of this consultation.</p> <p>For information, The Plan is being examined under transitional arrangements following the publishing of a revised NPPF. local housing need is assessed by using a standard methodology (at the time of submission) as set out in the national Planning Practice Guidance Housing and economic needs assessment - GOV.UK. The Inspector, in his Interim Findings Letter of May 2024 [Examination ref. EH006(f)] confirms the local housing need figure in paragraph 12, as being 557 dwellings per annum, which gives a total of 8,900 dwellings during the revised plan period of 2024 – 2040.</p>
Section	Proposed Change 13 - Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages
ID	FC519
Response Date	19/12/2024 11:06:00
Consultee Full Name	Tessa Saunders
Consultee Organisation	Spatial & Strategic Planning Manager Anglian Water
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILE

Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	Anglian Water Response (Small Growth Villages) 19.12.24.pdf
Officer Summary	<p>Anglian Water is concerned that additional SGVs have been identified for proposed growth by applying a percentage increase, without undertaking the necessary steps in terms of infrastructure capacity, particularly for accommodating wastewater flows from proposed development. The approach taken means that the numbers for all the Small Growth Villages (excluding those identified as 'constrained') has increased. Anglian Water understands that there are many elements to evaluating a settlement hierarchy and spatial strategy for future growth, in terms of water supply and specifically water recycling infrastructure, we support a methodology that places a quantitative approach to assessing growth options i.e. utilising available capacity at our WRCs to accommodate future growth at locations informed by a Water Cycle Study or Integrated Water Management Study (IWMS). This approach applies the sustainability hierarchy to utilise existing infrastructure capacity to reduce the operational and embodied carbon emissions from building new infrastructure to support growth. Detailed comments provided for each SGV, where:</p> <p>The 20 settlements of Bacton, Corpusty & Saxthorpe, East & West Runton, Beeston Regis, Great Ryburgh, Happisburgh, High Kelling, Little Snoring, Little Walsingham, Northrepps, Overstrand, Sculthorpe, Southrepps, Stibbard, Sutton, Trunch, Tunstead, Weybourne and Worstead are reported as having available dry weather flow headroom to accommodate additional wastewater flows.</p> <p>The 3 settlements of Badersfield, Binham and Langham are recorded as not having capacity to accommodate additional flows from proposed growth, but have schemes identified in AW's PR24 Business Plan for AMP8 (2025-30) subject to final determination by OfWat, expected late December 2024. Once the growth scheme is confirmed, development would need to be phased for later in the plan period to align with delivery of the growth scheme at the WRC.</p> <p>The 5 settlements of Aldborough, Catfield, Erpingham, Felmingham and Roughton are recorded as not having capacity to accommodate additional flows from proposed growth and there is no proposed growth scheme within AW's PR24 Business Plan for AMP8 (2025-30). Growth would need to be phased for later in the plan period to align with future investment at the WRC's in subsequent AMPs.</p> <p>The settlement of Felmingham is only partially served by a small WRC that has a descriptive permit which only serves the Highfields housing estate. Such works are not designed to accommodate additional wastewater flows from the proposed level of growth, which has the potential to cause environmental harm. Recommends that:</p> <p>The settlement is excluded or that small scale development through infill development that wishes to connect to the network requires the developer to demonstrate that there is headroom to accommodate the flow (based on the developer monitoring flows for one year). In addition, AW would not object to growth in this settlement where the position is clear that development is not dependent on a foul drainage connection to the descriptive works.</p> <p>Itteringham does not have a public sewer network and therefore, growth will require private sewerage systems such as package treatment plants.</p>
Officer Response	<p>Comments are noted.</p> <p>The Council has liaised with Anglian Water throughout the local plan process and we welcome the updated information regarding the existing and additional SGVs. The methodology contained within the Distribution of Growth Background Paper 2 [Examination ref. C2] covers a range of important factors to ensure the settlements meet the NPPF's objectives of sustainable development.</p> <p>The potential development of the five SGVs (Aldborough, Catfield, Erpingham, Felmingham and Roughton) listed as not having capacity to accommodate additional flows from proposed growth and where there is no proposed growth scheme within AW's PR24 Business Plan for AMP8 (2025-30), has been placed towards the mid to late part of the Housing Trajectory.</p> <p>The Anglian Water investment strategy within the district is in part informed by the strategic plans of the Council, and the NPPF, in supporting the rural economy and the vitality of rural communities.</p>
Section	Proposed Change 13 - Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages
ID	FC551

Response Date	18/12/2024 15:03:00
Consultee Full Name	Sarah Luff
Consultee Organisation	Norfolk County Council (Lead Local Flood Authority)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	The LLFA note the changes proposed to Policy SS 1: Spatial Strategy in respect of increasing the number of Small Growth Villages in the District. It is also noted that a detailed environmental assessment of identified settlements has been carried out (based on the North Norfolk Strategic Flood Risk Assessment (SFRA) (2018) climate change flood risk layers in relation to fluvial, tidal and surface water flooding) in order to consider the degree to which growth in each of the remaining settlements may be constrained having regard to historic environment, flood risk, coastal erosion, environmental designations and landscape character. The LLFA advise that any proposed growth will need to take into consideration the environmental constraints associated with flood risk from all sources.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	General comment: Notes that the SGV assessments utilises the North Norfolk SFRA (2018) climate change flood risk layers in relation to fluvial, tidal and surface water flooding and advises that any proposed growth will need to consider the environmental constraints associated with flood risk from all sources.
Officer Response	Comments noted.
Section	Proposed Change 13 - Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages
ID	FC558
Response Date	18/12/2024 15:03:00
Consultee Full Name	Richard Doleman
Consultee Organisation	Principle Infrastructure Development Planner Norfolk County Council (Highways)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	The Highway Authority has no objection to the increase in the number of Small Growth villages as listed under point 12 or the increase in growth from 6% to 9% in all Small Growth Villages as stated in point 13.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	Support/ General comment: no objection to the increase in the number of Small Growth villages as listed under point 12 or the increase in growth from 6% to 9% in all Small Growth Villages as stated in point 13.

Officer Response	Comments noted.
Section	Proposed Change 13 - Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages
ID	FC569
Response Date	18/12/2024 15:03:00
Consultee Full Name	Paul Harker
Consultee Organisation	Place Planning Manager Norfolk County Council (Childrens Services)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	In relation to the increase in the spatial strategy linked to those proposed smaller villages and the percentage increase in the level of housing that could be granted. This could present some challenging scenarios for schools in those areas where there is limited ability to expand or alter the site layout to meet an increase in pupils, it would lead to NCC having to transport pupils to the next nearest school which impacts our ability to support sustainable transport throughout the county. To consider each site in turn we would need more detailed information in relation to the type and scale of housing to consider specific implications on schools.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	In relation to the increase in the spatial strategy linked to those proposed smaller villages and the percentage increase in the level of housing that could be granted. This could present some challenging scenarios for schools in those areas where there is limited ability to expand or alter the site layout to meet an increase in pupils, it would lead to NCC having to transport pupils to the next nearest school which impacts our ability to support sustainable transport throughout the county. To consider each site in turn we would need more detailed information in relation to the type and scale of housing to consider specific implications on schools.
Officer Response	Comments noted. Development in the SGVs is expected to be small scale and incremental over the plan period. As part of the local plan process the council has liaised throughout with the education authority, who ensure that education considerations are adequately accounted for in order that the appropriate authorities can plan and prioritise investment. Developer contributions for school places are usually sort at application stage in line with the most up to date population forecasts and when detailed scheme layouts are known. Parental choice and new build investment programmes also need to be factored into any education strategy.
Section	Proposed Change 13 - Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages
ID	FC594
Response Date	19/12/2024 12:03:00
Consultee Full Name	Gemma Clark
Consultee Organisation	Higher Officer, Sustainable Development, Norfolk Coast and Marine Team Natural England
Agent Full Name	
Agent Organisation	

<p>Does the Proposed Change contribute to the overall soundness of the Plan?</p>	<p>SEE ATTACHED FILES</p> <p>Natural England has no specific comment relating to the addition of 10 Small Growth Villages listed under Proposed Change 12 and 13 of the Further Consultation document. Where a site requires planning permission for a windfall development, Natural England would expect to see documents such as HRAs, Nutrient Neutrality Mitigation Strategies and calculations and SSSI assessments where an impact pathway has been identified. The new SSSI Impact Risk Zone (IRZs) tool can be used to map impact pathways and is available</p> <ul style="list-style-type: none"> • SSSI Impact Risk Zones (England) (arcgis.com) https://naturalengland-defra.opendata.arcgis.com/datasets/sssi-impact-risk-zones-england/explore • SSSI Impact Risk Zones (England) - data.gov.uk https://www.data.gov.uk/dataset/5ae2af0c-1363-4d40-9d1a-e5a1381449f8/sssi-impact-risk-zones-england • https://environment.data.gov.uk <p>It is also available on the free to use government's interactive mapping website MAGIC (defra.gov.uk) https://magic.defra.gov.uk</p> <p>By increasing the indicative level of housing growth in all Small Growth Villages from 6% to 9%, there will be increased recreational disturbance in rural areas and a potential loss of agricultural land as a potential 873 new dwellings could be built across all Small Growth Villages during the period 2024-40 (para 3.0.12). Growth could be mitigated as part of the GIRAMS strategy but you need to be satisfied that the strategy has taken into consideration the additional growth proposed as part of the Inspectors change.</p> <p>Please refer to the summary at the beginning of this letter [SEE BELOW] for Natural England's general observations around the increase of housing in the District and potential impacts.</p> <p>Summary of Natural England's advice</p> <ol style="list-style-type: none"> 1 Recreational disturbance to designated sites 2 Potential loss of best and most versatile (BMV) agricultural land 3 Impacts to National landscapes 4 Nutrient neutrality <p>We have reservations about the increased recreational pressure the additional sites will generate and the impact to designated sites on the coast. The Green Infrastructure and Recreational Avoidance Mitigation Strategy (GIRAMS) is a strategic solution to help with the in-combination effects of increased recreational disturbance. However, for large sites onsite green infrastructure may be required in addition to this payment to mitigate for the impacts of the development alone.</p> <p>Many of the site specific polices propose very small areas of green infrastructure which may not mitigate impacts to designated sites. Large development sites may require bespoke mitigation measures delivered within the designated sites identified. It is important that plan policy is sufficiently robust to enable the council to make prompt decisions at the application stage, without input from Natural England. (Please refer to Annex 1).</p> <p>There is also the potential loss of Best and Most Versatile (BMV) agricultural land. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver (please refer to Annex 2) and impacts to National Landscapes (see Annex 3).</p> <p>Lastly, we advise that for every allocation which is in a Nutrient Neutrality catchment, the policy stipulates that a Habitat Regulations Assessment (HRA), nutrient budget and mitigation strategy is submitted with a planning application.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>Include files</p>	<p>Natural England - Annex 1.pdf Natural England - Annex 2.pdf Natural England - Annex 3.pdf</p>
<p>Officer Summary</p>	<p>Natural England has no specific comment relating to the addition of 10 Small Growth Villages listed under Proposed Change 12 and 13 of the Further Consultation document. Where a site requires planning permission for a windfall development, Natural England would expect</p>

	<p>to see documents such as HRAs, Nutrient Neutrality Mitigation Strategies and calculations and SSSI assessments where an impact pathway has been identified.</p> <p>By increasing the indicative level of housing growth in all Small Growth Villages from 6% to 9%, there will be increased recreational disturbance in rural areas and a potential loss of agricultural land as a potential 873 new dwellings could be built across all Small Growth Villages during the period 2024-40 (para 3.0.12). Growth could be mitigated as part of the GIRAMS strategy but you need to be satisfied that the strategy has taken into consideration the additional growth proposed as part of the Inspectors change.</p>
<p>Officer Response</p>	<p>Comments noted.</p> <p>For clarification, both Proposed Changes 12 and 13 of the Further Consultation would increase the total indicative housing allowance for SGVs by 421 dwellings over the plan period (452 dwellings examined at submission stage). The overall figure of 873 dwellings proposed within Table 2 for SGV growth amounts to approximately 10% of the strategic housing growth target for the district, in line with the NPPF (paragraph 73, 2024). Therefore approximately 90% of the housing growth, through site allocations, is located adjacent to the larger settlements within the district.</p>

Proposed Change 14 - Update Section 7.5 of the Plan to align with the latest evidence in 'Appendix 4: Gypsy & Traveller Accommodation Needs Assessment'

Section	Proposed Change 14 - Update Section 7.5 of the Plan to align with the latest evidence in 'Appendix 4: Gypsy & Traveller Accommodation Needs Assessment'
ID	FC372
Response Date	18/12/2024 11:09:40
Consultee Full Name	Mrs Susie Cunningham
Consultee Organisation	Clerk Catfield Parish Council
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	No. The PC would also comment that Proposed Change 14 –“Update section 7.5 of the Plan to align with the latest evidence in Appendix 4: Gypsy and Traveller Accommodation Needs Assessment (2024)” - does not comply with the recent policy, entitled Planning Policy for Traveller Sites, published on 12th December 2024, and needs to be revised accordingly. The PC also submits that the provision of a permanent site by NNDC, with the appropriate facilities nearby, would not only ensure compliance with this new policy but also discourage retrospective planning applications for unauthorised development in the open countryside, such as the application which was recently refused by NNDC at Malthouse Lane (PF/23/0861).
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	To support the example we have provided within our comments.
Include files	
Officer Summary	No. The PC would also comment that Proposed Change 14 –“Update section 7.5 of the Plan to align with the latest evidence in Appendix 4: Gypsy and Traveller Accommodation Needs Assessment (2024)” - does not comply with the recent policy, entitled Planning Policy for Traveller Sites, published on 12th December 2024, and needs to be revised accordingly. The PC also submits that the provision of a permanent site by NNDC, with the appropriate facilities nearby, would not only ensure compliance with this new policy but also discourage retrospective planning applications for unauthorised development in the open countryside, such as the application which was recently refused by NNDC at Malthouse Lane (PF/23/0861).
Officer Response	Comment noted: no reasoning is provided as to why the PC believe the approach does not comply.
Section	Proposed Change 14 - Update Section 7.5 of the Plan to align with the latest evidence in 'Appendix 4: Gypsy & Traveller Accommodation Needs Assessment'
ID	FC473
Response Date	19/12/2024 10:48:00
Consultee Full Name	Cllr Victoria Holliday
Consultee Organisation	Member for Coastal Ward (NNDC)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	Should there be greater consideration of the health and educational needs of Gypsy and Traveller households in the Gypsy, Traveller & Travelling Showpeople's Accommodation (Policy HOU7)? The inequalities in health and education in these populations are well documented and raised in the stakeholder consultation. In addition to assessing the overall

	<p>accommodation requirements in terms of sites and pitches, some thought could be given to the locations in terms of access to health and educational provision.</p> <p>For example, Policy HOU7, point f might read 'the site is in a sustainable location on the outskirts of, or within a reasonable distance of, a settlement which offers local services and community facilities, including health and educational provision'.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	<p>Should there be greater consideration of the health and educational needs of Gypsy and Traveller households in the Gypsy, Traveller & Travelling Showpeople's Accommodation (Policy HOU7)? The inequalities in health and education in these populations are well documented and raised in the stakeholder consultation. In addition to assessing the overall accommodation requirements in terms of sites and pitches, some thought could be given to the locations in terms of access to health and educational provision.</p> <p>For example, Policy HOU7, point f might read 'the site is in a sustainable location on the outskirts of, or within a reasonable distance of, a settlement which offers local services and community facilities, <i>including health and educational provision</i>'.</p>
Officer Response	<p>Comments noted, limiting settlements to those with only direct access to health services e.g. doctors' surgery and education services e.g. schools would significantly restrict and reduce flexibility and choice in relation to location.</p> <p>Such services are located in higher order and less prevalent in the small growth settlements however they serve a large catchment and as such the location of potential suitable sites should not be restricted to the locations where there is a physical provision. The policy as written provides equal access to these services but also other important local services</p> <p>Disagree with the suggested change.</p>
Section	Proposed Change 14 - Update Section 7.5 of the Plan to align with the latest evidence in 'Appendix 4: Gypsy & Traveller Accommodation Needs Assessment'
ID	FC553
Response Date	18/12/2024 15:03:00
Consultee Full Name	Sarah Luff
Consultee Organisation	Norfolk County Council (Lead Local Flood Authority)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	The LLFA note the changes proposed and in particular the updating of Section 7.5 of the Plan to align with the latest evidence in 'Appendix 4: Gypsy & Traveller Accommodation Needs Assessment (2024)' which increased the need for Gypsy and Traveller Pitches from 9 to 11 pitches. The LLFA have no comments to make in respect of the proposed changes.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	The LLFA note the changes proposed and in particular the updating of Section 7.5 of the Plan to align with the latest evidence in 'Appendix 4: Gypsy & Traveller Accommodation Needs Assessment (2024)' which increased the need for Gypsy and Traveller Pitches from 9 to 11 pitches. The LLFA have no comments to make in respect of the proposed changes.

Officer Response	Noted.
Section	Proposed Change 14 - Update Section 7.5 of the Plan to align with the latest evidence in 'Appendix 4: Gypsy & Traveller Accommodation Needs Assessment'
ID	FC556
Response Date	18/12/2024 15:03:00
Consultee Full Name	Richard Doleman
Consultee Organisation	Principle Infrastructure Development Planner Norfolk County Council (Highways)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	The Highway Authority has no objection to updating section 7.5 of the plan to increase the need for Gypsy and Traveller Pitches from 9 to 11 pitches.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	The Highway Authority has no objection to updating section 7.5 of the plan to increase the need for Gypsy and Traveller Pitches from 9 to 11 pitches.
Officer Response	Noted.
Section	Proposed Change 14 - Update Section 7.5 of the Plan to align with the latest evidence in 'Appendix 4: Gypsy & Traveller Accommodation Needs Assessment'
ID	FC595
Response Date	19/12/2024 12:03:00
Consultee Full Name	Gemma Clark
Consultee Organisation	Higher Officer, Sustainable Development, Norfolk Coast and Marine Team Natural England
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	Natural England has no comments to make on Proposed Change 14.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	Natural England has no comments to make on Proposed Change 14.
Officer Response	Noted.
Section	Proposed Change 14 - Update Section 7.5 of the Plan to align with the latest evidence in 'Appendix 4: Gypsy & Traveller Accommodation Needs Assessment'

ID	FC599
Response Date	24/12/2024 09:57:00
Consultee Full Name	Mr Harry Skinner
Consultee Organisation	Planning Advisor (Sustainable Places Team) Environment Agency - Sustainable Places
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Policy HOU 7 outlines the provision of a minimum of 11 permanent pitches to meet the accommodation needs of the district's Gypsy & Traveller community and is supported by 'Appendix 4: Gypsy & Traveller Accommodation Needs Assessment (2024)'.</p> <p>It should be noted that, as stated in Annex 3 of the NPPF, the flood vulnerability class of these sites could be "highly vulnerable" if the sites are to include "Caravans, mobile homes and park homes intended for permanent residential use". When cross-referenced to Table 2 in the Flood Risk and Coastal Change PPG, site uses classed as "highly vulnerable" should not be permitted in Flood Zones 3a or 3b and could only be permitted in Flood Zone 2 if the Exception Test was passed. The evidence base should be clear for which flood vulnerability class that these sites fall into and whether they are appropriate or not to the Flood Zone (now or in future).</p> <p>We should therefore be able to see the rationale behind the allocation of this land and the discounting of any alternatives, with references to the SFRA used to support choices. As with the location of any other type of land use, flood risk should be a key consideration given that it is associated with hazard and danger. This is especially pertinent given the nature of caravans, mobile and park homes and their vulnerability to flood risks. As stated above, caravans intended for permanent residential use are regarded as 'highly vulnerable'. The instability of such structures places their occupants at special risk, and they are likely to be occupied during periods when flood risk is likely to be higher. Additionally, in the event of a flood, occupants may have no other place of residence available and could lose all their possessions as caravans are not flood resilient.</p> <p>Appendix E of the originally submitted Sustainability Appraisal, Policy HOU 7 and this updated Needs Assessment for Gypsy, Traveller & Travelling Showpeople's Accommodation do not include flood risk rationale in the site selection. We are concerned that there is no apparent flood risk evidence to support the proposed location of these sites, and as such, we do not know if they are located in high or medium flood risk zones or are subject to other sources of flood risk, e.g. in surface water flow paths or ponded areas. It is therefore important to show that the flood risk Sequential Approach has been considered in the justification for site selection, using data from the SFRA as evidence base.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	<p>It should be noted that, as stated in Annex 3 of the NPPF, the flood vulnerability class of these sites could be "highly vulnerable" if the sites are to include "Caravans, mobile homes and park homes intended for permanent residential use". When cross-referenced to Table 2 in the Flood Risk and Coastal Change PPG, site uses classed as "highly vulnerable" should not be permitted in Flood Zones 3a or 3b and could only be permitted in Flood Zone 2 if the Exception Test was passed. The evidence base should be clear for which flood vulnerability class that these sites fall into and whether they are appropriate or not to the Flood Zone (now or in future).</p> <p>Appendix E of the originally submitted Sustainability Appraisal, Policy HOU 7 and this updated Needs Assessment for Gypsy, Traveller & Travelling Showpeople's Accommodation do not include flood risk rationale in the site selection. We are concerned that there is no apparent flood risk evidence to support the proposed location of these sites, and as such, we do not know if they are located in high or medium flood risk zones or are subject to other sources of flood risk, e.g. in surface water flow paths or ponded areas. It is therefore important to</p>

	<p>show that the flood risk Sequential Approach has been considered in the justification for site selection, using data from the SFRA as evidence base.</p>
<p>Officer Response</p>	<p>Comments noted.</p> <p>The assessment of flood risk is detailed through policy CC7. In assessing any application, the development plan should be taken as a whole, and relevant development plan policies will be applied. As such there is no need to repeat the requirements for complying with national flood policy including where appropriate the sequential and exception tests and proposals for vulnerable development which are included in policy CC7 at criteria 2a and 5.</p> <p>Appendix E of the original submitted sustainability Appraisal details alternative site proposals, and the policy approach does not propose any specific locations. The policy reference to G& T in the submitted Plan is in fact HOU5 so is not detailed in this appendix. The updated needs Assessment does also not review any specific locations but rather is an assessment and evaluation of need. Flood risk is part of a number of the SA objectives as detailed in Table 4 The SA Framework on page 49 of the original submitted document [Reference A3]</p> <p>No specific sites are identified in the submitted approach nor in the further consultation material, the approach is based around the use of policy criteria on a case by case basis and flood risk would be part of the assessment at application stage using the specific flood risk policy CC7.</p> <p>In relation to the further consultation material and this proposed change the LLFA advised they have no comments to make.</p>

Local Plan Further Consultation Schedule of Representations (Appendices)

Supporting Document: Appendix 1 - Additional Sites Review

Section	Supporting Document: Appendix 1 - Additional Sites Review
ID	FC153
Response Date	06/12/2024 15:33:04
Full Name	Mr Russell Reeve
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>HV05 Land at Horning Road, Hoveton is not a sensible site for additional housing It does not provide a suitable route for transporting sewage to Belaugh WWTP. It has poor highways access, making safe entry/ exit a challenge. It is less well located than some other option sites. It is again, prime agricultural land. The development would be highly visible, on higher land Full development of the site would hinder future expansion of the industrial estate to the North, off Littlewood Lane, which is the better option here.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	HV05 would not be a sensible potential development site for additional housing in/ around Hoveton
Include files	
Officer Summary	<p>Object: HV05 Land at Horning Road, Hoveton is not a sensible site for additional housing It does not provide a suitable route for transporting sewage to Belaugh WWTP. It has poor highways access, making safe entry/ exit a challenge. It is less well located than some other option sites. It is again, prime agricultural land. The development would be highly visible, on higher land Full development of the site would hinder future expansion of the industrial estate to the North, off Littlewood Lane, which is the better option here.</p>
Officer Response	<p>Comments noted. As expressed in the Additional Sites Review Background Paper, the Council reviewed HV05 as a possible option as an additional proposed allocation however, it was concluded that the site was not a suitable. More detail on this conclusion can be found in the Additional Sites Review Background Paper (page, 14).</p>
Section	Supporting Document: Appendix 1 - Additional Sites Review
ID	FC158
Response Date	06/12/2024 16:28:37
Full Name	Mr Ben Bethell
Organisation	Clerk and RFO Hoveton Community (Parish) Council
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE No. The proposed change is not well considered. It is not justified.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes

If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	As a Council with close ties to its community, we take these matters very seriously and would expect to be part of discussions at ALL stages.
Include files	NNDC LP response - Consultation December 2024 - Hoveton Community Council Addendums.pdf
Officer Summary	HV05 Land at Horning Road, Hoveton is not a sensible site for additional housing It does not provide a suitable route for transporting sewage to Belaugh WWTP. It has poor highways access, making safe entry/ exit a challenge. It is less well located than some other option sites. It is again, prime agricultural land. The development would be highly visible, on higher land. Full development of the site would hinder future expansion of the industrial estate to the North, off Littlewood Lane, which is considered to be the more necessary option.
Officer Response	Comments noted. As expressed in the Additional Sites Review Background Paper, the Council reviewed HV05 as a possible option as an additional proposed allocation however, it was concluded that the site was not a suitable. More detail on this conclusion can be found in the Additional Sites Review Background Paper (page, 14).
Section	Supporting Document: Appendix 1 - Additional Sites Review
ID	FC173
Response Date	08/12/2024 18:25:02
Full Name	Mrs Hilary Reeve
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	HV05 Land at Horning Road, Hoveton is not a sensible site for additional housing It does not provide a suitable route for transporting sewage to Belaugh WWTP. It has poor highways access, making safe entry/ exit a challenge. It is less well located than some other option sites. It is again, prime agricultural land. The development would be highly visible, on higher land Full development of the site would hinder future expansion of the industrial estate to the North, off Littlewood Lane, which is the better option here.
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	Object: HV05 Land at Horning Road, Hoveton is not a sensible site for additional housing It does not provide a suitable route for transporting sewage to Belaugh WWTP. It has poor highways access, making safe entry/ exit a challenge. It is less well located than some other option sites. It is again, prime agricultural land. The development would be highly visible, on higher land Full development of the site would hinder future expansion of the industrial estate to the North, off Littlewood Lane, which is the better option here.
Officer Response	Comments noted. As expressed in the Additional Sites Review Background Paper, the Council reviewed HV05 as a possible option as an additional proposed allocation however, it was concluded that the site was not a suitable. More detail on this conclusion can be found in the Additional Sites Review Background Paper (page, 14).
Section	Supporting Document: Appendix 1 - Additional Sites Review
ID	FC320
Response Date	17/12/2024 11:22:00

Full Name	Mr Dennis Willis
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>REF:https://www.north-norfolk.gov.uk/media/10669/fc002-additional-sites-review.pdf. 3.7 fails to refer to surface water flooding and impact it will have on nearby properties. 3.8 fails to refer to the drainage ditch behind the hedgerow alongside Stalham Road. The geology of both the above site has an incline towards the south east which will exacerbate existing nearby surface flooding issues. The word coalescence is incorrect. This development WILL bring together properties creating one mass.</p> <p>REF: Appendix 1: Additional Sites Assessment.</p> <p>HV01/C: Promoters intend to provide off-site Nutrient mitigation via the purchasing of credits. UNACCEPTABLE WRC should be upgraded to accept and process increase in nutrients.The Sustainability Appraisal assessed the site as Positive. Because of above comments I cannot concur with site being positive.</p> <p>HV06/A SA: Economic – Scores positively. DISAGREE. Education, transport links and services already overloaded.</p> <p>Highways: Access onto Stalham Road is acceptable. Unacceptable unless to present roundabout only.</p> <p>Promoters intend to provide off-site Nutrient mitigation via the purchasing of credits.UNACCEPTABLE WRC should be upgraded to accept and process increase in nutrients.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	<p>REF:https://www.north-norfolk.gov.uk/media/10669/fc002-additional-sites-review.pdf. 3.7 fails to refer to surface water flooding and impact it will have on nearby properties. 3.8 fails to refer to the drainage ditch behind the hedgerow alongside Stalham Road. The geology of both the above site has an incline towards the south east which will exacerbate existing nearby surface flooding issues. The word coalescence is incorrect. This development WILL bring together properties creating one mass.</p> <p>REF: Appendix 1: Additional Sites Assessment.</p> <p>HV01/C: Promoters intend to provide off-site Nutrient mitigation via the purchasing of credits. UNACCEPTABLE WRC should be upgraded to accept and process increase in nutrients.The Sustainability Appraisal assessed the site as Positive. Because of above comments I cannot concur with site being positive.</p> <p>HV06/A SA: Economic – Scores positively. DISAGREE. Education, transport links and services already overloaded.</p> <p>Highways: Access onto Stalham Road is acceptable. Unacceptable unless to present roundabout only.</p> <p>Promoters intend to provide off-site Nutrient mitigation via the purchasing of credits.UNACCEPTABLE WRC should be upgraded to accept and process increase in nutrients.</p>
Officer Response	<p>Comments noted. Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belough Water Recycling Centre as required by the relevant site-specific policies and Anglian Water. More detail on this proposal is set out in the representations provided by the promoter at Regulation 19, which also includes reference to improvements to the Brook Park pumping station. Furthermore, both site-specific policies include requirements for enhancements towards sewerage infrastructure which should be undertaken prior to first occupation in order</p>

	<p>to prevent detriment to the environment and comply with the Water Framework Directive obligations.</p> <p>The site is suitable infill development that does not cause the coalescence of two settlements but connects the existing settlement boundary along Stalham Road. Hoveton is identified as a Small Growth Town in the Local Plan's Settlement Hierarchy and Policy SS1 due to the provision of services and close connectivity to Wroxham's own services and facilities therefore, it is a sustainable location for development. Identifying growth in this area is in line with the Local Plan's strategy.</p> <p>The site-specific policy for both sites include requirements for a Transport Assessment to be undertaken for both proposed allocations in Hoveton that identifies sustainable traffic mitigation measures that will alleviate the potential cumulative impacts on the road network.</p>
Section	Supporting Document: Appendix 1 - Additional Sites Review
ID	FC421
Response Date	18/12/2024 21:57:53
Full Name	Ms Hannah Gent
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>MUN03/A is not an appropriate site for additional housing due to access.</p> <p>In the Additional Sites Review Background Paper it states that the principle has already been established through the previous public examination sessions. Originally this area of the development was being proposed as green/open space NOT as an area to be used for housing.</p> <p>It has limited highways access - only one suitable area for access (South) which is in close proximity to 3 other roads (All Saints Way, Links Road & Warren Drive) accessing the highway - making safe entry/ exit a challenge.</p> <p>The development would be highly visible as it sits on higher land than Church Lane.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	<p>Object: MUN03/A is not an appropriate site for additional housing due to access. In the Additional Sites Review Background Paper it states that the principle has already been established through the previous public examination sessions. Originally this area of the development was being proposed as green/open space NOT as an area to be used for housing.</p> <p>It has limited highways access - only one suitable area for access (South) which is in close proximity to 3 other roads (All Saints Way, Links Road & Warren Drive) accessing the highway - making safe entry/ exit a challenge.</p> <p>The development would be highly visible as it sits on higher land than Church Lane.</p>
Officer Response	<p>Comments noted. The site-specific policy identifies access to be provided onto Cromer Road however, the exact location is yet to be determined and will be identified through the application process. The Highways Authority are supportive of access onto Church Lane for both areas of development within the site. The site-specific policy includes requirements to provide landscaping and open space which will help mitigate the site's visibility to the wider area.</p>
Section	Supporting Document: Appendix 1 - Additional Sites Review
ID	FC463
Response Date	17/12/2024 11:22:00
Full Name	Mr Dennis Willis
Organisation	

Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	Appendix 2: HV1/C The topography of the site is largely flat. UNTRUE HV06/A: The topography of the site is largely flat UNTRUE. Landscape features fails to identify drainage ditch. https://www.north-norfolk.gov.uk/media/10666/fc006-sustainability-appraisal-addendum.pdf
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	Object: Respondent does not agree with the topography descriptions of sites HV01/C and HV06/A within the Heritage Impact Assessments - Appendix 2 of the Additional Sites Review Background Paper. No additional information is provided for site HV01/C. Site HV06/A is described as having a drainage ditch.
Officer Response	Comments noted. Disagree: The Heritage Impact Assessments (HIAs) provide consistent high level information for the purposes of assessing the potential impact on any historic buildings or features within the vicinity of a site. The landscape assessment for both HV01/C and HV06/A are appropriate for the purposes of the assessment, and where the presence of a drainage ditch is not considered to be a relevant factor, in this instance.
Section	Supporting Document: Appendix 1 - Additional Sites Review
ID	FC511
Response Date	18/12/2024 16:59:00
Full Name	
Organisation	Richborough Estates
Agent Full Name	Simon Atha
Agent Organisation	Associate Director Boyer on behalf of Richborough
Does the Proposed Change contribute to the overall soundness of the Plan?	The Council have produced an Additional Sites Review Background Paper at Appendix 1 to the Consultation Document. This Background Paper has been prepared to support the continued Local Plan examination and to review the potential additional sites and options for extending existing allocations in the Local Plan. The sites have been collated into two separate groups – A and B sites. The Group A sites are those that have been selected through a review of individual site assessments contained within each Site Assessment Booklet. The additional sites are mostly those that were previously assessed through the Local Plan's Site Assessment Process and were considered to be suitable for development but were not identified for allocation. The Council's rationale at the time being that there being more sites than were needed to meet the housing requirement for that specific settlement or, a different site in the same location provided better opportunities for community benefit. As part of the Group A sites, the Council have reviewed and included opportunities to expand existing allocations where there is an appropriate option to do so. The Group A sites that are proposed for allocation in the Local Plan as a result of the Consultation Document are as follows: <ul style="list-style-type: none"> • C10/1, Land at Runton Road/Clifton Park, Cromer • C22/4, Land West of Pine Tree Farm, Cromer (Extension to existing allocation) • NW16, Land at End of Mundesley Road, North Walsham • ST19/B, Land adjacent to Ingham Road, Stalham (Extension to existing allocation) • LUD01/C, Land South of School Road, Ludham (Extension to existing allocation)

- MUN03/A, Land off Cromer Road & Church Lane, Mundesley (Extension to existing allocation)
- BLA01/B Land West of Langham Road, Blakeney
- F05, Land between Holt and Greenway Lane, Fakenham
- HV01/C, Land East of Tunstead Road, Hoveton (Extension to existing allocation)
- HV06/A, Land at Stalham Road, Hoveton
- BRI02/C, Land at Astley Primary School, Briston

Group B sites have been identified as potentially suitable but have not been actively promoted and therefore may not be immediately deliverable and as such the Council have not put them forward as allocations in the Local Plan.

We are **supportive** of the Council's position taken in relation to the assessment of additional sites to be included as site allocations within the Local Plan to deliver the shortfall identified by the Inspector in the housing requirement. The Council has selected sites based on deliverability, suitability, availability, with a focus on those sites able to come forward within the first five years of the plan period to deliver a 5 year housing land supply.

Richborough are promoting Land at End of Mundesley Road, North Walsham (ref: NW16). We fully agree with and support the Council's assessment of the site at para 3.4 of Appendix 1. The site will make a significant and demonstrable contribution to the Council's five-year housing land supply and overall housing requirement for both market and affordable housing.

In relation to the other Group A sites proposed as allocations, based on our knowledge of these sites, we are supportive of their allocation within the Local Plan and assessments made by the Council in respect of their capacity, availability and deliverability across the plan period.

Appendix 1 to the Additional Sites Background Paper sets out the detailed assessment of each individual site based on a number of factors and considerations that the Council have used to inform the site selection process.

For NW16 Land End of Mundesley Road, North Walsham, Richborough are supportive of the Council's assessment and consider that this reflects an accurate picture of the site.

The Sustainability Appraisal scores NW16 overall as negative and positive. Under environmental considerations, the scores are mixed. It scores well being edge of settlement, in Flood Zone 1 with low / low to moderate susceptibility to ground water flooding. The SA states that there is the potential to affect setting of Grade II Listed Building (The Thatched Cottage). As part of the technical work to underpin Richborough's outline planning application a Built Heritage Statement has been prepared. This considers the impact of the proposed development on The Thatched Cottage and concludes that less than substantial harm would take place to this heritage asset given the distance from the site and intervening vegetation screening the setting from views.

The SA considers that there would be potential negative biodiversity impact as the site includes land of County Wildlife Status (Paston Way & Knaption Cutting), arable, mature trees / hedgerow to the majority of boundaries. The ecological surveys undertaken to support the outline planning application undertaken by Richborough, consider the detailed impact on the Paston Way as a result of the development and need to bridge the Paston Way. Overall, it is considered that this negative impact to biodiversity can be appropriately mitigated and enhancements provided to the Paston Way and within the site to deliver a minimum of a 10% net gain to biodiversity. It was also considered a negative, the loss of best and most versatile agricultural land. However, positively the SA set out the localised potential to contribute to the GI network.

In respect of the social strand of sustainability, the site scores positively; it is on the edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities.

In respect of the economic strand of sustainability, the site scores positively by being on the edge of settlement with good access to employment, services / facilities, transport links, access to educational facilities, there is high speed broadband in vicinity and the town centre is easily accessible from the site.

Overall we **support** the Council's assessment of the site and conclude that subject to the usual technical constraints to be assessed, mitigated and designed out through the outline planning application process, the site is suitable as a housing allocation.

Do you consider it necessary to participate in a public hearing session, should these be required?

Yes

If you wish to participate in a hearing session(s), please

outline why you consider this to be necessary:	
Include files	
Officer Summary	<p>SUPPORT: We are supportive of the Council's position taken in relation to the assessment of additional sites to be included as site allocations within the Local Plan to deliver the shortfall identified by the Inspector in the housing requirement. The Council has selected sites based on deliverability, suitability, availability, with a focus on those sites able to come forward within the first five years of the plan period to deliver a 5 year housing land supply. We fully agree with and support the Council's assessment of the site at para 3.4 of Appendix 1. The site will make a significant and demonstrable contribution to the Council's five-year housing land supply and overall housing requirement for both market and affordable housing.</p> <p>For NW16 Land End of Mundesley Road, North Walsham, Richborough are supportive of the Council's assessment and consider that this reflects an accurate picture of the site. The SA considers that there would be potential negative biodiversity impact as the site includes land of County Wildlife Status (Paston Way & Knapton Cutting), arable, mature trees / hedgerow to the majority of boundaries. The ecological surveys undertaken to support the outline planning application undertaken by Richborough, consider the detailed impact on the Paston Way as a result of the development and need to bridge the Paston Way. Overall, it is considered that this negative impact to biodiversity can be appropriately mitigated and enhancements provided to the Paston Way and within the site to deliver a minimum of a 10% net gain to biodiversity.</p> <p>Overall we support the Council's assessment of the site and conclude that subject to the usual technical constraints to be assessed, mitigated and designed out through the outline planning application process, the site is suitable as a housing allocation.</p>
Officer Response	<p>Comments and support noted. The Council will continue to engage with the site promoter to ensure the site's delivery. Through ongoing engagement with the site promoter the site-specific policy includes the mitigation and enhancement of the County Wildlife Site and existing mature trees and hedgerows, the site will also be required to provide Open Space in compliance with Local Plan policy, all of which will help mitigate the concerns raised through the SA.</p>

Supporting Document: Appendix 2 - Distribution of Growth (Small Growth Villages) Addendum

Section	Supporting Document: Appendix 2 - Distribution of Growth (Small Growth Villages) Addendum
ID	FC68
Response Date	02/12/2024 12:15:30
Full Name	Mr Rob Hetherington MBE
Organisation	Vice Chairperson Tunstead Parish Council
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILES</p> <p>At its 26th November 2024 meeting Tunstead Parish Council voted to respond to the Consultation regarding the New Local Plan as the criteria for changing our designation from Countryside to Small Growth Village has not been correctly and consistently applied in the way it has for other Countryside villages. The council asked me, as Vice Chairperson to respond on their behalf and our rationale is as follows.</p> <p>The proposed change to include Tunstead as a Small Growth Village is not consistent with the methodology identified by the inspector and modified by NNDC as outlined in Matter 2, Question 2.2 - Additional information requested regarding Small Growth Villages.</p> <p>This methodology states that new SGVs should have a minimum of 1key services and 2/3 secondary/desirable services and table A in the paper provides NNDC assessment of small villages against this criteria. This assessent is clarified by using green to show a full service exists, red to show the service does not exist and amber to show limited, infrequent or remote services. In relation to Tunstead this assessment shows in table 1 that we have 1 full key service (green) and three secondary or desirable services (green) indicating that these services offer full unlimited delivery. Paragraph A states that these assessments were arrived at through a "desktop study" therefore without any checks being carried out to verufy the actual status of the service in question.</p> <p>NNDC have incorrectly classified the services provided in all three of the secondary/desirable serices. Each one of these services offers a limited and infrequent service and one could also be said to be remote depending upon where you live in the parish and your access to transport as well as issues of safe access.</p> <p>The key service, our primary school, is identified as a full service and this is correct. Our secondary services, the pub and the village hall, are identified as each offering a full service, which is incorrect in both locations.</p> <p>The Horse and Groom Public House operates on four days, two of which, Thursday and Friday from 17.00 to 22.00 and one, Saturday from 12.00 to 22.00 and the other, Sunday, from 12.00 to 17.00. It is closed completely on the other three days and regularly reduces either the number of hours or days it is open on other occassions and often without notice to residents. This can only be classed as a limited an infrequent service.</p> <p>The Village Hall offers an even more limited service to residents as it is not open at all during the day and most nights. It has recently only been open at night for a monthly bingo session and village hall committee meetings. The village hall is not accessible to people with disabilities as the only access is via old wooden stairs with no ramp and the road leading to it is also in a poor state of repair which led to NNDC CEO recently stating that this would prevent the hall being used as a polling station even if it was in a better state of repair. In essence it is a very old (supposedly temporary) portacabin that is past its useful lifespan and we are trying to replace it but are a long way off doing so. Here again this can only be classed as a limited and infrequent service.</p> <p>Finally the church has been identified as a desirable service and rated green. According to its website the church is open 24 hours but there is no-one in attendance, apart from opening and losing it, for the vast majority of this time and indeed it is closed and locked from dusk until dawn each day. According to its website there are only two services a month, both on a Sunday, delivered at the church in Tunstead. Here again it is obvious that the assessment should show that the church offers a limited and/or infrequent service to residents of Tunstead. Also neither the village hall or the church can be classed as having a safe and sustainable access. I have already highlighted the issues around the village hall and state of the access track and the church can only be accessed by leaving Market Street and going down a rural single track road with no pavement and as such is not safe/sustainable. As these issues has been taken into account in other assessemnst they should also be included in Tunstead's and therefore makes these two services even less accessible and therefore the green rating should be changed to amber.</p>

Looking at how the assessments have been arrived at it is clear that Tunstead should be shown as having one green Key Service and three amber Secondary/Desirable services. When this is compared with the other villages it is apparent that Tunstead should not be classed as a SGV as we do not have the range of services delivered appropriately and consistently that would lead us to be classed as a SGV given the methodology used and in comparison to other similar villages. The Parish Council therefore believes that the change is not positively prepared, is not effective, is not justified and is not consistent with the policy recommended by the inspector or used by NNDC when comparing us to other villages shown in the documents. As such we should be removed from the list of Small Growth Villages and retain our current designation as Countryside.

In addition there are also clearly issues with the level of the assessments that have been made regarding Tunstead, and other villages, that must lead to some doubt about their validity in this process. For example the HNA is largely made up of the District Analysis and does not reflect Tunstead's situation. We are shown as having 734 people on the housing list who expressed an interest in living in Tunstead? Other villages that form part of this assessment are similar. Indeed if you add these all up you reach a figure of 7312 people on the waiting list who have expressed an interest to live in these villages, whilst the HNA shows that the waiting list in the district at 15/8/2024 was only 2336? Clearly there is some element of double counting within the calculations but this should have been identified as the figures do not make sense and some recognition of the situation should have been made. Tunstead only has a population of around 750 with around 314 properties, not 405 as our assessment identifies and, as the assessment correctly identifies no available sites. The parish council is going through the Neighborhood Plan development stage and have produced a draft HNA and Design Guide and I am sure they would share this with the Local Plan Team if asked.

One of the questions we are asked to give a view on is "is the change effective?". In this case the answer is easy and is provided by the details in the assessment itself. In the information regarding "supply of suitable sites" NNDC comments that "The Council's Housing and Economic Land Availability Assessment did not identify any potentially suitable sites" and no numbers have been given for housing numbers in Tunstead in the document whereas all of the other new SGVs have been given allocations. The assessment also comments that Tunstead offers "lower levels of viability in the District." In addition the revised settlement boundaries plan shows no new development sites but instead has only included residents gardens as new areas within the settlement boundaries. This indicates that the only option for development in these sites will be infill, if any come forward and are suitable, and it is my understanding that such new build would not count towards the revised District targets. There really is no point in trying to push through a change which, as far as Tunstead is concerned, appears undeliverable given NNDC's own assessment.

The next comment is with regards to the Conclusion provided by NNDC regarding built environment and known infrastructure constraints and comments that "for Tunstead it is considered that the constraints would not limit the principle of development within the settlement." Perhaps it would be helpful for the Local Plan Team to review the planning decision for NNDC Ref: PF/24/0665 which relates to a proposed development outside of but adjoining the Southern Settlement Boundary and which was refused by NNDC on 21st October 2024. The decision letter consists outlines a number of factors that would be issues of relevance to any new developments in the revised boundary including infrastructure and environment. Concerns were also expressed by Anglian Water and NNDC Environmental Protection Team during the process which supported evidence residents have regarding the current flooding situation that has not been recognised in this assessment which uses the 2018 assessment as the benchmark. These comments recognise the current situation in Tunstead and especially in the revised development area to the South of Market Street. The drainage system here is currently not sufficient for the development we have and both AW and NNDC Environmental Protection recognise this in their submissions. Any new development in this area will require significant improvements in the drainage system that we have, and funded, prior to any development taking place. There are also similar drainage issues in the revised development area to the North of the village with work ongoing from Anglian Water to make limited improvements to the current system.

Our final comments relate to the "effective and justified" questions you have raised. We believe that there is no justification for the changes proposed to Tunstead's development designation as the assessments are flawed and do not provide an up to date picture of the village. NNDC have also simply got the description of the facilities wrong. Any changes will not be effective as there is very little, if any, scope for development to take place in the development areas identified with, as NNDC comment themselves "no potentially suitable sites." Given that NNDC's view is that in the other sites listed in their assessment there are "potentially 1793 dwelling" there is surely sufficient capacity, when added to the other development sites in NNDC, without adding another clearly unsuitable village in Tunstead to the list.

<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>Include files</p>	<p>IMG_20241122_173436951_MFNR.jpg (2) Tunstead Village Hall & Recreation Ground - Events.html (1) St. Maryâ s Church â Tunstead & Sco-Ruston.html</p>
<p>Officer Summary</p>	<p>Object: with regard Appendix 2: Distribution of Growth (SGV) Addendum, Tunstead has limited services in terms of the three secondary/ desirable services listed - village hall, church and pub, in relation to frequency of opening hours and are not easily accessible. As such, these should be listed as limited services (amber) and not counted as full services (green) and as such, Tunstead should not be designated as a Small Growth Village and it should remain within the Countryside designation.</p> <p>There are issues with the level of assessments conducted which leads to doubt over their validity and it is flawed in relation to Tunstead. For example, the Housing Needs Assessment (HNA) figures for Tunstead and other villages assessed far exceed the total number on the Housing Waiting List (HWL). The parish council is going through the Neighbourhood Plan development stage and have produced a draft HNA and Design Guide</p> <p>No HELAA sites were allocated in Tunstead, unlike all of the other SGVs. The revised settlement boundaries plan shows no new development sites but instead has only included residents gardens as new areas within the settlement boundaries. Therefore, the only likely development that will come forward is infill development.</p> <p>Reference should be made to the recent planning application that was refused PF/24/0665 with particular regard to infrastructure, environment and significant surface water flooding in the area of the site adjacent to the southern settlement boundary, where local residents supplied evidence of the situation on the ground. In addition, the application received an objection from Anglian Water on the grounds of sewer flooding. There are also similar drainage issues in relation to the revised settlement boundary to the north of the village with work ongoing from Anglian Water to make limited improvements to the current system.</p> <p>The Parish Council therefore believes that the change is not positively prepared, is not effective, is not justified and is not consistent with the policy recommended by the inspector or used by NNDC when comparing Tunstead to other villages shown in the documents.</p>
<p>Officer Response</p>	<p>Disagree: The methodology for the assessment of Small Growth Villages has been consistently applied to all of the existing and proposed additional Small Growth Villages, including in terms of how the key, secondary and desirable services have been assessed. The frequency of opening times for a small number of facilities have been recorded for the assessment of the SGVs, being for Post Offices and GP Surgeries (see Appendix 3 within the Distribution of Growth Background Paper 2 [Examination ref. C2]). The majority of the facilities and services including churches, pubs and village halls, have not been assessed in terms of their frequency of use/ opening times because such facilities are known to have a low frequency of use, for example church services and events usually take place at a low frequency in terms of days and times, village halls will be used on an ad hoc basis, usually dependent on the level of usage by community groups and functions. The opening times of pubs varies widely but is traditionally evenings and operationally, these are usually tailored to their offer for example, food during the day/evening, availability of a function room for hire, weekly events etc. Consequently, none of the village assessments have recorded frequency of use/ opening times for churches, pubs and village halls, with all being recorded as available (green) or not (red) on Appendix 3 of Background Paper 2. Helpfully, the three attached documents/photo highlight the current uses of the village hall building, pub and church.</p> <p>Identification of Tunstead as a SGV will direct future growth to the village and help retain these existing facilities and services and support their enhancement and frequency of use.</p> <p>The Council's HELAA, 2017 provides a snapshot of capacity based on the data available, it does not represent policy or determine whether growth can or not be delivered. The approach through policy SS1 sets out that planning permission will be supported subject to proposals according with the criteria 3 of the policy. This includes sites adjacent to the proposed settlement boundary. As agreed at the Hearing Sessions in early 2024, any development that comes forward within the settlement boundary of SGVs will be counted separately as windfall development and will not be counted towards the indicative housing allowance.</p> <p>The village assessments are based on high level Information. With regard to flood risk, including surface water flooding, is taken from the SFRA 2017/ 2018 [Examination ref. G5]. The report records Rose Farm Barn and Market Street, Tunstead, as one of the areas that</p>

	<p>has experienced surface water flooding events due to a heavy rainfall where the capacity of the local drainage system was exceeded and where the foul sewer was also overloaded (2013). The surface water flooding/ foul water information contained in this response, as well as that detailed in the planning application PF/24/0665 highlight them as ongoing considerations at the planning application stage, but ones that should not require the designation of Tunstead as an environmentally 'Constrained Small Growth Village'. As with other SGVs, the Council would continue to liaise with Norfolk CC, as the LLFA and Highway Authority, and Anglian Water to ensure that such matters are taken into account as part of any planning application consultation. For information Anglian Water consultation feedback confirms that Tunstead has available dry weather flow headroom to accommodate additional wastewater flows within the Belaugh WRC catchment.</p> <p>It is noted that the parish is undertaking a Neighbourhood Plan (NP) for Tunstead and Sco Ruston. The proposed indicative housing allowance for Tunstead can be used as an appropriate target in order to identify suitable allocations within the NP to meet the housing need. It is understood that AECOM have been commissioned through the NP process to undertake a Housing Needs Assessment (HNA) and the Council has provided data for consideration and information about the emerging changes in strategic policy. The data provided shows that 43 dwellings have been built over the last 20 years. This is comparable with the proposed indicative housing allowance of 42 dwelling over the Plan period. The Council has not been provided with a copy of the emerging HNA evidence, however its anticipated that this will only provide a housing need figure for the Neighbourhood Area taking into consideration the existing planning permissions. It should be noted that the parish council is required to agree a housing target figure with the Council in line with NP guidance. The Council is required to plan for the wider strategic housing needs of the district and as a proposed SGV, Tunstead will assist with the delivery of this wider need. The NP can go a long way in developing suitable local additional considerations.</p> <p>No modification proposed.</p>
Section	Supporting Document: Appendix 2 - Distribution of Growth (Small Growth Villages) Addendum
ID	FC137
Response Date	05/12/2024 12:08:00
Full Name	Mr Paul Godfrey
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	I wish to note my objection to Langham being proposed as a small growth village on the grounds the desk top study by NNDC has not been adequately considered, out of the 7 plots noted additional, only 2 are realistic achievable. There are also considerable environmental constraints and infrastructure issues. Majority of the sites are in an AONB and the village doesn't have the range of essential services listed in the documentation. I believe further dialogue with the parish council and parishioners is required before ant decision to include the village as a small growth village in the local plan
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	Object: Objection to Langham being included as a SGV based on the desktop study, which is inadequate in that of the 7 plots noted, only 2 are achievable and where the majority of the sites are in the AONB (Norfolk Coast National Landscape). Langham has considerable environmental and infrastructure constraints and the village doesn't have the range of essential services listed. Further discussion with the Parish Council and residents is required before a decision to include the village as a SGV is made.
Officer Response	Disagree: The 7 plots referred to in Langham by the respondent relate to the proposed 7 revisions to the settlement boundary of Langham detailed in the Addendum to Background Paper 11: Settlement Boundary Review (SGVs) – see paragraph 2.6 and associated settlement boundary map in Appendix 1 of the document, (provided at Appendix 3 of the consultation).

	<p>Under Policy SS1 Spatial Strategy, SGVs do not have site allocations, but instead have an indicative housing allowance where a site can come forward provided a proposal satisfies the requirements in criteria 3 of the policy. The revised requirements, as suggested by the Planning Inspector, for 1 key service and 3 secondary/ desirable services is met for Langham, having a primary school, pub, village hall and place of worship.</p> <p>The Inspector has been clear in his letter of 30 August 2024 [Examination ref. EH006(h)] at paragraph 7, that the Plan is 'capable of being found sound with limited additional work to address soundness issues, but that additional work should be progressed at pace.' Given the timeframe, the public consultation provides the opportunity for all interested parties including statutory consultees and parish and town councils to provide feedback on the further consultation proposals set out.</p>
Section	Supporting Document: Appendix 2 - Distribution of Growth (Small Growth Villages) Addendum
ID	FC289
Response Date	16/12/2024 12:31:43
Full Name	Mr Alan Smith
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>In the Table, concerning the settlement of Langham, following Paragraph 3.10 in this particular Supporting document, please note the following points :</p> <p>1) In the section headed as "Built Environment", please be aware of the omission of the presence / location of the relevant Scheduled Ancient Monument here. That is, the comparable entry in the Examination Library Document Ref. C2, entitled "Background Paper 2, Distribution of Growth", Publication stage Regulation 19, January 2022, updated May 2023, Submission Stage, on Page 143, states that "In addition, there is one Scheduled Ancient Monument, situated approximately 1.3 km to the west of the village centre.". This fact has now been completely omitted from this current Supporting Document Ref. FC003, dated November 2024.</p> <p>2) In the section headed as "Infrastructure Constraints", it is currently stated that there are "No known constraints." However, in contrast to this latest assessment, please now note the following items :</p> <p>2a) In the comparable entry in the Examination Library Document Ref. C2, entitled "Background Paper 2, Distribution of Growth", Publication stage Regulation 19, January 2022, updated May 2023, Submission Stage, on Page 145, it states that there is "No spare capacity at Langham Village School." Therefore, in respect of the latest assessment of the settlement of Langham, please note the following list of pertinent Infrastructure Constraints :</p> <ul style="list-style-type: none"> • The lack of any spare capacity at the village Primary School. • The absence of any easy or practical access to suitable medical provision locally. • Limited public transport links. • Lack of relevant capacity at the local Sewage Treatment Plant. • Carrying capacity of the local rural roads network. • Increased dangers from any raised levels of local traffic numbers, traffic movements and the related increase in rural speeding frequency. <p>3) In the section headed as "Conclusion", Langham does not in fact fully and truly meet the latest set of assessment criteria in order to be categorised as a new Small Growth Village location. There is a lack of local services and community provisions, there are too many basic Infrastructure Constraints, and, therefore, the settlement of Langham should continue to be classified as being in the Countryside Policy Area instead.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	In order to present the actual 'on-the-ground' / 'day-to-day' reality of the situation in the settlement of Langham so as to be able to support the response position that it is not at all a suitable location to be considered for categorisation as a new "Small Growth Village" site area.
Include files	
Officer Summary	Object: Respondent highlights differences between information for Langham's village assessment in the Distribution of Growth Background Paper 2 [Examination ref. C2] and the

	<p>Distribution of Growth Background Paper (SGVs) Addendum [Examination ref. FC002] listed as Appendix 2 of the Further Consultation, which relate to 1) an omission in the Built Environment section of a previous reference to a Scheduled Ancient Monument located approximately 1.3 km to the west of the village; and 2) an omission in the Infrastructure section of a previous reference to 'the lack of any spare capacity at the village Primary School.'</p> <p>These should be noted and additional Infrastructure constraints added as follows: The absence of any easy or practical access to suitable medical provision locally; Limited public transport links; Lack of relevant capacity at the local Sewage Treatment Plant; Carrying capacity of the local rural roads network; Increased dangers from any raised levels of local traffic numbers, traffic movements and the related increase in rural speeding frequency.</p> <p>In the Conclusion section, it does not state that there is a lack of local services and community provisions, and basic Infrastructure Constraints, and, therefore, the settlement of Langham should continue to be classified as being in the Countryside Policy Area instead.</p>
Officer Response	<p>Noted and disagree: The two differences in information highlighted between the Langham village assessments contained within the Distribution of Growth Background Paper 2 [Examination ref. C2] and the Distribution of Growth Background Paper (SGVs) Addendum [Examination ref. FC002] are noted. Alongside the other constraints listed (unevidenced), they do not change the overall conclusion that Langham is identified as a SGV using the revised methodology, which has been consistently applied and will allow for small scale growth to support the vitality of rural communities in accordance with the NPPF.</p>
Section	Supporting Document: Appendix 2 - Distribution of Growth (Small Growth Villages) Addendum
ID	FC341
Response Date	17/12/2024 17:39:00
Full Name	Sir Richard Gozney
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Not really. Langham's sole primary criterion for Small Growth Village status, Langham Primary School, is full. The Education Authority has refused funds for extra buildings. Assuming an influx of children to Langham would be given priority for places they would displace other children from the wider catchment area.</p> <p>Nor is the proposal effective: internet capacity is already stretched, the village's narrow roads are already too busy at school drop off and collection times and in summer with visitors driving daily to the coast, and the village has concerns about Anglia Water's capacity for more clean water and its ability to remedy drainage issues.</p> <p>The proposal is not justified given the lack of school places, the fulfillment of no other primary criterion for Small Growth Village status, stretched infrastructure and little public transport.</p> <p>The proposal is likely to breach national policy when developers with planning permission claim the high price of building land, whether within or adjacent to the present village boundary, makes affordable housing not financially viable for them. As recently in North Norfolk, in Holt and elsewhere.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	A proper consideration of the options for the North Norfolk Local Plan to meet the District's housing is needed to debate and prioritise between villages as well as the other suggestions in the revised Draft.
Include files	
Officer Summary	<p>Object: Langham's sole primary criterion for Small Growth Village status, Langham Primary School, is full. The Education Authority has refused funds for extra buildings and an influx of children to Langham would be given priority for places displacing other children from the wider catchment area.</p> <p>The proposal is not effective as internet capacity is already stretched, the village's narrow roads are already too busy and the village has</p>

	<p>concerns about the capacity for more clean water and the ability to remedy drainage issues.</p> <p>The proposal is not justified given the lack of school places, the fulfilment of no other primary criterion for Small Growth Village status, stretched infrastructure and little public transport. The proposal is likely to breach national policy when developers with planning permission claim the high price of building land, making affordable housing not financially viable for them, as has happened in Holt and elsewhere.</p>
Officer Response	<p>Disagree: Langham has been assessed against the revised methodology as having one key service and three secondary or desirable services, concluding that it meets the criteria to be identified as a SGV, with an indicative housing allowance of 15 dwellings. The assessment acknowledges the moderate environmental constraints associated with the village, including that the northern part of the village sits within the Norfolk Coast National Landscape (AONB) and that the southern part is adjacent to the designation, but this, in combination would not prevent the opportunity for small scale development within the village. The comments regarding infrastructure are matters that would be assessed in detail at the planning application stage alongside all other material considerations.</p>
Section	Supporting Document: Appendix 2 - Distribution of Growth (Small Growth Villages) Addendum
ID	FC378
Response Date	18/12/2024 20:30:42
Full Name	Mr Christopher Hey
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>The assessment of services for Stibbard should be revised to designate the Ordnance Arms pub/restaurant as a 'Remote' service for the village because of its distance from the settlement and the lack of safe access to it by sustainable means. As a 'Remote' service it should not be included in the service tally for the village. The proposal to include Stibbard in the Small Growth Village list cannot be justified given the incorrect assessment of this service.</p> <p>The detailed case is in a separate document attached.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	NNDC Local Plan consultation CHey attachment 181224.docx
Officer Summary	<p>Object: The assessment of services for Stibbard should be revised to designate the Ordnance Arms pub/restaurant as a 'Remote' service for the village because of its distance from the settlement and the lack of safe access to it by sustainable means. If it were not counted, Stibbard would not meet the requisite new threshold of 1 key service and 3 secondary/desirable services. The assessment for Stibbard does not note the considerable distance from the settlement boundary to the Ordnance Arms which is approximately 1.2 miles from the village centre via unclassified single track roads.</p> <p>Given the distance and that the restaurant is not reasonably and safely accessible from the village other than by car, it should be recorded as remote and withdrawn from the list of services and consequently, Stibbard should also be withdrawn from the SGV classification.</p>
Officer Response	<p>Disagree: The villages that were recorded in Background Paper 2 Distribution of Growth [Examination ref. C2] as having one key service and three secondary/desirable services were reviewed as part of the Further Consultation proposals and the details for Stibbard are included within the Addendum this Background Paper (SGVs).</p>

	It is acknowledged that a number of SGVs, including Stibbard, have services and facilities outside the identified settlement boundary. As a high-level assessment, the distance and accessibility to the services and facilities is not recorded in detail, particularly as the rural nature of the roads and lack of footpaths applies to the majority of the SGVs and as such, does not automatically discount them from designation. In terms of the consistency of the assessments, a service or facility was discounted where it was, for example, located in an adjacent hamlet, which was considered to be physically remote from the village being assessed.
Section	Supporting Document: Appendix 2 - Distribution of Growth (Small Growth Villages) Addendum
ID	FC422
Response Date	18/12/2024 22:12:08
Full Name	Ms Hannah Gent
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>MUN03/A is not included in Appendix 2.</p> <p>Mundesley Medical Centre will need to increase its capacity.</p> <p>Inadequate dentist services in surrounding areas.</p> <p>Additional traffic due to insufficient local services.</p> <p>Inadequate parking in the village - there are already safety issues regarding parking especially in the summer months. There was recently a public review to increase yellow lines in the village.</p> <p>Flooding along and down Church Lane in heavy rain already which does not disperse due to inadequate drainage.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	General comments: MUN03/A is not included in Appendix 2. Mundesley Medical Centre will need to increase its capacity and there is inadequate dentist services in surrounding areas. Additional traffic due to insufficient local services and inadequate parking in the village. There are already safety issues regarding parking especially in the summer months. There was recently a public review to increase yellow lines in the village. Flooding along and down Church Lane in heavy rain already which does not disperse due to inadequate drainage.
Officer Response	General comment: Mundesley is an identified Large Growth Village within Policy SS1 Spatial Strategy. Appendix 2 relates to proposed additional Small Growth Villages, where sites are not allocated for this tier of the settlement hierarchy. Therefore, the proposed site extension MUN03/A does not appear in Appendix 2, but its assessment can be found in Appendix 1 Additional Sites Review Background Paper and also within the Site Assessment Booklet Regulation 19): Mundesley [examination ref. D12].
Section	Supporting Document: Appendix 2 - Distribution of Growth (Small Growth Villages) Addendum
ID	FC459
Response Date	19/12/2024 11:54:00
Full Name	Chris Weston
Organisation	Ryburgh Parish Council
Agent Full Name	
Agent Organisation	

<p>Does the Proposed Change contribute to the overall soundness of the Plan?</p>	<p>Appendix 2 (Gt Ryburgh)</p> <p>Ryburgh PC have read with interest the rationale for the proposed amendment and note that it is recognised that the village meets the criteria of a Small Growth Village. It is agreed that some degree of small scale development is desirable within the current confines of the settlement boundary. This is also recorded in the Ryburgh Neighbourhood Plan. This inevitably calls for in-fill construction only, rather than extending the village. The village is bounded by the River Wensum Speacial Area of Conservatin, which further limits expansion and development, especially as run off is already a growing issue.</p> <p>Ryburgh PC also ote that the issue of congestion has not been addressed for any village conatned in App 2. Ryburgh has numerous articulated lorries transiting to the centre of the village every working day.</p> <p>We welcome the emphasis towards larger family homes (3 & 4 bed) and are also aware of some existing buildings outside the settlement boundary that could, if sympathetically renovated, would both preserve the character of the Upper Wensum Valley, and provide suitable additional accomodation. Whilst Gt Ryburgh has the benefit of a natural gas supply, unlike many settlements in the locality it is only capable of supporting small pockets of new build housing as cited in the proposal.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	<p>Yes</p>
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	<p>To rovide additional context, and challenge if necessary any conclusions reached by the Inspector following this submission.</p>
<p>Include files</p>	
<p>Officer Summary</p>	<p>General comments: Ryburgh PC notes that it is recognised that the village meets the criteria as a Small Growth Village. It is agreed that some degree of small scale development is desirable within the confines of the settlement boundary, as recorded in the Ryburgh Neighbourhood Plan, which calls for in-fill construction only, rather than extending the village. The village is bounded by the River Wensum SAC, which further limits expansion and development, especially as run off is already a growing issue.</p> <p>Ryburgh PC also notes that the issue of congestion has not been addressed for any village contained in Appendix 2. Ryburgh has numerous articulated lorries transiting to the centre of the village every working day.</p> <p>We welcome the emphasis towards larger family homes (3 & 4 bed) and are aware of some existing buildings outside the settlement boundary that could be sympathetically renovated to both preserve the character of the Upper Wensum Valley, and provide suitable additional accommodation. Whilst Great Ryburgh has the benefit of a natural gas supply, it is only capable of supporting small pockets of new build housing, as cited in the proposal.</p>
<p>Officer Response</p>	<p>Comments are noted.</p> <p>For information, Norfolk County Council Highways Authority has no objection to the increase in the number of Small Growth villages as listed under Proposed Change 12.</p>

Supporting Document: Appendix 3 - Settlement Boundary Review (Small Growth Villages) Addendum

Section	Supporting Document: Appendix 3 - Settlement Boundary Review (Small Growth Villages) Addendum
ID	FC168
Response Date	08/12/2024 10:24:39
Full Name	Dr John Bacon
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>I refer to the Settlement Boundary Review for Worstead. There seems to be no logic to your proposed extension into areas of land only in the centre of the village. WOR.01 includes an area already fully developed - you have included our village Hall and its car park, which as one of our only two village features should remain. WOR.02 is a plot of land on very low, wet ground where planning has previously been considered and rejected on these grounds. At present an Anglian Water sewerage pumping station occupies this land.</p> <p>Worstead is a large village encompassing several surrounding Hamlets, (Withergate, Bengate, Briggate, Meeting Hill) There must be suitable areas in these parts of the village also but these have not been considered for any Settlement Boundary review.</p> <p>Land on Station Road (Photo-plan attached) has been derelict for many years, in desperate need of rejuvenation, the village would welcome development there.</p> <p>I think the village accepts that development must occur but the process for <i>whereit</i> should occur should be an inclusive process.</p> <p>Your review doesn't make much sense and more suitable areas for development could be identified.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	worstead potential development area.png
Officer Summary	<p>Object: The review doesn't make sense as the areas highlighted in the Settlement Boundary Review for Worstead are already developed, and include the village hall and car park, which should remain. Worstead is a large village encompassing several surrounding hamlets, where there must be suitable areas for development but which have not been considered as part of the settlement boundary review.</p> <p>The attached photo highlights a site at Station Road that has been derelict for many years and could be redeveloped. Although the principle of development could be accepted by the village, the process of where this should be located needs to be an inclusive one.</p>
Officer Response	<p>Disagree: The 2 areas referred to in Worstead relate to the proposed 2 revisions to the settlement boundary of the village detailed in the Addendum to Background Paper 11: Settlement Boundary Review (SGVs) – see paragraph 2.11 and associated settlement boundary map in Appendix 1 of the document, (provided at Appendix 3 of the consultation). The 2 areas do not relate to proposed site allocations. Under Policy SS1 Spatial Strategy, SGVs do not have site allocations, but instead have an indicative housing allowance where a site can come forward provided a proposal satisfies the requirements in criteria 3 of the policy. The area of land shown in the attached document would not meet the requirements set out for SGV development within criteria 3 of Policy SS1, as it does not immediately abut the proposed settlement boundary for Worstead, but it could be developed in line with the options available in Policy SS2 Development in the Countryside.</p> <p>The Addendum to Background Paper 11: Settlement Boundary Review (SGVs) sets out the methodology for the settlement boundary review at paragraphs 1.12 – 1.14. In the case of Worstead, the review started with consideration of the Local Plan 1998 settlement boundary and reviewed that boundary against the methodology criteria, culminating in 2 proposed amendments listed as WOR.01 and WOR.02.</p>

	The Inspector has been clear in his letter of 30 August 2024 [Examination ref. EH006(h)] at paragraph 7, that the Plan is 'capable of being found sound with limited additional work to address soundness issues, but that additional work should be progressed at pace.' Given the timeframe, the public consultation provides the opportunity for all interested parties including statutory consultees, parish and town councils and individuals to provide feedback on the further consultation proposals set out.
Section	Supporting Document: Appendix 3 - Settlement Boundary Review (Small Growth Villages) Addendum
ID	FC291
Response Date	16/12/2024 12:46:04
Full Name	Mr Alan Smith
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Please note that, with reference to the Table shown in Section 2.6 of this particular document, relating to the settlement of Langham, and with reference to its corresponding linked Settlement Boundary Review Map, as included in Appendix 1 of this same document, there is a factual error, as follows :</p> <ul style="list-style-type: none"> In the Table, under the "Comment" column heading, the entry text for the Comments made therein listed against the area of Site Reference LAN.01 actually refer to the area of Site Reference LAN.06 (as depicted on the corresponding Map).
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	In order to represent the actual situation 'on-the-ground' here in Langham and to demonstrate why a small rural village, with both very limited 'in-house' community services and restricted access to any wider service provisions, should NOT be considered for inclusion in any classification of new "Small Growth Village" locations.
Include files	
Officer Summary	Comment: In the Table shown in section 2.6 with regard to Langham, under the entry text for the Comments made therein listed against the area of Site Reference LAN.01 actually refer to the area of Site Reference LAN.06 (as depicted on the corresponding Map).
Officer Response	Agree: within Table at 2.6 within Settlement Boundary Review (SGVs) Addendum (Appendix 3) is noted and accepted. The text should read as follows in the Table at 2.6: LAN.01 C, D Amend boundary to incorporate existing dwellings and their curtilages LAN.06 C, D Amend boundary to incorporate existing dwellings and their curtilages. To reflect permitted change of use of land from agricultural to garden from 1 The Green to 25 Holt Road (PF/01/0671).
Section	Supporting Document: Appendix 3 - Settlement Boundary Review (Small Growth Villages) Addendum
ID	FC391
Response Date	18/12/2024 14:45:00
Full Name	Simon Pegg
Organisation	
Agent Full Name	Simon Pegg
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILE The allocations in Langham, as shown on the proposed Settlement Boundary Map in Appendix 3, identify areas which are poorly served by Highway access, in particular ref: LAN.02, LAN.04 and LAN.06, and development proposals in these locations will necessitate additional infrastructure to allow access. T

	<p>There is an option on a section of land, immediately south of 'Orchard House' (identified on the same reference map) which has direct link to the Highway, and is adjacent to where the suggested settlement boundary line is. The land in question is within single ownership, and as part of the same (single) title associated with Orchard House, so is available, and is within a Flood Zone 1 risk area, suitable for development, and has screening which can be retained, in whole or part, via mature landscaping/treeline that would help preserve character of village through potential development.</p> <p>The suggested development line has, effectively, split the single title ownership of Orchard House to have part in a development site, and part outside.</p> <p>This section of land associated with Orchard House would offer an area of land comparable in size with either LAN.04 or LAN.06, and is larger than LAN.02, and it has direct access to Highways, and increased potential for landscaping and screening, and reducing central village density of development.</p> <p>The owner of Orchard House is happy to have the section of land considered for development, as appropriate.</p> <p>A single annotated map section is attached to identify the land in question.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	screen copy image langham.jpg
Officer Summary	<p>General comments: The allocations in Langham, as shown on the proposed Settlement Boundary Map in Appendix 3, identify areas which are poorly served by Highway access, in particular ref: LAN.02, LAN.04 and LAN.06, and development proposals in these locations will necessitate additional infrastructure to allow access.</p> <p>Identification of land adjacent to Orchard House as being a suitable sized site, adjacent to the settlement boundary, in single ownership, direct access to the highway and in Flood Zone 1. The suggested development line has split the single title ownership of Orchard House to be partly in the site and partly outside.</p>
Officer Response	<p>Disagree: The areas referred to in Langham relate to the proposed revisions to the settlement boundary of the village detailed in the Addendum to Background Paper 11: Settlement Boundary Review (SGVs) – see paragraph 2.6 and associated settlement boundary map in Appendix 1 of the document, (provided at Appendix 3 of the consultation). The areas do not relate to proposed site allocations and do not follow ownership boundaries. Under Policy SS1 Spatial Strategy, SGVs do not have site allocations, but instead have an indicative housing allowance where a site can come forward provided a proposal satisfies the requirements in criteria 3 of the policy.</p> <p>For information, the area of land identified at Orchard House (in the attached document) would meet the locational requirement set out for SGV development within criteria 3 of Policy SS1, as it immediately abuts the proposed settlement boundary for Langham.</p>
Section	Supporting Document: Appendix 3 - Settlement Boundary Review (Small Growth Villages) Addendum
ID	FC487
Response Date	18/12/2024 17:59:00
Full Name	James Brooke
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILE</p> <p>We represent that land owner whose ownership includes that land hatched on the southern edge of the village of Northrepps.</p> <p>We note the comments made by the David Reed the Inspector with regard to the Small Growth Village Policy in his letter of the 24th May 2024.</p> <p>Following the recent and successful development of land by Broadland Housing Group to the north of the village we consider that the land shown hatched to the south and adjacent</p>

	<p>to the Church could be suitable for a mixed housing scheme to further provide for local housing demands, recreational space for the village, parking for the Church and a landscaping scheme to soften the southern boundary of the village.</p> <p>We would be pleased to provide a layout and to meet with the Council to consider this opportunity further.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	SKM_C250i24121910190.pdf
Officer Summary	<p>General comment: representing land owner of land identified on southern side of Northrepps (attached document) adjacent to Church Lane.</p> <p>Following successful development of land on north side of village by Broadland Housing Group, consider land to south could be suitable for a mixed housing scheme to provide further local housing, recreational space for village, parking for church and landscaping scheme to southern boundary of site. Proposes provision of layout and discussion/consideration with the Council.</p>
Officer Response	<p>General comment: Northrepps is proposed as one of the additional SGVs, with an indicative housing allowance of 43 dwellings (at 9% growth). The approach to SGVs does not allocate sites, but instead proposals will need to meet the requirements of criteria 3 of Policy SS1. As such, the submission's identification of land on the south side of Northrepps is not relevant to the consultation.</p>
Section	Supporting Document: Appendix 3 - Settlement Boundary Review (Small Growth Villages) Addendum
ID	FC491
Response Date	18/12/2024 13:06:00
Full Name	
Organisation	Glavenhill Strategic Land
Agent Full Name	Mr Philip Atkinson
Agent Organisation	Director Lanpro Services
Does the Proposed Change contribute to the overall soundness of the Plan?	My client does however objects the settlement boundary changes proposed in the Background Paper despite the changes being arrived at based on an "agreed methodology" the changes are poorly devised and ineffective and in the majority of cases will do nothing to increase the recycling of land and new windfall housing delivery in the Small Growth Villages.
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	My client would respectfully request that we are able to attend the reconvened Examination in Public to discuss the matters raised in this representation in respect of Badersfield (Scottow).
Include files	
Officer Summary	Object: objects to the settlement boundary changes proposed in the Background Paper, which are poorly devised and ineffective which, in the majority of cases, will do nothing to increase the recycling of land and new windfall delivery in the SGVs.
Officer Response	Disagree: The response does not provide any detailed objection to the Addendum to Background Paper 11: Settlement Boundary Review

(SGVs), which sets out the methodology at paragraphs 1.12 – 1.14. The methodology has been consistently applied to all the SGVs in forming their settlement boundaries.

Under Policy SS1 Spatial Strategy, SGVs do not have site allocations, but instead have an indicative housing allowance where a site can come forward provided a proposal satisfies the requirements in criteria 3 of the policy, including a locational requirement that the prospective area of land immediately abuts the proposed settlement boundary.

The matter of infill development was discussed at the examination hearings and the Inspector concluded in his Initial Findings letter [Examination ref. EH006(f)] at paragraph 43, that under Policy SS1 criterion 2, windfall sites in the Small Growth Villages will now count towards a separate total (and not the indicative housing allowance).

Section	Supporting Document: Appendix 3 - Settlement Boundary Review (Small Growth Villages) Addendum
ID	FC494
Response Date	18/12/2024 13:03:00
Full Name	
Organisation	Glavenhill Strategic Land
Agent Full Name	Mr Philip Atkinson
Agent Organisation	Director Lanpro Services
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILES</p> <p>My client specifically contends that the proposed settlement boundary for the Small Growth Village of Langham is drawn too tight and the suggested boundaries for Langham and other villages as proposed. The amendments being sought are entirely appropriate and represent a clear opportunity to accommodate new planned and/or windfall housing development in Langham as a sustainable location for new housing growth. The clear and obvious windfall site off North Street in the centre of the village (shown outlined in red in Figure 1 below) [SEE ATTACHED FILE] can be delivered immediately provided the settlement boundary for Langham is amended as suggested. The immediacy of delivery by Glavenhill is also a relevant factor in assessing whether the suggested amendment should be made at this late stage.</p> <p>My client objects to the settlement boundary changes for Langham proposed in the Background Paper as despite the changes being arrived at based on an "...agreed methodology..." and the re-introduction of settlement boundaries devised in 1998 (and amended very slightly) the changes proposed are certainly ineffective in terms of the recycling of land and in all cases will do nothing to increase the rate of new windfall housing delivery in this sustainable growth village. To explain the Council proposes 7 changes to the 1998 settlement boundary for the village of Langham (to incorporate gardens relating to existing dwellings in all cases) and it is certain to Glavenhill that no single change proposed will actually deliver any new housing in the village as explained below:</p> <ul style="list-style-type: none"> • Change LAN01 – the site that is now included contains mature trees of townscape merit around its perimeter and any access would be very close to the North Street junction with Wiveton Road; • Change LAN02 – the site now include cannot be accessed by vehicles as it is to the rear of the Primary School and its associated play area; • Change LAN03 – the site now included is not large enough to retain the existing garden and accommodate a new dwelling with its associated garden; • Change LAN04 – the site now included is landlocked with no vehicular access; • Change LAN05 – the site now included cannot achieve a safe vehicular access; • Change LAN06 – the site now included contains multiple garden spaces under multiple ownerships and has no vehicular access; and • Change LAN07 – contains a number of newly converted and constructed dwellings that will not be redeveloped within the emerging Plan period. <p>As such none of the 1998 settlement boundary changes as proposed to be amended will actually encourage windfall housing delivery within Langham. In this respect the recently published new National Planning Policy Framework states under paragraph 73 that "...support</p>

the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes.”

The boundary changes to the settlement boundary for the Small Growth Village of Beeston Regis are even more difficult to comprehend as the settlement boundary has been altered to incorporate a statutory undertakers sub-station and compound and the site of a single dwelling which is impossible to redevelop as its accessed off a private layby with heavily restricted vision splays onto Cromer Road.

As such Glavenhill would argue that there is little point making any of the settlement boundary changes proposed for Langham and Beeston Regis (regardless of whether the methodology has been previously agreed) to encourage sustainable windfall development opportunities in the Small Growth Villages as very few of the changes being suggested create ‘real’ opportunities for land to be recycled and re-used.

As an alternative my client would suggest and support an additional / alternative change to the 1998 settlement boundary proposed for Langham that broadly accords with criteria (h) of the published settlement boundary criteria as shown outlined in red on Figure 1 below **[SEE ATTACHED FILE]**.

This existing site is a clear and obvious windfall opportunity that is currently open grazing land bounded on all sides by existing built development in the centre of the village of Langham. The photograph that is Figure 2 below **[SEE ATTACHED FILE]** shows the clear opportunity and the context.

To this end my client notes the “agreed criteria” for settlement boundary changes as contained in paragraph 1.13 of the Addendum to Background Paper 11: Settlement Boundary Review (Small Growth Villages) dated November 2024 that states:

“In applying the above approach, the following detailed criteria has been applied:

Criteria for inclusion within a boundary:

- a) Existing commitments for built development (i.e. planning permissions);
- b) Existing housing and mixed-use allocations within the Local Plan with the exception of those judged unlikely to be built;
- c) Curtilages of dwellings unless functionally separate to the dwelling or where the land has the capacity to significantly extend the built form of the settlement beyond what is considered to be appropriate;
- d) Properties which can be considered to be an integral part of the settlement (e.g. houses which are separated from adjacent properties by only very narrow gaps and are functionally and visually related to the urban area);
- e) In relation to farmyards and associated building, as a general rule only farmhouses and closely associated outbuildings on a settlement street frontage are included;
- f) School buildings;
- g) Adjoining small scale brownfield sites;
- h) Recreational or amenity open space, which is physically surrounded by the settlement or adjoined on three sides by the settlement;
- i) Doctor Surgeries.

Criteria for exclusion from a boundary:

- j) Existing Local Plan allocations which are now judged unlikely to be built.
- k) Areas of land which do not fit into the above categories, but which are presently included in the settlement boundary.”

My client therefore suggests the inclusion of a further criteria (or indeed an amendment to criteria (h)) that allows for the inclusion of this further windfall site in Langham (and indeed other sustainably located sites in Small Growth Villages) where built development exists along each boundary of any open site within the established centre of a Small Growth Village. Such an approach as suggested by Glavenhill is entirely logical and in the case of Langham would deliver 30 no. new and sustainable housing growth in Langham that would go some way to de-risking the massive over-reliance on increased housing delivery in North Walsham.

The attached Sketch Layout Scheme drawing (marked draft for internal discussion and now formally submitted to the Examination for detailed consideration) **[SEE ATTACHED FILE]** shows how this minor change to the 1998 settlement boundary at Langham could actually deliver an additional 30 no. provide and affordable dwellings.

This additional sustainable windfall site is controlled by Glavenhill and as such is immediately deliverable to meet increased housing targets. The proposed settlement boundary change for Langham as detailed on the Sketch Layout Scheme will also certainly deliver the following benefits for the village:

- New village shop (that could also be used as a Post Office subject to identifying an operator);
- New village green (with relating parking and potentially also play equipment) containing a large community orchard;

	<ul style="list-style-type: none"> • Additional off-street car parking (potential over-flow for the village hall and The Harper hotel) and new safe drop-off facilities for the Primary School; • A new pedestrian footpath connecting existing development to the west (St Andrews Drift) with North Street to improve pedestrian safety (in combination with a new 20mph speed limit) along Binham Road; • Extended new public footway and crossing point to the Primary School along North Street; and • Private and affordable housing at an appropriate size and scale to meet local needs. <p>As stated in the Addendum to Background Paper 2: Distribution of Growth (Small Growth Villages) "...as at 15th August 2024, 690 people on the housing waiting list expressed a preference to live in Langham..." and this site inclusion in the settlement boundary would go a long way to meeting the existing severe private and chronic confirmed affordable housing needs within Langham.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	<p>Yes</p>
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	<p>My client would like to attend the reconvened Examination in Public to discuss all the matters raised in this letter in respect of windfall development in Langham.</p>
<p>Include files</p>	<p>Langham reps Glavenhill NNDC Local Plan focused changes 18 12 24.pdf Sketch Layout Scheme 2(B)_071123JR.pdf</p>
<p>Officer Summary</p>	<p>Object: contends that the proposed settlement boundary for the Small Growth Village of Langham is drawn too tight and the suggested boundaries for Langham and other villages as proposed. The clear and obvious windfall site off North Street in the centre of the village (shown outlined in red in Figure 1 of attached file) can be delivered immediately provided the settlement boundary for Langham is amended as suggested.</p> <p>My client objects to the settlement boundary changes for Langham proposed in the Background Paper as despite the changes being arrived at based on an "...agreed methodology..." and the re-introduction of settlement boundaries devised in 1998 (and amended very slightly) the changes proposed are certainly ineffective in terms of the recycling of land and in all cases will do nothing to increase the rate of new windfall housing delivery in this sustainable growth village. To explain the Council proposes 7 changes to the 1998 settlement boundary for the village of Langham (to incorporate gardens relating to existing dwellings in all cases) and it is certain to Glavenhill that no single change proposed will actually deliver any new housing in the village.</p> <p>In this respect the recently published new NPPF states under paragraph 73 that "...support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes."</p> <p>The boundary changes to Beeston Regis are even more difficult to comprehend as the settlement boundary has been altered to incorporate a statutory undertakers sub-station and compound and the site of a single dwelling which is impossible to redevelop as its accessed off a private layby with heavily restricted vision splays onto Cromer Road.</p> <p>As such Glavenhill would argue that there is little point making any of the settlement boundary changes proposed for Langham and Beeston Regis (regardless of whether the methodology has been previously agreed) to encourage sustainable windfall development opportunities in the Small Growth Villages as very few of the changes being suggested create 'real' opportunities for land to be recycled and re-used.</p> <p>As an alternative my client would suggest and support an additional / alternative change to the 1998 settlement boundary proposed for Langham that broadly accords with criteria (h) of the published settlement boundary criteria as shown outlined in red on Figure 1 below [SEE ATTACHED FILE]. This existing site is a clear and obvious windfall opportunity that is currently open grazing land bounded on all sides by existing built development in the centre of the village of Langham. The photograph that is Figure 2 below [SEE ATTACHED FILE] shows the clear opportunity and the context.</p> <p>My client therefore suggests the inclusion of a further criteria (or indeed an amendment to criteria (h)) that allows for the inclusion of this further windfall site in Langham (and indeed other sustainably located sites in Small Growth Villages) where built development exists along each boundary of any open site within the established centre of a Small Growth Village. Such an approach as suggested by Glavenhill is entirely logical and in the case of Langham would deliver 30 no. new and sustainable housing growth in Langham that would go some way to de-risking the massive over-reliance on increased housing delivery in North Walsham. The Sketch Layout Scheme will also deliver other benefits for the village: new village shop (that could also be used as a Post Office subject to identifying an operator); new village green (with relating parking and potentially also play equipment) containing a large community</p>

	<p>orchard; additional off-street car parking (potential over-flow for the village hall and The Harper hotel) and new safe drop-off facilities for the Primary School; a new pedestrian footpath connecting existing development to the west (St Andrews Drift) with North Street to improve pedestrian safety (in combination with a new 20mph speed limit) along Binham Road; extended new public footway and crossing point to the Primary School along North Street; and private and affordable housing at an appropriate size and scale to meet local needs.</p> <p>This site inclusion in the settlement boundary would go a long way to meeting the existing severe private and chronic confirmed affordable housing needs within Langham</p>
<p>Officer Response</p>	<p>Disagree: The Addendum to Background Paper 11: Settlement Boundary Review (Small Growth Villages) [Examination ref. FC004] follows the same approach as that set out in the original settlement boundary review paper [examination ref. C11], where the purpose of a settlement boundary is stated in both documents as being a policy tool that establishes and contains built up areas where there is a presumption in favour of development within the boundary, subject to compliance with other relevant local plan policies. The proposed revisions for each SGV including Langham satisfy atleast one of the criteria within the methodology. The identification of the settlement boundary does not relate provide for the inclusion of any other land, for example, greenfield land, purely for the purposes of potential windfall development. The methodology has been applied consistently and has already been examined through the earlier hearings in 2024.</p> <p>The area of land being promoted to be within the settlement boundary for windfall development is agricultural/ grazing land, which does not satisfy any of the criteria contained within the methodology (para. 1.13 of the Addendum). The land is located immediately adjacent to the revised settlement boundary for Langham, which would be appropriate in principle for development under criteria 3 of Policy SS1. Langham has an indicative housing allowance of 15 dwellings at 9% growth.</p>

Supporting Document: Appendix 4 - Gypsy, Traveller & Travelling Showpeople Accommodation Needs Assessment (2024)

Section	Supporting Document: Appendix 4 - Gypsy, Traveller & Travelling Showpeople Accommodation Needs Assessment (2024)
ID	FC423
Response Date	18/12/2024 22:33:58
Full Name	Ms Hannah Gent
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Surface flooding outside 2 Church Lane due to inadequate drainage.</p> <p>Negative sustainability appraisal score on SA1, SA6, SA8 and SA9.</p> <p>SA8 - A new development at this site would not enhance the local area and would have a negative impact on the wildlife (foxes, badgers, muntjacs, green woodpeckers and buzzards) which lives in the bank on the western side of the development.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	<p>General comments: (comments appear to refer to the Sustainability Appraisal for Mundesley MUN03/A). Susceptibility to surface water flooding outside 2 Church Lane due to inadequate drainage. The SA records negative scores for SA1, SA6, SA8 and SA9. In relation to SA8, a new development at this site would not enhance the local area and would have a negative impact on the wildlife (foxes, badgers, muntjacs, green woodpeckers and buzzards) which lives in the bank on the western side of the development.</p>
Officer Response	<p>Disagree: The SA assessments within the Addendum to the Sustainability Appraisal Report [Examination ref. FC006] have followed the same methodology as the main Sustainability Appraisal Report [Examination ref. A3], where policies and site proposals have been consistently assessed against the comprehensive set of established sustainability objectives, as detailed in the Sustainability Framework of the main SA Report [A3], Chapter 6. These objectives have been consulted upon and examined during the hearing sessions at the Examination in Public in early 2024. The scoring for the SA objectives has been accurately and consistently applied to all of the proposed additional and alternative sites and extensions, including for MUN03/A. The site has an overall SA score of negative and positive, where the environmental and social objectives have mixed scores and the economic objectives score positively.</p> <p>The purpose of the SA assessments is to feed into and inform the site choices made through the detailed site assessments. The full assessments of the proposed additional sites can be found in the Additional Sites Review Background Paper [Examination ref. FC002].</p>

Supporting Document: Appendix 5 - Sustainability Appraisal Addendum

Section	Supporting Document: Appendix 5 - Sustainability Appraisal Addendum
ID	FC154
Response Date	06/12/2024 15:52:52
Full Name	Mr Russell Reeve
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>For proposed HV01 extension and HVO6, as well as reserve site HV05:</p> <ul style="list-style-type: none"> • The proposals would extend the existing site allocation much further northwards into open countryside/ prime farming land. • Housing would now be much closer to the historic park and gardens of Hoveton Hall, it will also be in the closer proximity to Grade II Listed Church at St Peters. • Sites, especially HV06, are subject to surface water flooding. • The expanded sites will have a negative impact on biodiversity rather than being stated as uncertain. • Education and roads need extra capacity. <p>For the 16 sustainability criteria: SA2, SA3, SA4, SA11 and SA13 are neutral, not positive SA6 and SA9 are negative. Hence negatives outweigh positives.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	The benefits of the proposed sites are outweighed by the negatives for these proposed site allocations in Hoveton.
Include files	
Officer Summary	<p>Object: Representation is in response to proposed site HV01 extension and HVO6, as well as reserve site HV05. The expanded sites will have a negative impact on biodiversity rather than the stated 'uncertain' in the SA assessments. Of the 16 SA criteria, 5 should be scored neutral and not positive (SA2, SA3, SA4, SA11 and SA13). SA6 and SA9 are negative, which overall concludes in more negatives than positives.</p> <p>Proposed Site HV01/C - the proposals would extend the existing site allocation much further northwards into open countryside/ prime farming land, locating housing much closer to the historic park and gardens of Hoveton Hall and Grade II listed St.Peter's church. The site is subject to surface water flooding, as is HV06 and education provision and roads require extra provision.</p>
Officer Response	<p>Disagree: The SA assessments within the Addendum to the Sustainability Appraisal Report [Examination ref. FC006] have followed the same methodology as the main Sustainability Appraisal Report [Examination ref. A3], where policies and site proposals have been consistently assessed against the comprehensive set of established sustainability objectives, as detailed in the Sustainability Framework of the main SA Report [A3], Chapter 6. These objectives have been consulted upon and examined during the hearing sessions at the Examination in Public in early 2024. The scoring for the SA objectives has been accurately and consistently applied to all of the proposed additional and alternative sites and extensions, including HV01/C, HV06/A and HV05.</p> <p>The purpose of the SA assessments is to feed into and inform the site choices made through the detailed site assessments. The full assessments of the proposed additional sites can be found in the Additional Sites Review Background Paper [Examination ref. FC002].</p>
Section	Supporting Document: Appendix 5 - Sustainability Appraisal Addendum
ID	FC159
Response Date	06/12/2024 16:29:18
Full Name	Mr Ben Bethell
Organisation	Clerk and RFO

	Hoveton Community (Parish) Council
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILE No. The proposed change is not well considered. It is not justified.
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	As a Council with close ties to its community, we take these matters very seriously and would expect to be part of discussions at ALL stages.
Include files	NNDC LP response - Consultation December 2024 - Hoveton Community Council Addendums.pdf (1)
Officer Summary	Object: Appendix 5 - Representation is in response to proposed site HV01 extension and HVO6, as well as reserve site HV05. The expanded sites will have a negative impact on biodiversity rather than the stated 'uncertain' in the SA assessments. Of the 16 SA criteria, 5 should be scored neutral and not positive (SA2, SA3, SA4, SA11 and SA13). SA6 and SA9 are negative, which overall concludes in more negatives than positives. Proposed Site HV01/C - the proposals would extend the existing site allocation much further northwards into open countryside/ prime farming land, locating housing much closer to the historic park and gardens of Hoveton Hall and Grade II listed St.Peter's church. The site is subject to surface water flooding, as is HV06 and education provision and roads require extra provision.
Officer Response	Disagree: The SA assessments within the Addendum to the Sustainability Appraisal Report [Examination ref. FC006] have followed the same methodology as the main Sustainability Appraisal Report [Examination ref. A3], where policies and site proposals have been consistently assessed against the comprehensive set of established sustainability objectives, as detailed in the Sustainability Framework of the main SA Report [A3], Chapter 6. These objectives have been consulted upon and examined during the hearing sessions at the Examination in Public in early 2024. The scoring for the SA objectives has been accurately and consistently applied to all of the proposed additional and alternative sites and extensions, including HV01/C, HV06/A and HV05. The purpose of the SA assessments is to feed into and inform the site choices made through the detailed site assessments. The full assessments of the proposed additional sites can be found in the Additional Sites Review Background Paper [Examination ref. FC002].
Section	Supporting Document: Appendix 5 - Sustainability Appraisal Addendum
ID	FC174
Response Date	08/12/2024 18:26:34
Full Name	Mrs Hilary Reeve
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	For proposed HV01 extension and HVO6, as well as reserve site HV05: <ul style="list-style-type: none"> • The proposals would extend the existing site allocation much further northwards into open countryside/ prime farming land. • Housing would now be much closer to the historic park and gardens of Hoveton Hall, it will also be in the closer proximity to Grade II Listed Church at St Peters. • Sites, especially HV06, are subject to surface water flooding. • The expanded sites will have a negative impact on biodiversity rather than being stated as uncertain. • Education and roads need extra capacity. For the 16 sustainability criteria: SA2, SA3, SA4, SA11 and SA13 are neutral, not positive SA6 and SA9 are negative. Hence negatives outweigh positives.

Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	<p>Object: Appendix 5 - Representation is in response to proposed site HV01 extension and HVO6, as well as reserve site HV05. The expanded sites will have a negative impact on biodiversity rather than the stated 'uncertain' in the SA assessments. Of the 16 SA criteria, 5 should be scored neutral and not positive (SA2, SA3, SA4, SA11 and SA13). SA6 and SA9 are negative, which overall concludes in more negatives than positives.</p> <p>Proposed Site HV01/C - the proposals would extend the existing site allocation much further northwards into open countryside/ prime farming land, locating housing much closer to the historic park and gardens of Hoveton Hall and Grade II listed St.Peter's church. The site is subject to surface water flooding, as is HV06 and education provision and roads require extra provision.</p>
Officer Response	<p>Disagree: The SA assessments within the Addendum to the Sustainability Appraisal Report [Examination ref. FC006] have followed the same methodology as the main Sustainability Appraisal Report [Examination ref. A3], where policies and site proposals have been consistently assessed against the comprehensive set of established sustainability objectives, as detailed in the Sustainability Framework of the main SA Report [A3], Chapter 6. These objectives have been consulted upon and examined during the hearing sessions at the Examination in Public in early 2024. The scoring for the SA objectives has been accurately and consistently applied to all of the proposed additional and alternative sites and extensions, including HV01/C, HV06/A and HV05.</p> <p>The purpose of the SA assessments is to feed into and inform the site choices made through the detailed site assessments. The full assessments of the proposed additional sites can be found in the Additional Sites Review Background Paper [Examination ref. FC002].</p>
Section	Supporting Document: Appendix 5 - Sustainability Appraisal Addendum
ID	FC193
Response Date	09/12/2024 14:23:35
Full Name	Robert Harbord-Hamond
Organisation	
Agent Full Name	Marie Laidler
Agent Organisation	Sworders
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>In relation to C22/4 (Extension to existing allocation C22/2), this is a large extension of the submission document allocation (C22/2); however, a large majority of this area was not initially published as an alternative site for assessment in terms of suitability for development. Therefore, it is questioned whether this is a realistic opportunity to rely on additional housing within this site without having been fully assessed. It is not considered that the proposed change is justified in contributing to the assessment of overall soundness of the Plan.</p> <p>Furthermore, part of the allocation (C18) was originally assessed as not suitable for development within the First Draft Local Plan (Part 1) Alternatives Considered (Examination Library Document Reference B6), however it was later reported to have a positive site score for residential development within the Sustainability Appraisal Report – January 2022 (Examination Library Document Reference A3) as being on the edge of the settlement and with access to public transport facilities etc.</p> <p>The recently published Addendum to the Sustainability Appraisal Report (Nov 2024) (Examination Document Reference FC006) also does not wholly conclude that the entire site (draft allocation plus extension with new ref. C22/4) is suitable for development as it sets out within Section 5 (Appraisal of Draft Additional Site Proposals and Extensions to existing Site Allocations – Preferred and Alternative Options):</p> <p><i>'The Social and Economic objectives score positively, and the Environmental objectives have a mixed score, given the potential negative impact on the designated landscape, biodiversity and nearby heritage asset.'</i></p>

	Extending the allocation would extend the settlement limit further south, further from the town centre than many of the alternative sites put forward and would harmfully encroach into the open countryside and the National Landscape. A landscape buffer would not be sufficient to mitigate this impact as suggested in the consultation. Furthermore, as evidenced in the site assessment the allocation will have a negative impact on biodiversity and the nearby heritage asset.
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	<p>Object: questions whether the proposed extension to site allocation C22/4 is a realistic opportunity that should be relied upon for additional housing without having been fully assessed, particularly given that it would extend the settlement further into open countryside and the National Landscape, where a landscape buffer would not be sufficient mitigation. The SA assessment states that the allocation will have a negative impact on biodiversity and the nearby heritage asset.</p> <p>The Addendum to the SA Report (Nov 2024) (Examination Ref. FC006) does not wholly conclude that the proposed extended site ref. C22/4 is suitable for development as it concludes that <i>'The Social and Economic objectives score positively, and the Environmental objectives have a mixed score, given the potential negative impact on the designated landscape, biodiversity and nearby heritage asset'</i>.</p> <p>It is not considered that the proposed change is justified in contributing to the assessment of overall soundness of the Plan.</p>
Officer Response	<p>Disagree: The SA assessments within the Addendum to the Sustainability Appraisal Report [Examination ref. FC006] have followed the same methodology as the main Sustainability Appraisal Report [Examination ref. A3], where policies and site proposals have been consistently assessed against the comprehensive set of established sustainability objectives, as detailed in the Sustainability Framework of the main SA Report [A3], Chapter 6. These objectives have been consulted upon and examined during the hearing sessions at the Examination in Public in early 2024.</p> <p>The scoring for the SA objectives has been applied to all of the proposed additional and alternative sites and extensions, including C22/4. The purpose of the SA assessments is to feed into and inform choices made through the detailed site assessments. The full assessments of the proposed additional sites can be found in the Additional Sites Review Background Paper [Examination ref. FC002]. The SA assessment for site C18 (which now forms part of the proposed site C22/4) scored positively overall – see main SA report [Examination ref. A3].</p>
Section	Supporting Document: Appendix 5 - Sustainability Appraisal Addendum
ID	FC462
Response Date	15/12/2024 16:35:00
Full Name	John Ford
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>APPENDIX 5 ~ SUSTAINABILITY APPRAISAL ADDENDUM (2024 - 2040 Doc Ref FC 006.) North Walsham Additional Preferred Option. Site Ref: NW16 ~ Land at end of Mundesley Road. I STRONGLY REFUTE THE CLAIMS MADE IN THIS APPRAISAL My Qualification: I live in the area. Some statistics for you: Distances from the edge of the Mundesley Road site entrance ~ To both Surgeries: 1.1 miles via residential streets ~ much longer via by pass,</p>

To Town Centre 0.9 miles (Dentist),
 To New Bus Hub 1.0 miles (Library and Lidl) (via residential),
 To Train Station: 1.4 miles via by pass,
 To Vets 1.4 miles via by pass,
 To Primary School 1.7 miles via by pass / 1.2 miles by short cuts through residential streets
 ~ very narrow and dangerous in places Swafield Rise ~ Mayfield Way ~ Acorn Road ~ Bluebell
 Rd past Small childrens playing field,
 To High School: 1.3 /1.7 miles(by pass) (through short cuts through streets),
 The Atrium: As above,
 To Memorial Park: 1.3/ 1.7 miles (by pass),
 Industrial Estate : 0.4 miles via Lyngate Road.
 To quote your document:
 "The site has good access to local Services" ~
 No it doesnt except for a small corner shop at the junction with Lyngate Road and Mundesley
 Road.
 "Education Facilities" No it doesnt
 "Peak time Public Transport links" No it doesnt
 "Leisure and cultural opportunities" No it doesnt
 "Employment Opportunitites" Yes ~ within Half a mile but at the last survey ~ 25 relatively
 low paid jobs only available. Unlikely to be able to afford the sort of houses proposed for the
 development.
 Overall the Sustainability Appraisal is very much NEGATIVE. It sits on the edge of the town
 and you would need to drive to virtually all of the above destinations and ~ on arrival ~ you
 would struggle to park anywhere.
 I think the appraisal is nonsense ~ but i suspect the reason for such conclusions in the
 appraisal may be found in my summary below.
 TRAFFIC ~ Lyngate Road connecting Mundesley Road with By Pass.
 There is little point in highlighting this issue as you already must be aware of the total chaos
 this development would create. Looking at the Richborough Estates proposals map ~ i dont
 think they even know where Lyngate Road is. It is currently the centre for chaos at the junction
 with the Mundesley Road by the Small local shop. Cars park on double yellow lines to go to
 the shop. Nothing can get round the Corner when the Sainsbury delivery trucks and Local
 buses need to negotiate it to get back on to the By Pass ~ and if you are walking down Lyngate
 Road to get to the Industrial Area (the closest facility to the development) you take your life
 in your hands on very narrow pavements.
 Few cars would use the proposed Tjunction with the B1145 for trips into Town ~ Doctors ~
 Dentists ~ Shops etc. They would all go either down the Mundesley Road or via the estates
 close by.
 All very dangerous with existing traffic volumes ~ and that is without an additional 400-500
 cars and goodness knows how many more journeys.
 You already have a spot traffic check in one of the other feedbacks in your consultation ~
 This didnt even include the peak traffic time at the end of the working day. Just madness.
 Pollution?

Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	I want to express my opinion because i would be directly and adversely affected by the development.
Include files	
Officer Summary	Object: strongly refutes claims made in the sustainability appraisal for the proposed site NW16 Land at End of Mundesley Road, North Walsham. Disagrees with assessment, in particular in relation to accessibility to local services, and provides distances to a number of services, facilities and employment opportunities ranging between 0.4 miles and 1.7 miles from the site. States that the site does not have good access to local services (apart from a corner shop), education facilities, peak time public transport, or leisure and cultural opportunities, concluding that the SA appraisal is much very negative as the site sits on the

	edge of the town where you would need to drive to virtually all local destinations. Suspects the reasons for the SA conclusions relate to traffic - Lyngate Road connecting Mundesley Road with the By Pass. Refers to significant existing traffic problems and that many road journeys would use alternative routes to avoid the T junction putting more pressure on already busy local roads. Refers to a spot traffic check in one of the other feedback points in the consultation that doesn't include the peak traffic time at the end of the working day.
Officer Response	<p>Disagree: The SA assessments within the Addendum to the Sustainability Appraisal Report [Examination ref. FC006] have followed the same methodology as the main Sustainability Appraisal Report [Examination ref. A3], where policies and site proposals have been consistently assessed against the comprehensive set of established sustainability objectives, as detailed in the Sustainability Framework of the main SA Report [A3], Chapter 6. These objectives have been consulted upon and examined during the hearing sessions at the Examination in Public in early 2024.</p> <p>The scoring for the SA objectives has been consistently applied to all of the proposed additional and alternative sites and extensions, including NW16. The site has an overall SA score of negative and positive, where the environmental objectives have a mixed overall score and the social and economic objectives score positively. The site has been correctly scored in relation to SA16, which relates to the objective of reducing the need to travel and promoting the use of sustainable transport, being one of sixteen SA objectives.</p> <p>The purpose of the SA assessments is to feed into and inform choices made through the detailed site assessments. The full assessments of the proposed additional sites can be found in the Additional Sites Review Background Paper [Examination ref. FC002]. The SA assessment for site C18 (which now forms part of the proposed site C22/4) scored positively overall – see main SA report [Examination ref. A3].</p>
Section	Supporting Document: Appendix 5 - Sustainability Appraisal Addendum
ID	FC464
Response Date	17/12/2024 11:22:00
Full Name	Mr Dennis Willis
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Sustainability Appraisal for both HV01/C and HV06/A should be NEGATIVE.</p> <p>SA Objective: 7. To increase the provision of green infrastructure. CANNOT be positive as land is being taken for this development. As will be green infrastructures. Adjacent Brook Park already built has proved this. Trees planted have failed to grow as are replacements.</p> <p>16. To reduce the need to travel and to promote the use of sustainable transport. positive - incorrect should be NEGATIVE. More traffic added to an already overloaded VILLAGE and already significant impact on roads that continually sink and need repairing. This is NOT just because of climate change this is because vehicles using them, including electric buses. are much bigger and heavier.</p> <p>Hoveton overall conclusion: MISLEADING - education, facilities, services and transport already overloaded. NNDC advised of lack of NHS dentistry support in VILLAGE in 2010 - still nothing done.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	<p>Object: Sustainability Appraisal for both HV01/C and HV06/A should be NEGATIVE.</p> <p>SA Objective: 7. To increase the provision of green infrastructure. cannot be positive as land is being taken for this development. As will be green infrastructures. Adjacent Brook Park already built has proved this. Trees planted have failed to grow as are replacements.</p>

	<p>SA objective 16. To reduce the need to travel and to promote the use of sustainable transport. A positive score is incorrect and should be negative, as more traffic will be added to an already overloaded village and already significant impact on roads that continually sink and need repairing. This is not just because of climate change but because vehicles using them, including electric buses, are much bigger and heavier.</p> <p>Hoveton overall conclusion is misleading, as the education, facilities, services and transport are already overloaded. NNDC were advised of the lack of NHS dentistry support in the village in 2010, but still nothing has been done.</p>
Officer Response	<p>Disagree: The SA assessments within the Addendum to the Sustainability Appraisal Report [Examination ref. FC006] have followed the same methodology as the main Sustainability Appraisal Report [Examination ref. A3], where policies and site proposals have been consistently assessed against the comprehensive set of established sustainability objectives, as detailed in the Sustainability Framework of the main SA Report [A3], Chapter 6. These objectives have been consulted upon and examined during the hearing sessions at the Examination in Public in early 2024.</p> <p>The scoring for the SA objectives has been accurately and consistently applied to all of the proposed additional and alternative sites and extensions, including HV01/C and HV06/A. The SA7 objective relates to whether development of the site would allow for the potential to contribute towards an increase in green infrastructure, where HV01/C scores as an uncertain effect and HV06/A scores as a neutral/no effect. The SA16 objective relates to the reduction of the need to travel and to promote the use of sustainable transport, where both sites score positively, having good access to local services, facilities and employment opportunities.</p> <p>The purpose of the SA assessments is to feed into and inform the site choices made through the detailed site assessments. The full assessments of the proposed additional sites can be found in the Additional Sites Review Background Paper [Examination ref. FC002].</p>
Section	Supporting Document: Appendix 5 - Sustainability Appraisal Addendum
ID	FC554
Response Date	18/12/2024 15:03:00
Full Name	Sarah Luff
Organisation	Norfolk County Council (Lead Local Flood Authority)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	The LLFA note the changes proposed to this document and confirm that we have no comments to make at this time in respect of the changes proposed.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	The LLFA note the changes proposed to this document and confirm that we have no comments to make at this time in respect of the changes proposed.
Officer Response	Comments noted.
Section	Supporting Document: Appendix 5 - Sustainability Appraisal Addendum
ID	FC596
Response Date	19/12/2024 12:03:00
Full Name	Gemma Clark
Organisation	Higher Officer, Sustainable Development, Norfolk Coast and Marine Team Natural England
Agent Full Name	
Agent Organisation	

<p>Does the Proposed Change contribute to the overall soundness of the Plan?</p>	<p>We confirm that the Sustainability Appraisal (SA) has been undertaken and meets the requirements of the SA Directive. The process has been undertaken in an iterative way alongside the preparation of the Local Plan.</p> <p>Overall, the Local Plan will have a positive effect, including a number of significant positive effects, on the sustainability objectives. However, page 281 (<i>SA Objective: SA1 - To promote the efficient use of land, minimise the loss of undeveloped land, optimise the use of previously developed land (PDL), buildings and existing infrastructure and protect the most valuable agricultural land</i>) acknowledges that the majority of development across the District will result in the loss of greenfield land. The table indicates this a negative, long term, permanent impact. In light of this the Draft Policy SS 1 Spatial Strategy on page 291 should record this as a negative impact rather than a neutral impact. We understand that there is limited previously developed land in the district, however the loss of greenfield land may have negative impacts on landscape, soil resources and biodiversity.</p> <p>The increase of development will also increase recreational disturbance to designated sites as stated in Appendix A – Appraisal of Draft Policies Draft Policy SS 1 Spatial Strategy, page 293. Not all sites have onsite recreational provision, and some of the provision is very small. The coast will continue to be a draw to people regardless of recreational provision provided onsite and therefore it is arguable that SA objective 6 <i>To protect and enhance the areas’ biodiversity and geodiversity assets (protected and unprotected species and designated and non -designated sites)</i> should have a positive score.</p> <p>In Appendix B - Appraisal of Draft Additional Site Proposals – Preferred Options page 298, Blakeney has an overall neutral score despite the findings in the Additional Sites Review Background Paper, page 30, where the site is described as <i>‘not considered suitable for development’</i>. It would be useful to understand the background as to why this site is now deemed suitable for development. Has recreational disturbance to Wiveton Downs SSSI been considered as part of the Sustainability Appraisal and impact has been ruled out? If so, this needs to be stated.</p>
<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>Include files</p>	
<p>Officer Summary</p>	<p>We confirm that the Sustainability Appraisal (SA) has been undertaken and meets the requirements of the SA Directive. The process has been undertaken in an iterative way alongside the preparation of the Local Plan.</p> <p>Draft Policy SS1 Spatial Strategy should record the SA1 Objective as a negative impact rather than a neutral impact. We understand that there is limited previously developed land in the district, however the loss of greenfield land may have negative impacts on landscape, soil resources and biodiversity.</p> <p>The increase of development will also increase recreational disturbance to designated sites as stated in Appendix A – Appraisal of Draft Policies Draft Policy SS 1 Spatial Strategy, page 293. Not all sites have onsite recreational provision, and some of the provision is very small. The coast will continue to be a draw to people regardless of recreational provision provided onsite and therefore it is arguable that SA objective 6 <i>To protect and enhance the areas’ biodiversity and geodiversity assets (protected and unprotected species and designated and non -designated sites)</i> should have a positive score.</p> <p>In Appendix B - Appraisal of Draft Additional Site Proposals – Preferred Options page 298, Blakeney has an overall neutral score despite the findings in the Additional Sites Review Background Paper, page 30, where the site is described as <i>‘not considered suitable for development’</i>. It would be useful to understand the background as to why this site is now deemed suitable for development. Has recreational disturbance to Wiveton Downs SSSI been considered as part of the Sustainability Appraisal and impact has been ruled out? If so, this needs to be stated.</p>
<p>Officer Response</p>	<p>Comments noted.</p> <p>The reiteration that the SA meets the requirements of the SA Directive is welcomed.</p> <p>The SA Objective SA1 covers a number of matters within it – promotion of efficient use of land, minimisation of loss of undeveloped land, optimisation of use of previously developed land (PDL), buildings and existing infrastructure and protection most valuable agricultural land. Draft Policy SS1 scores this objective as neutral, taking into account the impact on each of these matters, and particularly as the approach concentrates the majority of the growth</p>

(approximately 90%) into the identified top three tiers of the settlement hierarchy. As such, development is directed to the most appropriate land, minimising the loss of undeveloped land and keeping sites close to existing settlement boundaries. The scoring acknowledges the limited brownfield sites across the district. The number of Small Growth Villages identified would increase from 23 (currently listed in the policy) to 33, which would have the opportunity to deliver proportionate small scale growth of an increased allowance of 9%. Along with windfall development these sites will be a mix of brownfield and greenfield.

The updated SA Objective SA1 within the SA Addendum relates to the Significant Effects (section 7) where a cumulative assessment for all of the relevant policies against each SA Objective is recorded, based on the results set out in Table 2 of the document. Given that the options for the significant effects are either positive or negative, the assessment for Objective SA1 is considered to reflect the combined scoring of the policies.

In relation to site BLA01/B at Blakeney, the site was previously identified as suitable for development, but this was removed by the Council ahead of the subsequent consultation. The assessment for SA Objective SA8 relates to the protection, management and where possible enhancement of the special qualities of the area's landscapes, townscapes, and seascapes (designated and non-designated) and their settings, maintaining and strengthening local distinctiveness and sense of place. For BLA01/B, the score for SA Objective SA8 takes account of the designations including Wiveton Downs SSSI and scores negative, due to its close proximity to the site combined with the presence of a number of other designations close by.

Supporting Document: Appendix 6 - Habitat Regulations Assessment Addendum

Section	Supporting Document: Appendix 6 - Habitat Regulations Assessment Addendum
ID	FC155
Response Date	06/12/2024 15:38:54
Full Name	Mr Russell Reeve
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>HV01 and HV06</p> <p>The loss of these sites close to the Broadland SPA/Ramsar are of more significance than is being stated in the Habitat Regulations Assessment provided for NNDC, which greatly understates the loss of bio-diversity by building on this piece of countryside. The hedgerows, trees and fields here are used larger numbers of birds and animal species. This loss will be much greater than being suggested, with this stated as survey data only being obtained from ariel photographs.</p> <p>The site is also in an area adjacent to the Broads requiring nutrient neutrality to be demonstrated.</p> <p>Similar comments would be applied to HV05, if the HRA assessment was also completed for this site.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	The sustainability appraisal is incorrect in suggesting that the site proposals HV01 and HV06 achieve a positive outcome for Hoveton.
Include files	
Officer Summary	<p>The loss of these sites (HV01 and HV06) close to the Broadland SPA/Ramsar are of more significance than is being stated in the Habitat Regulations Assessment provided for NNDC, which greatly understates the loss of biodiversity by building on this piece of countryside. The hedgerows, trees and fields here are used larger numbers of birds and animal species. This loss will be much greater than being suggested, with this stated as survey data only being obtained from ariel photographs.</p> <p>The site is also in an area adjacent to the Broads requiring nutrient neutrality to be demonstrated.</p> <p>Similar comments would be applied to HV05, if the HRA assessment was also completed for this site.</p>
Officer Response	<p>Comments noted. The purpose of an HRA is to assess the impacts of the local plan on International recognised sites Together these Special Protection Areas and Special Areas of Conservation and Ramsar sites are known as European sites Es. The HRA does not assess site specific impacts on biodiversity and landscape, instead it assesses the potential likely significant effects on impact pathways such as the loss of supporting habitat that form the qualifying features of the Es, general urban effects, recreation, water issues and Air quality and provides recommendations for particular checks at project level to inform any specific application and ensure there is appropriate mitigation.</p>
Section	Supporting Document: Appendix 6 - Habitat Regulations Assessment Addendum
ID	FC160
Response Date	06/12/2024 16:29:48
Full Name	Mr Ben Bethell
Organisation	Clerk and RFO Hoveton Community (Parish) Council
Agent Full Name	
Agent Organisation	

Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILE No. The proposed change is not well considered. It is not justified.
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	As a Council with close ties to its community, we take these matters very seriously and would expect to be part of discussions at ALL stages.
Include files	NNDC LP response - Consultation December 2024 - Hoveton Community Council Addendums.pdf (2)
Officer Summary	The loss of these sites (HV01 and HV06) close to the Broadland SPA/Ramsar are of more significance than is being stated in the Habitat Regulations Assessment provided for NNDC, which greatly understates the loss of biodiversity by building on this piece of countryside. The hedgerows, trees and fields here are used larger numbers of birds and animal species. This loss will be much greater than being suggested, with this stated as survey data only being obtained from ariel photographs. The site is also in an area adjacent to the Broads requiring nutrient neutrality to be demonstrated. Similar comments would be applied to HV05, if the HRA assessment was also completed for this site.
Officer Response	Comments noted. The purpose of an HRA is to assess the impacts of the local plan on International recognised sites Together these Special Protection Areas and Special Areas of Conservation and Ramsar sites are known as European sites Es. The HRA does not assess site specific impacts on biodiversity and landscape, instead it assesses the potential likely significant effects on impact pathways such as the loss of supporting habitat that form the qualifying features of the Es, general urban effects, recreation, water issues and Air quality and provides recommendations for particular checks at project level to inform any specific application and ensure there is appropriate mitigation.
Section	Supporting Document: Appendix 6 - Habitat Regulations Assessment Addendum
ID	FC175
Response Date	08/12/2024 18:28:36
Full Name	Mrs Hilary Reeve
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	HV01 and HV06 - The loss of these sites close to the Broadland SPA/Ramsar are of more significance than is being stated in the Habitat Regulations Assessment provided for NNDC, which greatly understates the loss of bio-diversity by building on this piece of countryside. The hedgerows, trees and fields here are used larger numbers of birds and animal species. This loss will be much greater than being suggested, with this stated as survey data only being obtained from ariel photographs. The site is also in an area adjacent to the Broads requiring nutrient neutrality to be demonstrated.
Do you consider it necessary to participate in a public hearing session, should these be required?	No
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	The loss of these sites (HV01 and HV06) close to the Broadland SPA/Ramsar are of more significance than is being stated in the Habitat Regulations Assessment provided for NNDC, which greatly understates the loss of biodiversity by building on this piece of countryside. The hedgerows, trees and fields here are used larger numbers of birds and animal species. This loss will be much greater than being suggested, with this stated as survey data only

	being obtained from ariel photographs. The site is also in an area adjacent to the Broads requiring nutrient neutrality to be demonstrated.
Officer Response	Comments noted. The purpose of an HRA is to assess the impacts of the local plan on International recognised sites Together these Special Protection Areas and Special Areas of Conservation and Ramsar sites are known as European sites Es. The HRA does not assess site specific impacts on biodiversity and landscape, instead it assesses the potential likely significant effects on impact pathways such as the loss of supporting habitat that form the qualifying features of the Es, general urban effects, recreation, water issues and Air quality and provides recommendations for particular checks at project level to inform any specific application and ensure there is appropriate mitigation.
Section	Supporting Document: Appendix 6 - Habitat Regulations Assessment Addendum
ID	FC424
Response Date	18/12/2024 22:43:07
Full Name	Ms Hannah Gent
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>A new development at this site would not enhance the local area and would have a negative impact on the wildlife (foxes, badgers, muntjacs, green woodpeckers and buzzards) which lives in the bank on the western side of the development.</p> <p>Nutrient neutrality to be demonstrated for this development.</p> <p>Inadequate assessment provided by NNDC of the impact to the wildlife and habitats in the immediate vicinity.</p> <p>MUN03/B is agricultural land. However MUN03/A has been pastureland for decades and hence has cultivated a wide range of wildflowers and plants which has increased biodiversity in this area.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	<p>A new development at this site would not enhance the local area and would have a negative impact on the wildlife (foxes, badgers, muntjacs, green woodpeckers and buzzards) which lives in the bank on the western side of the development.</p> <p>Nutrient neutrality to be demonstrated for this development.</p> <p>Inadequate assessment provided by NNDC of the impact to the wildlife and habitats in the immediate vicinity.</p> <p>MUN03/B is agricultural land. However, MUN03/A has been pastureland for decades and hence has cultivated a wide range of wildflowers and plants which has increased biodiversity in this area.</p>
Officer Response	Comments noted. The purpose of an HRA is to assess the impacts of the local plan on International recognised sites Together these Special Protection Areas and Special Areas of Conservation and Ramsar sites are known as European sites Es. The HRA does not assess site specific impacts on biodiversity and landscape, instead it assesses the potential likely significant effects on impact pathways such as the loss of supporting habitat that form the qualifying features of the Es, general urban effects, recreation, water issues and Air quality and provides recommendations for particular checks at project level to inform any specific application and ensure there is appropriate mitigation. It should ne noted that the site mentioned is outside any nutrient neutrality catchment.
Section	Supporting Document: Appendix 6 - Habitat Regulations Assessment Addendum
ID	FC555
Response Date	18/12/2024 15:03:00

Full Name	Sarah Luff
Organisation	Norfolk County Council (Lead Local Flood Authority)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	The LLFA note the changes proposed to this document and confirm that we have no comments to make at this time in respect of the changes proposed.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	The LLFA note the changes proposed to this document and confirm that we have no comments to make at this time in respect of the changes proposed.
Officer Response	Comments noted.
Section	Supporting Document: Appendix 6 - Habitat Regulations Assessment Addendum
ID	FC597
Response Date	19/12/2024 12:03:00
Full Name	Gemma Clark
Organisation	Higher Officer, Sustainable Development, Norfolk Coast and Marine Team Natural England
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Summary</p> <p>The HRA has screened impacts relating to the additional allocations and settlements and concludes that you are able to ascertain that the plan policies will not result in an Adverse Effect On Integrity (AEOI) of any of the sites in question. Having considered the assessment Natural England advises that we concur with the assessment conclusions so far in relation to water quality, however we have some concerns relating to recreational disturbance.</p> <p>Sites scoped in include:</p> <ul style="list-style-type: none"> • Broads/SAC/SPA/Ramsar • The Wash SPA/Ramsar • The Wash & North Norfolk Coast SAC • North Norfolk Coast SAC/SPA/Ramsar • Norfolk Valley Fens SAC • Great Yarmouth Denes SPA • Winterton Horsey Dunes SAC • Breydon Water SPA/Ramsar • River Wensum SAC <p>After screening all the new allocated sites would trigger Likely Significant Effects (LSE) for water quality and/or increased recreation (table 3 page 10 – 13). The additional 10 Small Growth Villages also trigger LSE for water quality, increased recreation, general urban effects and in the case of Great Ryburgh, potential loss of supporting habitat due to the proximity to River Wensum SAC.</p> <p>Recreation</p> <p>Para 1.17 refers to GIRAMS and how that measure can be used to ensure that in-combination impacts are ruled out from the increased development. It is acknowledged in para 1.18 that large developments (above 50 dwellings) may trigger LSE alone and additional mitigation in the form of enhanced green infrastructure may be necessary. Therefore, large developments should undertake a project level HRA and deliver sufficient green infrastructure. There may be added pressure of recreational disturbance to designated sites despite the proximity of onsite green infrastructure, therefore enhancement and buffering of existing designations might be one way of ensuring their protection from increased development across the district.</p>

Para 1.19 recognises that Allocation BLA01B in Blakeney is particularly sensitive to recreational pressure due to its proximity to European sites and that provision of on-site green infrastructure is particularly important to ensure that adverse effects on the integrity (AEOI) on designated sites can be ruled out. Natural England have expressed concern previously in this letter as to this development. Wiveton Downs SSSI is not a component site for other designations so as well as a HRA for the nearby coastal European sites, a SSSI impact assessment will need to be undertaken to ensure that Wiveton Downs SSSI is not adversely impacted by development.

Water Quality

Many of the sites are in Nutrient Neutrality catchments of The Broads and River Wensum. For these allocations a project level HRA will need to be undertaken informed by a nutrient budget calculation and mitigation strategy. This will ensure that AEOI on The Broads and River Wensum SACs can be ruled out. This has been outlined in para 1.20 and Natural England offer no further comments in relation to water quality impacts.

Great Ryburgh

This village is directly adjacent to the River Wensum SAC and there is a risk that growth in such close proximity will have impacts to the SAC in addition to Nutrient Neutrality. A Project level HRA will also need to consider run-off, threats from non-native species and loss of supporting habitat if sites in this village come forward.

Do you consider it necessary to participate in a public hearing session, should these be required?

If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:

Include files

Officer Summary

The HRA has screened impacts relating to the additional allocations and settlements and concludes that you are able to ascertain that the plan policies will not result in an Adverse Effect on Integrity (AEOI) of any of the sites in question. Having considered the assessment Natural England advises that we concur with the assessment conclusions so far in relation to water quality, however we have some concerns relating to recreational disturbance.

Sites scoped in include:

- Broads/SAC/SPA/Ramsar
- The Wash SPA/Ramsar
- The Wash & North Norfolk Coast SAC
- North Norfolk Coast SAC/SPA/Ramsar
- Norfolk Valley Fens SAC
- Great Yarmouth Denes SPA
- Winterton Horsey Dunes SAC
- Breydon Water SPA/Ramsar
- River Wensum SAC

After screening all the new allocated sites would trigger Likely Significant Effects (LSE) for water quality and/or increased recreation (table 3 page 10 – 13). The additional 10 Small Growth Villages also trigger LSE for water quality, increased recreation, general urban effects and in the case of Great Ryburgh, potential loss of supporting habitat due to the proximity to River Wensum SAC.

Recreation

Para 1.17 refers to GIRAMS and how that measure can be used to ensure that in-combination impacts are ruled out from the increased development. It is acknowledged in para 1.18 that large developments (above 50 dwellings) may trigger LSE alone and additional mitigation in the form of enhanced green infrastructure may be necessary. Therefore, large developments should undertake a project level HRA and deliver sufficient green infrastructure. There may be added pressure of recreational disturbance to designated sites despite the proximity of onsite green infrastructure, therefore enhancement and buffering of existing designations might be one way of ensuring their protection from increased development across the district. Para 1.19 recognises that Allocation BLA01B in Blakeney is particularly sensitive to recreational pressure due to its proximity to European sites and that provision of on-site green infrastructure is particularly important to ensure that adverse effects on the integrity (AEOI) on designated sites can be ruled out. Natural England have expressed concern previously in this letter as to this development. Wiveton Downs SSSI is not a component site for other designations so as well as a HRA for the nearby coastal European sites, a SSSI impact assessment will need to be undertaken to ensure that Wiveton Downs SSSI is not adversely impacted by development.

	<p>Water Quality Many of the sites are in Nutrient Neutrality catchments of The Broads and River Wensum. For these allocations a project level HRA will need to be undertaken informed by a nutrient budget calculation and mitigation strategy. This will ensure that AEOI on The Broads and River Wensum SACs can be ruled out. This has been outlined in para 1.20 and Natural England offer no further comments in relation to water quality impacts.</p> <p>Great Ryburgh This village is directly adjacent to the River Wensum SAC and there is a risk that growth in such close proximity will have impacts to the SAC in addition to Nutrient Neutrality. A Project level HRA will also need to consider run-off, threats from non-native species and loss of supporting habitat if sites in this village come forward.</p>
<p>Officer Response</p>	<p>Support noted. Agree to consider modification and amend as necessary. See modification schedule. A modification already put forward and examined to Policy CC13 includes the agreed position from the earlier hearings around qualifying development located in the catchments of the River Wensum SAC and Broads SAC and the Broadland Ramsar providing evidence of no adverse effects on the integrity of the habitats sites and demonstrate nutrient neutrality.</p> <p>Policies CC11 and ENV5 cover the strategic mitigation to recreation. Planning position will only be granted subject to demonstrating no adverse effect on the integrity of Es from recreational disturbance and contributions will be required towards the strategic mitigation measures in accordance with the Norfolk Wide GIRAMS. The strategy also requires additional enhanced GI for larger scale proposals of 50 plus units through the additional provision of onsite enhanced GI or contributions towards off site strategic GI. Such EGI should be of a scale and quality to be able to divert and deflect visitors to Es. These requirements have already been examined in previous hearings and are not part of this further consultation.</p>

Local Plan Further Consultation Schedule of Representations (Other & General Comments)

Other/General Comments (including those not directly relating to a Proposed Change as set out in the Further Consultation)

Section	General Comments (including those not directly relating to a Proposed Change as set out in the Further Consultation)
ID	FC219
Response Date	10/12/2024 11:46:00
Full Name	Mrs Gemma Harrison
Organisation	Holt Town Clerk Holt Town Council
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Thank you for re-consulting with Holt Town Council on the Emerging Local Plan.</p> <p>Cllrs are disappointed to see that no further sites in Holt have been allocated for development in the Emerging Plan. The Town Council have approached NNDC on several occasions to request that sites within Holt are incorporated into the new plan. The Town Council is unusual in its stance, in that it welcomes development, and is keen to see the town grow and prosper. Cllrs have been proactive in seeking out new sites and presenting them to officers, but further site assessments have not been carried out and as such sites were not able to be carried forward. A large part of what was being proposed is now no longer available.</p> <p>Cllrs feel frustrated by the lack of proposed growth in Holt and feel their views, and that of the Planning Inspector back in January, are not being listened to.</p> <p>Holt is centrally located within North Norfolk; it is located on the A148, a main corridor through North Norfolk. It has the HQ of the largest bus company in the area, which makes Holt well connected. It has a large private school and will soon have a brand-new Primary School; it has all the main shops and services including a newly extended doctors' surgery. The area does not suffer from the Nitrate Neutrality restrictions, or flooding, that so many other towns in the area are struggling with.</p> <p>Whilst Holt lends itself to more growth, other areas identified in the plan, such as small growth villages, do not have the infrastructure and most importantly the need for new housing. High Kelling is one example (which is adjacent to Holt) and finds itself allocated 20 new homes, when existing new homes such as the Warren Barn site could not sell and instead eventually had to be rented out. These smaller rural sites will not deliver housing in sustainable locations and will not deliver the affordable housing which larger developments will offer. For this reason, Cllrs believe the Emerging Plan is flawed and will not meet the needs of the residents and future residents of North Norfolk.</p> <p>The plan lacks evidence to support its proposals, there has been no transport evidence provided on the impact the proposed developments will have on the local and wider road networks. Without this evidence how is it possible to identify where development should and shouldn't take place.</p> <p>There is no justification within the plan to why Holt has not been allocated an employment site. Holt is in desperate need to hold onto its younger generation but with no new employment opportunities they find themselves with no choice but to relocate elsewhere.</p> <p>Cllrs believe the Local Plan should do more than just be a tick box exercise for providing the required housing numbers, and instead look to encourage economic growth and provide sustainable, thriving towns throughout its district. It should be tackling the homelessness crisis by providing more affordable homes in the towns where facilities and services already exist. It should look to encourage new job opportunities to retain its residents in the towns where they were born and have grown up in.</p> <p>The Emerging Plan is not effective as it does not deliver any of the above for Holt and as such there are many missed opportunities for the residents in the town. Cllrs can see that Holt offers many opportunities for sustainable growth and yet they cannot see any evidence as to why the Local Plan does not cater for this. They can see where growth has been allocated but cannot see the evidence to show what impact the locations chosen, have on the road network, they cannot see how sustainable they are in comparison to Holt and or understand their economic viability.</p> <p>Cllrs believe the plan in its current form is unsound and requires further work to ensure it delivers for everyone living in North Norfolk.</p>

<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>Include files</p>	
<p>Officer Summary</p>	<p>Cllrs are disappointed to see that no further sites in Holt have been allocated for development in the Emerging Plan.</p> <p>Whilst Holt lends itself to more growth, other areas identified in the plan, such as small growth villages, do not have the infrastructure and most importantly the need for new housing. High Kelling is one example (which is adjacent to Holt) and finds itself allocated 20 new homes, when existing new homes such as the Warren Barn site could not sell and instead eventually had to be rented out. These smaller rural sites will not deliver housing in sustainable locations and will not deliver the affordable housing which larger developments will offer. For this reason, Cllrs believe the Emerging Plan is flawed and will not meet the needs of the residents and future residents of North Norfolk.</p> <p>The plan lacks evidence to support its proposals, there has been no transport evidence provided on the impact the proposed developments will have on the local and wider road networks. Without this evidence how is it possible to identify where development should and shouldn't take place.</p> <p>There is no justification within the plan to why Holt has not been allocated an employment site. Holt is in desperate need to hold onto its younger generation but with no new employment opportunities they find themselves with no choice but to relocate elsewhere.</p> <p>Cllrs believe the Local Plan should do more than just be a tick box exercise for providing the required housing numbers, and instead look to encourage economic growth and provide sustainable, thriving towns throughout its district. It should be tackling the homelessness crisis by providing more affordable homes in the towns where facilities and services already exist. It should look to encourage new job opportunities to retain its residents in the towns where they were born and have grown up in.</p> <p>The Emerging Plan is not effective as it does not deliver any of the above for Holt and as such there are many missed opportunities for the residents in the town. Cllrs can see that Holt offers many opportunities for sustainable growth and yet they cannot see any evidence as to why the Local Plan does not cater for this. They can see where growth has been allocated but cannot see the evidence to show what impact the locations chosen, have on the road network, they cannot see how sustainable they are in comparison to Holt and or understand their economic viability.</p>
<p>Officer Response</p>	<p>Comments noted: These comments do not relate to the modifications proposed and being consulted on and largely reiterates points already expressed earlier in the process and examined and concluded on at the earlier hearings. The inspector in his initial letter to the council, as detailed in appendix 7 of the consultation material confirms that the spatial strategy as set out in SS1 is a justified approach and the methodology for arriving at the hierarchy as set out in background paper 2[C2] and the site selection methodology in Background paper, [C6] provide the appropriate evidence. For sustainability and accessibility reasons the Plan aims to direct the majority of growth towards the larger towns with successively lower levels of growth in the case of the lower tiers with few services and facilities. The apportionment of growth and site allocations are made on a detailed review and assessment of promoted sites for their availability and suitability. The evidence of this for Holt can be found in the site review paper for Holt D4 and the conclusions are supported by the detailed evidence published in the submission library.</p> <p>A number of alternative options have been considered in identifying additional sites and the background paper contained in the further consultation material at appendix 1 and provides the detailed justification of the approach taken. The Council is not currently in a position to review new site submissions at this stage of the Local Plan and has not undertaken a "call for sites". It should also be noted that the inspector specifically sought the consideration of the expansion of the number of small growth villages and the increase in growth above 6% as put forward in proposed changes 12 and 13 and detailed in his initial letter</p> <p>The approach set out in order to address the identified shortfall is positively prepared and reflects the limitations in line with the time limits now expected following intervention in plan making by the new government following the national election as set out in the letter from the housing minister, Matthew Pennycook to the Planning Inspectorate dated 31st July 2024 which sets "states that pragmatism should not be used to address fundamental issues with the soundness of a plan, which would be likely to require pausing or delaying the examination</p>

process for more than six months overall". The approach as detailed in the background paper set out in appendix 1 to this consultation is based upon a review of sites already considered suitable but previously not required. In doing so it is considered that there are enough sites in conjunction with increase in supporting rural growth to address the issues of soundness as identified by the inspector at this time.

The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the Districts existing and future identified needs for all types of development. This includes providing choice and flexibility and supporting the rural economy and small growth villages.

Town councillors are well aware of the fact and the reasons why the proposed employment site was removed from the submitted plan by the site owner. Being part of the discussions at the hearing sessions cllrs are also aware that modifications are before the Inspector that ensure policy support for further flexibility in employment provision outside designated growth settlements and as such would provide policy support for additional employment sites to come forward should their be a demand. This is despite the fact that the Plan identifies an over provision of employment land in comparison to the projected growth. Such modifications will be subject to a specific modification consultation process as directed by the inspector in due course.

As with all parishes the town council is encouraged to identify any further local need in addition to but in general conformity with the strategic requirements set out in the Local Plan in order to help plan for and address any specific local need. The town council were advised of the opportunity and process of including additional allocations in the recently adopted Neighbourhood Plan but chose not to. In any review and update of the neighbourhood plan following adoption of the Local Plan the opportunity exists for the town council to choose to quantify any additional needs and seek to identify appropriate specific available and deliverable sites to meet that need through neighbourhood planning. Officers will be available to continue to provide effective advice and support.

Section	General Comments (including those not directly relating to a Proposed Change as set out in the Further Consultation)
ID	FC358
Response Date	17/12/2024 10:37:00
Full Name	Victoria Demetriou-Smith
Organisation	Gladman Developments Ltd
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILE
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	Gladman Letter- Further Sites .pdf
Officer Summary	<p>Gladman welcome the additional 20% buffer applied to this figure in identifying an additional 1,271 dwellings. However, the recently published National Planning Policy Framework (December 2024) has changed the standard methodology that increases the Local Housing Need in North Norfolk from 556 to 932. As such, Gladman recommend an immediate review of the Local Plan to ensure that the new housing need figure is accommodated as soon as possible and in line with the new NPPF expectations. Gladman recommends the following policy wording is inserted into the plan to ensure that the plan remains up to date and in line with national policy:</p> <p><i>Policy XX: Reviewing the Local Plan The Council will undertake a review of the Local Plan which will commence no later than one year after the adoption of the plan. An updated or replacement plan will be submitted for examination no later than three years after the date of adoption of the plan. In the event that this submission date is not adhered to, the policies</i></p>

relating to the supply of land will be deemed out of date in accordance with paragraph 11d) of the National Planning Policy Framework. The reviewed plan will secure levels of growth that accord with the Standard Method and any growth deals that have been agreed."

Gladman have several concerns Gladman have several concerns regarding the selection of land at End of Mundesley Road largely pertaining to the scoring within the HELAA that demonstrates other sites are more suitable for residential development. Gladman are promoting Land at Yarmouth Road (HELAA ref H0164) and a significant portion of Land at Mushroom Farm, A149 (HELAA ref H0165) for residential development.

Land at End of Mundesley Road is not the most suitable location for development. Gladman consider that the allocation is therefore unjustified and contrary to the Council's evidence base. Paragraph 2.3.4 states that 'the site is considered suitable and available for development. There are limited constraints on the site.' This is directly contrary to the HELAA which clearly states that the site is not suitable and has a significant constraint.

Overall, Gladman consider the allocation of Land at End of Mundesley Road to be unjustified based on the contradictory statements within the HELAA and consultation document. There are alternatives within North Walsham that are suitable and available, such as Land Adjacent to Mushroom Farm, and others that while not considered suitable in the HELAA, can overcome the concerns without the vulnerability of significant infrastructure requirements that pose a risk to the viability and deliverability of the site, and therefore meet housing needs in the short to medium term.

Officer Response

Comments noted - Disagree. The Plan is being examined under the previous September 2023 NPPF under transitional arrangements. The addition of a policy reflecting the terms of the revised NPPF is not needed. The requirements for local plan review in relation to housing numbers as submitted and those of the new national standard methodology are clearly stated in the revised NPPF and do not need repeating in a separate policy in the LP. It is expected that the adopted plan will be reviewed in line with paragraph 34 of the December 2024 NPPF and reviews completed every 5 years from adoption and earlier in regard to relevant national policy changes such as if their applicable local housing need figure has changed significantly. Given the plan was submitted prior to 12th March 2025 paragraph 236 applies, and it is expected that the LPA will begin work on a new plan, under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (as soon as the relevant provisions are brought into force in 2025), in order to address the shortfall in housing need.

As detailed in the councils response to representation FC359 in relation to the objection to NW16 and the promotion of two alternatives sites it is worth noting that the 2017 HELLA was a high-level desktop study that informed the early stages of plan process and the districts capacity to accommodate residential development, it does not identify allocations and is not the full assessment that informed the Local Plan. the Hella informed a more detailed site review and this is found in Exam Doc, D3 & Appendix 1 of the Additional Sites Review Background Paper. The process is explained in detail in the site selection methodology paper, examination reference C6 The more detailed site assessment that supports the local plan and the alternatives now proposed under site references NW23 and NW24/43 can be found in background paper D3 and concludes that both sites are not considered to be suitable for development. As such they do not fall into the scope of the assessments for this further consultation as detailed in appendix 1 supporting the consultation material. Similarly, the full assessment of NW16 can be found in the local plan site assessment booklet D3 which concluded at the time that NW16 is suitable but not taken further as it was not required at the time. The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility. Further assessment of the site is provided in Appendix 1 of the consultation the Additional Sites Review Background Paper.

Section	General Comments (including those not directly relating to a Proposed Change as set out in the Further Consultation)
ID	FC405
Response Date	18/12/2024 16:59:00
Full Name	Cllr Victoria Holliday
Organisation	Member for Coastal Ward (NNDC)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	We quite understand the imperative for more housing in North Norfolk. However, when considering development in Weybourne, the array of services available are reduced from those at the time the settlement was given Small Growth Village status. At that time the village

	had one key service as required for the SGV classification, a village shop. Since then, the village shop has become a cafe with limited hours and a smaller offering of goods. This cafe is deservedly very popular, but does not fulfil the criteria of a convenience shop which is defined as 'a small store, often open long hours, that sells popular foods and other products'. Weybourne should no longer be classified as a small growth village.
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	Understands the imperative for more housing in North Norfolk. However, when considering development in Weybourne, the array of services available are reduced from those at the time the settlement was given Small Growth Village status. At that time the village had one key service as required for the SGV classification, a village shop. Since then, the village shop has become a cafe with limited hours and a smaller offering of goods. This cafe does not fulfil the criteria of a convenience shop which is defined as 'a small store, often open long hours, that sells popular foods and other products. Weybourne should no longer be classified as a small growth village.
Officer Response	The selection of all of the identified towns and villages within Policy SS1 Spatial Strategy, has followed a consistent methodology as detailed in Background Paper 2 Distribution of Growth [Examination ref C2]. The assessment of the range of services and facilities recorded for each of the villages contained in the Background Paper, including for Weybourne, were reviewed at various stages of the Local Plan process, and with all such evidence form a snapshot in time. The justification and principle for each of the submitted settlements were discussed at the Hearing Sessions in early 2024 based on the information and circumstances at the time of the Hearings. Whilst it is acknowledged that the services and facilities recorded for the settlements may have altered since the submission of the Plan and the Hearing sessions, the principle of their identification has already been agreed and does not form part of this consultation. It should be noted that the town council are undertaking a neighbourhood plan through which they, amongst other ambitions aim to influence the direction of planning to achieve a balance of housing that provides for a wide range of ages and incomes and maintain a sense of community, sustain the local economy and maintain and improve access to the countryside. These aims and ambitions are commensurable with the strategic designation of being a small growth village.
Section	General Comments (including those not directly relating to a Proposed Change as set out in the Further Consultation)
ID	FC408
Response Date	17/12/2024 14:07:00
Full Name	Mr David Dewbery
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILES</p> <p>Including site C19/2 as an allocation in the Local Plan will ensure that it is positively prepared as it will provide for the delivery of market and affordable housing to meet the Council's objectively assessed needs at a sustainable location affording opportunities for sustainable and active travel at an identified growth location in accordance with the spatial strategy of the emerging Local Plan.</p> <p>The allocation of C19/2 is justified as the site is identified in the Sustainability Appraisal addendum as scoring at least as well as other sites proposed to be allocated or extended at Cromer.</p> <p>The allocation of C19/2 is effective as the site is deliverable over the plan period and can contribute to the authority's five-year supply on adoption of the Local Plan.</p>

The allocation of C19/2 is consistent with national policy as it enables the delivery of sustainable development at a sustainable location in accordance with the policies of the National Planning Policy Framework.

Site C19/2 Land at Compitt Hills Cromer is listed at Table 3 p.52 of Exam Doc FC00I(b) with an area of 4.96ha, a capacity of 100 dwellings but as not being

"suitable" or "deliverable within 5 years". The current status column states;

"The site was discounted from the site assessment process, but a smaller portion of the site could be considered suitable for development pending appropriate mitigation to constraints."

Paragraph 3.16 p.61 of Exam Doc FC00I(b) states that the site was originally discounted from the plan owing to concerns over access onto Roughton Road and impact on the wider landscape. The paragraph continues stating that the Highways Authority consider that "an acceptable solution to providing safe access onto Roughton Road cannot be realistically achieved and therefore, the site cannot be considered as a proposed allocation".

The local authority have previously been provided with correspondence from the Highway Authority (Appendix 1) which states that the site could accommodate up to 100 dwellings subject to appropriate mitigation.

Highways drawings which address the Highways Authority's mitigations requirements to evidence that a safe access can be achieved onto Roughton Road have also been previously provided to the local planning authority (Appendix 2).

My understanding is that it still remains possible to achieve a safe access to Roughton Road as shown at Appendix 2.

Appendix 1 - Email from Liz Pole dated 11.08.21 stating that up to 100 dwellings could be accommodated at the site.

Appendix 2 - Engineering Drawings prepared by Create previously submitted to North Norfolk District Council which demonstrate that the County's concerns can be adequately addressed.

The Sustainability Appraisal Addendum at Appendix 5 of Exam Doc FC00I(b) considers site C19/2 at Appendix C (p.304). The overall conclusion for the site is positive. With the site scoring 13 '+' scores and just 3 '-' scores. This is either the same or better than the other sites being put forward in Cromer in this consultation.

A Preliminary Ecological Appraisal Report has been prepared for the site by Wild Frontiers Ecology (Oct 24) and is attached at Appendix 3. A site survey found no signs of protected species at the site and the report concluded that development of the site would present the opportunity for ecological enhancements.

Points I wish to make to support further consideration of my site include the following;

- The Inspector has made it clear that the emerging Local Plan needs to find additional land for housing and has increased the number of dwellings to be planned for.
- Cromer is one of three growth locations in the emerging Local Plan so is a suitable location for new housing.
- The Inspector has already accepted that development in the National Landscape is necessary to allow for new housing growth at Cromer.
- The local authority accept at Exam Doc EH006 (g) (p.353) that draft allocation CO7/2 will not deliver in the plan period.
- Draft allocation C16 has been consented for less dwellings than it's dra allocation, (118 rather than 150) and is now a commitment.
- Cromer is therefore down on proposed housing allocations before the increase in numbers requested by the Inspector are taken into account.
- Site C19/2 can deliver up to 100 new homes, including affordable housing.
- Site C19/2 is situated in very close proximity to Roughton Road train station and a bus service runs along Roughton Road allowing for choices around alternative modes of transport to the private car in close proximity to the site. Roughton Road also allows for choices around active travel, i.e walking and cycling into Cromer.
- Site C19/2 is located close to Cromer Academy and Cromer Infant and Junior School allowing for walking and cycling to education facilities.
- The County Council have not stated why an adequate access onto Roughton Road cannot be realistically achieved.

I trust the above points will be taken into consideration moving forward.

I consider that Site C19/2 is suitable, it is available, and it is deliverable in the plan period. It is not subject to any heritage, landscape, ecological or highways constraints greater than those sites that have already been allocated in Cromer.

As a relatively small site that can be accessed from the existing Compit Hills cul-desac it could be delivered quickly and assist the authority with their five-year housing land supply in accordance with the National Planning Policy Framework.

Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	In order to be able to answer any questions or queries the Inspector or others may have on these representations and to participate in the debate with regard to the location of new housing growth at Cromer.
Include files	David Dewbery Appendix 1.pdf David Dewbery Appendix 2.pdf David Dewbery Appendix 3.pdf
Officer Summary	<p>Proposing Alternative Site:</p> <p>Including site C19/2 as an allocation in the Local Plan will ensure that it is positively prepared as it will provide for the delivery of market and affordable housing to meet the Council's objectively assessed needs at a sustainable location affording opportunities for sustainable and active travel at an identified growth location in accordance with the spatial strategy of the emerging Local Plan.</p> <p>The allocation of C19/2 is justified as the site is identified in the Sustainability Appraisal addendum as scoring at least as well as other sites proposed to be allocated or extended at Cromer. The allocation of C19/2 is effective as the site is deliverable over the plan period and can contribute to the authority's five-year supply on adoption of the Local Plan.</p> <p>The local authority have previously been provided with correspondence from the Highway Authority (Appendix 1) which states that the site could accommodate up to 100 dwellings subject to appropriate mitigation. Highways drawings which address the Highways Authority's mitigations requirements to evidence that a safe access can be achieved onto Roughton Road have also been previously provided to the local planning authority (Appendix 2).</p> <p>Appendix 1 - Email from Liz Pole dated 11.08.21 stating that up to 100 dwellings could be accommodated at the site.</p> <p>Appendix 2 - Engineering Drawings prepared by Create previously submitted to North Norfolk District Council which demonstrate that the County's concerns can be adequately addressed.</p> <p>The Sustainability Appraisal Addendum at Appendix 5 of Exam Doc FC001(b) considers site C19/2 at Appendix C (p.304). The overall conclusion for the site is positive. With the site scoring 13 '+' scores and just 3 '-' scores. This is either the same or better than the other sites being put forward in Cromer in this consultation.</p> <p>As a relatively small site that can be accessed from the existing Compit Hills cul-desac it could be delivered quickly and assist the authority with their five-year housing land supply in accordance with the National Planning Policy Framework.</p>
Officer Response	<p>Comments noted. Proposal for alternative site is acknowledged. The Council has engaged with the Highway Authority throughout the additional sites review process and throughout the Local Plan process as a whole and as a result of discussions relating to this consultation, the Highway Authority confirmed that vehicular access onto Roughton Road from is unsuitable and not supported. Therefore, no vehicular access is being proposed onto Roughton Road from either proposed allocation in the Plan. Appendix 1 attached to this representation includes commentary from the Highway Authority however, this is dated 2021, only pertains specifically to the access point into the site from Roughton Road and does provide commentary on the entire road's suitability, and does not pertain to this consultation where the Council approached the Highway Authority and it was confirmed, that no development should allow access onto Roughton Road.</p> <p>The Council is consulting on a range of sites which have been assessed as suitable for development in order to meet the identified shortage in housing provision in the Draft Plan and provide further choice and flexibility in the delivery of new housing. The Council are not considering additional sites to those proposed in this consultation at this time.</p>
Section	General Comments (including those not directly relating to a Proposed Change as set out in the Further Consultation)
ID	FC437
Response Date	19/12/2024 09:16:00
Full Name	Matthew Thomas
Organisation	Bullen Developments Ltd
Agent Full Name	Matthew Thomas

Agent Organisation	CODE Development Planners
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILES</p> <p>Introduction</p> <p>This response to the North Norfolk Further Consultation has been prepared by CODE Development Planners (hereafter referred to as 'CODE') on behalf of Bullen Developments Ltd.</p> <p>Inspector David Reed wrote to North Norfolk District Council on 24 May 2024, and subsequently on 30 August 2024 setting out the main soundness issues raised by the plan and to seek the views of the council on how these might be addressed. The Inspector identified three main issues:</p> <ul style="list-style-type: none"> • Shortfall in housing provision • Spatial strategy: Small Growth Villages • Gypsy, traveller and travelling show people's accommodation <p>The purpose of the consultation is to seek feedback on NNDC's proposed changes to the submitted North Norfolk Local Plan intended to respond to the three main issues raised by the Inspector. This representation responds to the issue of the shortfall in housing provision and NNDC's proposed response.</p> <ul style="list-style-type: none"> • Shortfall in housing provision <p>In paragraph 47 of his letter on 25 May 2024 the Inspector identifies a shortfall in housing provision for around 700 homes but notes this does not allow any contingency for unforeseen events such as further slippage of larger allocations, the non-implementation of smaller allocations, the small growth villages policy not working as intended or insufficient windfall sites coming forward. The Inspector advises then that provision for an additional 1,000 dwellings above the current figures shown in the submitted plan to allow some flexibility and contingency.</p> <p>The Inspector offered support to NNDC, in that the numerous settlements and extensive countryside provides enough space for windfall development to come forward and the Council's revised estimate of an additional 495 dwellings from this source over the plan period can go some way to filling the gap. The Inspector added that excessive reliance on unspecified windfall sites adds uncertainty to the plan and more concrete steps need to be taken to bring forward more housing in the plan period, particularly in the early years.</p> <p>In offering guidance to NNDC the Inspector stated the options available to NNDC include, and there may be others:</p> <ol style="list-style-type: none"> 1 Additional or extended allocations in large and small growth towns and large growth villages in accordance with the spatial strategy and settlement hierarchy of the plan. Whilst further sites in Fakenham and North Walsham should not be ruled out, they may divert some demand from the large-scale developments already proposed for these towns. 2 Increasing the expansion of small growth villages above 6%. 3 Expansion of the list of small growth villages to include those with a single key service or (say) three secondary/desirable services. As document EX034(a) demonstrates, there are numerous villages with a primary school, convenience shop or other services that are sufficiently nucleated in form to allow for a coherent settlement boundary which are not currently included. 4 Inclusion of a new policy allowing sensitive infilling and rounding off in small villages and hamlets without a settlement boundary (Breckland Local Plan Policy HOU05 is an example in an area with a similarly dispersed settlement pattern). Alternatively, settlement boundaries could be defined but without any provision for development beyond the boundary. 5 If the allocation in the Wells Neighbourhood Plan at Two Furlongs Hill is included in the finalised plan the proposed 45 dwellings could be included in the future supply. <p>As a result of the Inspector's suggestions NNDC propose additional allocations (new and extended) to deliver approximately 850 additional dwellings and changes to the settlement hierarchy to include additional small growth villages with an increased growth allowance of 9% to deliver an additional 451 dwellings.</p> <p>Paragraph 1.3.3 of the North Norfolk Local Plan Examination Further Consultation document explains 'a number of other sources of additional dwelling supply are expected to further increase the overall forecasted delivery of housing across the plan period as detailed in the Inspector's letter and subsequent correspondence with NNDC. These additional changes are not part of the consultation but are expected to form part of the anticipated Main Modifications publication, following any further hearing sessions.'</p> <p>Whilst we acknowledge the consultation's reference to future Main Modifications this representation seeks to highlight an additional complementary option to support increased housing numbers to those suggested by the Inspector, specifically a review and amendment</p>

to the settlement boundary of Fakenham to include the constituent part of Hempton which we contend functions as part of Fakenham. The council will recall that during the relevant Matter 5 hearing session on 14 February 2024 the council's planning witness, Mark Ashwell accepted our client's representations that the northeastern most developed area of Hempton abutting the settlement boundary of Fakenham is functionally and visually part of the town of Fakenham. Mr Ashwell suggested that a more appropriate boundary to that promoted by our clients at the examination might be more tightly drawn around the immediately adjacent built-up areas of Hempton and excluding the more open areas to the west. As a consequence of this discussion, CODE submitted on 15 February 2024 a new plan as an alternative to that previously submitted which reflected the view expressed by Mr Ashwell. We attach a copy of the revised plan and accompanying email.

Importantly in respect to the need to increase housing numbers, an extended settlement boundary as suggested on the attached plan would include two previously developed but currently vacant sites of 0.27ha and 0.61 ha suitable for accommodating a total of approximately 35 new dwellings.

Hempton and Fakenham

Policy SS1: Spatial Strategy of the North Norfolk Local Plan (Submission Version) seeks to direct a majority of new development in the larger towns and villages in the district having regard to their role as employment, retail and service centres. Development within the defined settlement boundaries will be permitted subject to compliance with the remaining plan policies.

Fakenham is classified as a Larger Growth Town in the settlement hierarchy and together with North Walsham and Cromer is expected to deliver a significant proportion of the new growth that is required in the district. As set out in our matter 5 statement there is a part of Hempton (east of the A1065) that is immediately adjacent to Fakenham and has direct and easy pedestrian and cycle access to the services and facilities provided by the town.

The stated Vision for North Norfolk at page 19 and the Strategic Aims and Objectives at page 20 of the Submitted Plan set out the policy function of the Settlement Boundary of Fakenham and include:

- *'The towns of North Walsham, Fakenham and Cromer will have been the focus for a significant proportion of the required development.....'*
- *'The necessary infrastructure and community facilities/services will be in place to support this growth.'*
- *'Focussing larger scale development into areas where services will be available, where facilities can be supported and where new development encourages use of a choice of sustainable travel modes'*

These references, together with the justification provided for draft site allocations elsewhere, emphasise the policy function of Settlement Boundaries to define the areas in which development should be concentrated with sustainable access to a range of facilities/services, where there is a level of identified need and where growth is not constrained by physical or policy constraints (reference paragraph 2.4 of Background Paper 2 'Distribution of Growth' (ELDoc C2)).

Currently Hempton is designated as part of the countryside and dismissed as being a suitable location for development when considered against the policy function of the settlement boundary. As set out in our matter 5 hearing statement, and expressed at the hearing session on 14 February 2024, we contend that given the close functional and spatial relationship between the two settlements, Hempton (or at least the east of the 1065) should be considered as part of Fakenham and included within the settlement boundary.

As described above in paragraph 2.6 CODE has prepared a proposed amendment to the settlement boundary of Fakenham, reflective of the hearing session discussions on open space and character change, to include that area of Hempton that benefits from the close relationship with Fakenham.

Whilst we appreciate the Inspector's comments that an over reliance on windfall proposals can add uncertainty to the plan, ensuring the proposed settlement boundaries include the district's most sustainable areas increases the opportunity for appropriately located windfall development to come forward. Development is permitted within the settlement boundary subject to compliance with the other policies within the plan and supports the overarching aim of delivering sustainable development.

CODE would reiterate our view that in failing to properly assess and designate Hempton, the Local Plan 2016-2036 cannot be found to comply fully with the tests of soundness as described in the NPPF. The countryside designation cannot be considered justified through a failure to properly assess Hempton and the reasonable alternative sites within the plan area. In failing to properly consider Hempton and the constituent part directly adjacent to the settlement boundary of Fakenham the plan is not consistent with national policy aims of delivering sustainable development, particularly on well-located brownfield sites.

<p>Do you consider it necessary to participate in a public hearing session, should these be required?</p>	<p>Yes</p>
<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>Include files</p>	<p>241219 FIN_FrthrCnsltRspns.pdf 240215 TheGrvAltPln.pdf</p>
<p>Officer Summary</p>	<p>Inspector David Reed wrote to North Norfolk District Council on 24 May 2024, and subsequently on 30 August 2024 setting out the main soundness issues raised by the plan and to seek the views of the council on how these might be addressed. This representation responds to the issue of the shortfall in housing provision and NNDC's proposed response.</p> <p>In paragraph 47 of his letter on 25 May 2024 the Inspector identifies a shortfall in housing provision for around 700 homes but notes this does not allow any contingency for unforeseen events... the Inspector advises then that provision for an additional 1,000 dwellings above the current figures shown in the submitted plan to allow some flexibility and contingency.... and the Council's revised estimate of an additional 495 dwellings from this source over the plan period can go some way to filling the gap.</p> <p>In offering guidance to NNDC the Inspector stated the options available to NNDC include: additional site allocations/ extensions in accordance with the spatial strategy, increasing the SGV allowance, expanding the number of SGVs, inclusion of infill and rounding off in small villages and the inclusion of Wells NP allocation site in the trajectory. As a result of the Inspector's suggestions NNDC propose additional allocations (new and extended) to deliver approximately 850 additional dwellings and changes to the settlement hierarchy to include additional small growth villages with an increased growth allowance of 9% to deliver an additional 451 dwellings.</p> <p>Paragraph 1.3.3 of the Further consultation material ref a number of other sources are expected to further the additional supply and these are not part of the further consultation but expected to be part of the anticipated main modification consultation.</p> <p>Whilst we acknowledge the consultation's reference to future Main Modifications this representation seeks to highlight an additional complementary option to support increased housing numbers to those suggested by the Inspector, specifically a review and amendment to the settlement boundary of Fakenham to include the constituent part of Hempton which we contend functions as part of Fakenham.</p> <p>The council will recall that during the relevant Matter 5 hearing session on 14 February 2024 the council's planning witness, Mark Ashwell accepted our client's representations that the northeastern most developed area of Hempton abutting the settlement boundary of Fakenham is functionally and visually part of the town of Fakenham. Mr Ashwell suggested that a more appropriate boundary to that promoted by our clients at the examination might be more tightly drawn around the immediately adjacent built-up areas of Hempton and excluding the more open areas to the west. As a consequence of this discussion, CODE submitted on 15 February 2024 a new plan as an alternative to that previously submitted which reflected the view expressed by Mr Ashwell. We attach a copy of the revised plan and accompanying email. Importantly in respect to the need to increase housing numbers, an extended settlement boundary as suggested on the attached plan would include two previously developed but currently vacant sites of 0.27ha and 0.61 ha suitable for accommodating a total of approximately 35 new dwellings.</p> <p>Policy SS1: Spatial Strategy of the North Norfolk Local Plan (Submission Version) seeks to direct a majority of new development in the larger towns and villages in the district having regard to their role as employment, retail and service centres.</p> <p>Fakenham is classified as a Larger Growth Town in the settlement hierarchy and together with North Walsham and Cromer is expected to deliver a significant proportion of the new growth that is required in the district. As set out in our matter 5 statement there is a part of Hempton (east of the A1065) that is immediately adjacent to Fakenham and has direct and easy pedestrian and cycle access to the services and facilities provided by the town. Currently Hempton is designated as part of the countryside and dismissed as being a suitable location for development when considered against the policy function of the settlement boundary. As set out in our matter 5 hearing statement, and expressed at the hearing session on 14 February 2024, we contend that given the close functional and spatial relationship between the two settlements, Hempton (or at least the east of the 1065) should be considered as part of Fakenham and included within the settlement boundary.</p> <p>CODE has prepared a proposed amendment to the settlement boundary of Fakenham, reflective of the hearing session discussions on open space and character change, to include that area of Hempton that benefits from the close relationship with Fakenham.</p>

	<p>Whilst we appreciate the Inspector's comments that an over reliance on windfall proposals can add uncertainty to the plan, ensuring the proposed settlement boundaries include the district's most sustainable areas increases the opportunity for appropriately located windfall development to come forward. Development is permitted within the settlement boundary subject to compliance with the other policies within the plan and supports the overarching aim of delivering sustainable development.</p>
Officer Response	<p>Comments noted. The comment does not relate to any of the modifications proposed and largely reiterates points already examined and/or relates to policies or matters which do not form part of this consultation.</p> <p>The matter of a boundary amendment at Fakenham was discussed at the earlier hearings. The council's recollection is that no conclusion was reached at the time and the council have not been asked to review or propose a modification.</p> <p>Commentary on Fakenham from the Inspector is included in the Inspectors initial letter of May 2024 in para 26 – 28. The spatial strategy and the identification of and suitability of the approach set out across large growth villages down to small growth villages and which sees growth directed to larger towns with successively lower levels of growth towards lower tiers with fewer services and facilities is detailed as being justified in paragraph 16. The council awaits the inspectors considered feedback on the proposed draft modifications schedule which incorporate and consolidates those modifications discussed and agreed through the examination and hearings to date.</p>
Section	General Comments (including those not directly relating to a Proposed Change as set out in the Further Consultation)
ID	FC440
Response Date	18/12/2024 21:10:00
Full Name	Mrs Gemma Harrison
Organisation	Holt Town Clerk Holt Town Council
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Holt Town Council would like to submit further comments to the Local Plan Consultation and bring the Inspectors attention to a new parcel of land which has come forward for development in Holt.</p> <p>The land is situated off Cley Road and has had a number of site assessments carried out by the developer of the site. Holt Town Council supports the inclusion of the site as it looks to incorporate a much-needed cemetery extension.</p> <p>The current Holt Cemetery on Cley Road will be full within 8-10 years based on current burial rates. A recent consultation carried out by the Town Council has demonstrated a high future need for burial space in Holt.</p> <p>Cllrs would be grateful if this could be considered as part of the Emerging Plan as the plan would be the ideal mechanism to deliver not only housing for Holt but the community benefit of burial space. The opportunity for this to be explored further would be welcomed by Cllrs.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	

Officer Summary	<p>Holt Town Council would like to submit further comments to the Local Plan Consultation and bring the Inspectors attention to a new parcel of land which has come forward for development in Holt.</p> <p>The land is situated off Cley Road and has had a number of site assessments carried out by the developer of the site. Holt Town Council supports the inclusion of the site as it looks to incorporate a much-needed cemetery extension.</p> <p>The current Holt Cemetery on Cley Road will be full within 8-10 years based on current burial rates.</p> <p>A recent consultation carried out by the Town Council has demonstrated a high future need for burial space in Holt.</p> <p>Cllrs would be grateful if this could be considered as part of the Emerging Plan as the plan would be the ideal mechanism to deliver not only housing for Holt but the community benefit of burial space. The opportunity for this to be explored further would be welcomed by Cllrs.</p>
Officer Response	<p>No site details are provided in relation to the support being expressed for a further potential development site off Cley Road. It's understood that the town council has been in discussions with the promoters/landowner as part of a potential revised neighbourhood plan and potential site allocation(s) to help fulfil the town councils desire to plan for a future anticipated expansion of the adjacent burial site. No prior contact has been made with the council or pre application advice sought in relation to the suitability of the proposal.</p> <p>The Council is not currently in a position to review new site submissions at this stage of the Local Plan and has not undertaken a "call for sites "The approach set out in order to address the identified shortfall identified during the previous hearings and examination time line timeline now set out by Government is set out in appendix 1 to this consultation and is based upon a review of sites already considered suitable but previously not required.</p> <p>It is not possible to identify the specific site from the information provided however in relation to previous sites assessed adjacent to Cley Rd and as detailed in the site assessment background paper [D4] Highways have confirmed that although site access may be achievable onto Cley Rd such access from Cley Road is considered unacceptable by Highways owing to the impact that development traffic would have on the wider highway network, particularly, the New Street/High Street Junction. Highways suggest that owing to the constrained nature of the road network, in the historic heart of the town, it is not possible to provide the mitigation or interventions required to improve the road junctions. As such previous sites were considered not suitable at the time in this location. Many of the potential sites outside the development boundary in this area also fall under the national Landscape designations (former AONB) and development could be highly visible in the landscape. Careful attention would have to be given to scale and location as well as the availability and suitability of other potential sites in any assessment.</p>
Section	General Comments (including those not directly relating to a Proposed Change as set out in the Further Consultation)
ID	FC442
Response Date	18/12/2024 20:54:00
Full Name	Gemma Harrison
Organisation	Clerk High Kelling Parish Council
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>Cllrs have met to discuss the proposals and the impact they will have on High Kelling and strongly object to High Kelling being given status as a Growth Village and objects to the 20 new homes allocated.</p> <p>High Kelling lies on the busy A148, the busy road segregates the village making accessing facilities either side difficult. Access onto and from the A148 in a vehicle is problematic and a source of many complaints, accidents and near misses. Speeding is an issue, drivers seem unaware of the nearby houses, footpaths and bus stops and as such the Parish Council have been proactive in setting up a speed watch group, and lobbying Norfolk County Council to provide better signage and financial support towards further speed monitoring. Further development proposals are always heavily scrutinised by Highway Officers and often struggle to gain planning consent due to Highway concerns. Any new development in the parish therefore would require a transport assessment to better understand the impact additional vehicle movements may bring to the area. Transport assessments have not been carried out here and as such there is no evidence for Cllrs to consider.</p> <p>Furthermore, when houses have been developed and put up for sale in recent years, such as the Warren Farm development, they have not sold. Instead, the owner has been forced</p>

	<p>to rent the properties out. This leads Cllrs to believe that there isn't the need for new housing in High Kelling, Cllrs do believe there is a need for affordable housing in High Kelling and feel a small exception housing site may be more beneficial.</p> <p>Cllrs disagree with the Growth Village Status as High Kelling has limited services which are all located nearer to Holt and away from the village centre. The services are not easily accessible by foot and therefore would encourage further car use. Cllrs have concerns about the capacity of the sewage network and have not seen any evidence that this has been assessed as part of the allocation process. Cllrs feel this element of the plan is unsound and object to High Kelling being included as a Growth Village as transport connectivity remains a huge concern for Cllrs and no evidence has been produced by the council to alleviate these concerns. Any new development in High Kelling is likely to have a severe detrimental impact on the Highway network.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	<p>Object: Councillors strongly object to High Kelling being given Small Growth Village status and objects to the 20 new homes allocated.</p> <p>Concerns about the impact further development would place on the busy A148 road. Proposals are always heavily scrutinised by Highway Officers and often struggle to gain planning consent due to Highway concerns. Any new development in High Kelling is likely to have a severe detrimental impact on the highway network. A transport assessment is required, which has not been carried out here, to better understand the impact additional vehicle movements may bring to the area. As such there is no evidence for Councillors to consider.</p> <p>Local experiences, for example, the Warren Farm development where properties did not sell, leads Councillors to believe there isn't the need for new housing in High Kelling, but there is a need for affordable housing in High Kelling and feel a small exception housing site may be more beneficial.</p> <p>High Kelling has limited services which are all located nearer to Holt and away from the village centre. The services are not easily accessible by foot and therefore would encourage further car use. Councillors have concerns about the capacity of the sewage network and have not seen any evidence that this has been assessed as part of the allocation process. Cllrs feel this element of the plan is unsound and object to High Kelling being included as a Growth Village as transport connectivity remains a huge concern for Cllrs and no evidence has been produced by the council to alleviate these concerns. Any new development in High Kelling is likely to have a severe detrimental impact on the Highway network.</p>
Officer Response	<p>Comments noted - Disagree: The selection of all of the identified towns and villages within Policy SS1 Spatial Strategy, has followed a consistent methodology as detailed in Background Paper 2 Distribution of Growth [Examination ref C2]. The justification and principle for each of the submitted settlements, including High Kelling, were agreed at the Hearing Sessions in early 2024 based on the information and circumstances at the time of the Hearings and the village's identification as a small growth village is not part of this further consultation. The proposed increase from 6% to 9% growth for High Kelling gives an indicative housing allowance of 20 dwellings. For information, in their consultation response Anglian Water confirmed High Kelling as having available dry weather flow headroom to accommodate the proposed additional wastewater flows. As part of the consultation feedback, Norfolk CC as the Highway Authority has confirmed that they have no objection to the increase in growth from 6% to 9% in all Small Growth Villages as stated in Proposed Change 13. Any site-specific transport assessments would be carried out at the planning application stage. The policies of the local plan allow for growth in relation to exception sites and the council through its affordable housing enabler are actively pursuing suitable sites. Additional sites for affordable housing can come forward at any time in line with Policy HOU3 Affordable Homes in the Countryside (Rural Exceptions Housing).</p> <p>The Local Plan must set out an appropriate framework to deliver the growth that is necessary to meet the Districts existing and future identified needs for all types of development. Any development proposals will also have to accord with Policy HOU2 which sets out the required market and affordable housing mix and is aligned with the level of needs to ensure that the type, size and tenure of homes provided closely matches the existing and predicted future needs of the local population.</p>

Section	General Comments (including those not directly relating to a Proposed Change as set out in the Further Consultation)
ID	FC488
Response Date	18/12/2024 17:59:00
Full Name	James Brooke
Organisation	
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTCHED FILE</p> <p>We represent the owner of the land shown on the attached plan.</p> <p>In the existing Local Plan the land is allocated for Employment uses. We wish it to be considered in the currant Local Plan Further Consultation for a mixed use scheme that retains the opportunity for employment uses whilst allowing for an appropriate residential allocation.</p> <p>We would be willing to participate in a public hearing session should it be required and to explain /answer questions from an inspector or others may have about our clients site and to debate about housing and employment opportunities and allocations in Stalham.</p> <p>We attach a layout which demonstrates the ability to retain some employment uses whilst providing 42 residential units of mixed scale ranging from 2-4 bedroom units and it would be proposed that some would be bungalows. The owner who has a track record of development in the district would intend to develop the site.</p> <p>The employment would be targeted at starter business from within the locality and the suggested scale of the units is designed to accommodate that.</p> <p>The owner has engaged with a well-established Social housing provider very familiar to the Authority to take over the ten affordable units who are keen to develop appropriate accommodation to meet the local need.</p> <p>The layout provides for a comprehensive landscaping scheme, no direct access onto the A149,an upgrading of the Weavers Way to ensure secure pedestrian and cycle access directly to the centre of Stalham and a suitable screen along the A149 to buffer the impact of the road on the site. The layout of the residential units has been designed to minimise the impact of the road on the residential units with only 4 units close to the A149 boundary.</p> <p>The owners will be in a position to provide land for all environmental mitigation schemes and it would be intended that the BNG requirements will be provided within the site and Nutrient Neutrality mitigation provided on retained land in close proximity.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	SKM_C250i24121817010.pdf
Officer Summary	<p>We represent the owner of the land shown on the attached plan. In the existing Local Plan, the land is allocated for Employment uses. We wish it to be considered in the current Local Plan Further Consultation for a mixed-use scheme that retains the opportunity for employment uses whilst allowing for an appropriate residential allocation.</p> <p>The proposal is for 42 residential units and the employment would be targeted at starter business from within the locality and the suggested scale of the units is designed to accommodate that. The owner has engaged with a well-established Social housing provider very familiar to the Authority to take over the ten affordable units who are keen to develop appropriate accommodation to meet the local need. The owners will be in a position to provide land for all environmental mitigation schemes, and it would be intended that the BNG requirements will be provided within the site and Nutrient Neutrality mitigation provided on retained land in close proximity.</p>
Officer Response	<p>Comments noted- no site details or references are provided though it is thought the site relates to land adjacent to the A149 / B1159 at Stalham which is in part currently allocated as an employment site reference E12. The site was also assessed as part of the emerging local plan for employment and residential under E12, ST16 and HE0110 and was discounted from further consideration due to a number of constraints being identified including landscape</p>

	<p>impact, and it not being identified as deliverable with no promotion of the since the previous plan and through the Local Plan process.</p> <p>Site selection follows a set methodology based around suitability, deliverability and availability. Background paper 6, examination reference C6 sets out the approach to site assessment and selection, while the site assessment booklet for Stalham sets out the detailed assessments – examination reference D7.</p> <p>The Council is not currently in a position to review new site submissions at this stage of the Local Plan and has not undertaken a “call for sites “The approach set out in order to address the identified shortfall in the EIP timeline expected is set out in appendix 1 to this consultation and is based upon a review of sites already considered suitable but previously not required.</p> <p>With the site currently being allocated the council offer a pre application advice service</p>
Section	General Comments (including those not directly relating to a Proposed Change as set out in the Further Consultation)
ID	FC498
Response Date	18/12/2024 13:03:00
Full Name	
Organisation	Glavenhill Strategic Land
Agent Full Name	Mr Philip Atkinson
Agent Organisation	Director Lanpro Services
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>My client Glavenhill Ltd wishes to make the following representations [see responses FC490, FC491, FC492, FC493, FC494] in the form of support, objection and comment to the above Further Consultation document (and related background papers) that are designed to address the Planning Inspector's interim findings and concerns in respect of housing delivery (and other issues) within the District as advised on the 24th May 2024. My client supports the need to achieve an increased overall new housing need figure rising from 391 to (557 + 5% buffer) dwellings per annum over the emerging Local Plan period to meet housing needs in the District.</p> <p>The need to achieve high and effectively levels of housing land supply and delivery in the District is reinforced by the reintroduction of the standard method and other delivery tests in the new National Planning Policy Framework that are relevant to the new Local Plan and will likely require an immediate further Local Plan review after the 13th March 2025.</p> <p>In this respect my client is seriously concerned regarding the effectiveness of planned housing delivery with the District to meet increased future housing targets especially given the re-introduced standard method contained in the emerging new National Planning Policy Framework document that will increase the housing supply figure still further over the emerging Local Plan period.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	My client would respectfully request that we are able to attend the reconvened Examination in Public to discuss the matters raised in this representation
Include files	
Officer Summary	<p>My client Glavenhill Ltd wishes to make the following representations [see responses FC490, FC491, FC492, FC493, FC494] in the form of support, objection and comment to the above Further Consultation document (and related background papers) that are designed to address the Planning Inspector's interim findings and concerns in respect of housing delivery (and other issues) within the District as advised on the 24th May 2024.</p> <p>My client supports the need to achieve an increased overall new housing need figure rising from 391 to (557 + 5% buffer) dwellings per annum over the emerging Local Plan period to meet housing needs in the district.</p> <p>The need to achieve high and effectively levels of housing land supply and delivery in the district is reinforced by the reintroduction of the standard method and other delivery tests in</p>

	<p>the new National Planning Policy Framework that are relevant to the new Local Plan and will likely require an immediate further Local Plan review after the 13th March 2025.</p> <p>In this respect my client is seriously concerned regarding the effectiveness of planned housing delivery with the district to meet increased future housing targets especially given the re-introduced standard method contained in the emerging new National Planning Policy Framework document that will increase the housing supply figure still further over the emerging Local Plan period.</p>
Officer Response	<p>Support for higher figures noted The Plan is being examined under the previous September 2023 NPPF under transitional arrangements. It is expected that the adopted plan will be reviewed in line with paragraph 34 of the December 2024 NPPF and reviews completed every 5 years from adoption and earlier in regard to relevant national policy changes such as if their applicable local housing need figure has changed significantly. Given the plan was submitted prior to 12th March 2025 paragraph 236 applies, and it is expected that the LPA will begin work on a new plan, under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (as soon as the relevant provisions are brought into force in 2025), in order to address the shortfall in housing need.</p>
Section	General Comments (including those not directly relating to a Proposed Change as set out in the Further Consultation)
ID	FC503
Response Date	19/12/2024 16:41:00
Full Name	Chris Waldron
Organisation	Assistant Safeguarding Manager Ministry Of Defence (Safeguarding)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILE
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	20241107_MOD_Response.pdf
Officer Summary	<p>The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. Paragraph 102 of the National Planning Policy Framework (December 2024) requires that planning policies and decisions take into account defence requirements by ‘ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.’</p> <p>The area covered by any North Norfolk Local Plan will both contain and be washed over by statutory safeguarding zones that are designated to preserve the operation and capability of defence assets and sites including RAF Neatishead, RAF Weybourne, RAF Trimingham and the Eastern 2 WAM (Wide Area Multilateration) Network.</p> <p>The review or drafting of planning policy provides an opportunity to better inform developers of the statutory requirement that MOD is consulted on development that triggers the criteria set out on Safeguarding Plans, and the constraints that might be applied to development as a result of the requirement to ensure defence capability and operations are not adversely affected.</p> <p>Where development falls outside designated safeguarding zones the MOD may have an interest where development is of a type likely to have any impact on operational capability. Usually this will be by virtue of the scale, height, or other physical property of a development.</p> <p>A number of the sites allocated in the Proposed Changes to the North Norfolk Local Plan fall within statutory safeguarding zones of Trimingham and RAF Neatishead technical safeguarding zones:</p>

	Proposed change 2,3,4,5,6,7,10 and 11 – advice is given that Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement.
Officer Response	Statutory consultation requirements at application stage are noted and will be dependent on the scale and height of any specific proposal.
Section	General Comments (including those not directly relating to a Proposed Change as set out in the Further Consultation)
ID	FC506
Response Date	18/12/2024 16:19:00
Full Name	
Organisation	Larkfleet Group
Agent Full Name	Ms Beccy Rejzek
Agent Organisation	Lanpro Services
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILE
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	Representation Letter on behalf of Larkfleet Group 18122024.pdf
Officer Summary	<p>I am pleased to submit representations on behalf of Larkfleet Group to the above consultation. Larkfleet has not participated to date in the North Norfolk Local Plan process but has recently acquired an interest in land at Cley Road, Holt adjacent to the town cemetery. This site is identified in the Site Assessment (Regulation 19) as Site H16 in Holt and has not been selected as a preferred site for residential allocation.</p> <p>Larkfleet Group has had recent discussions with Holt Town Council regarding the site. The Town Council own and manage the adjacent town cemetery and are concerned that this is nearing capacity. There is a need to identify an extension site so that development of new cemetery land can take place in time to receive cremations and burials when the existing site reaches capacity. Larkfleet has offered to provide extension land for the cemetery in conjunction with housing development in the range 50-60 dwellings. An indicative scheme has been presented to the Town Council (see Appendix 1) which voted in support of the plan at the Town Council meeting held 14th October 2024 and provided written confirmation of support, and need for the cemetery extension by letter dated 14th November 2024 (See Appendix 2)</p> <p>The indicative plan showing the proposal for the cemetery extension in conjunction with housing development at Cley Road was shared with North Norfolk District Council in October 2024 following the publication of the Inspector's Interim findings (Document Reference EH006 (f)) with the offer of further discussions regarding potential allocation of the site to help assist in meeting the identified shortfall in housing numbers, as well as helping to meet cemetery need in Holt. A Phase 2 Site Investigation was also submitted confirming the suitability of the land for cemetery use and a Flood Risk Assessment which confirmed the site is at low risk of flooding. However, officers advised by email that at this time, the site is not considered to be an appropriate addition to the list of additional allocations.</p> <p>The Council have chosen to expand the list of small growth villages in accordance with this option, (as detailed in the inspector's letter EH006f). Whilst some of these villages may be capable of accommodating limited additional growth, it is noted that settlements such as Tunstead, where 42 dwellings are now proposed to be built, have requested to be removed from the list by the Parish Council. It is suggested that proposed housing in these locations where there is concern by the Parish Council that the facilities and services are not sufficient to meet the criteria for designation as a small growth village, and there is a corresponding lack of support, could be replaced by allocation of 50-60 dwellings at Site H16, Cley Road, Holt, where there is support for development from the Town Council.</p>

	<p>As currently drafted the Further Consultation document is not considered to meet the soundness tests for local plans. The identification of certain additional small growth villages where there is a lack of support from Parish Councils and a lack of evidence that they meet the criteria for designation confirms that the plan is not justified in its approach and is not the most appropriate strategy when considered against the reasonable alternatives. The approach is not considered to promote a sustainable pattern of development that seeks to meet the needs of the area and align growth and infrastructure in line with paragraph 11 of the NPPF.</p> <p>A reasonable and justified alternative to identifying villages such as Tunstead for additional housing growth would be allocation of Site H16 at Cley Road Holt.</p> <p>Finally, it is noted that the Inspector's interim letter identified that sites for at least 1000 new homes should be found, given the need to provide a contingency for unforeseen events such as further slippage of large allocations, the need for schemes to deliver nutrient neutrality or insufficient windfalls coming forward. The Further Consultation document identifies a minimum of 1271 additional dwellings could be delivered from the proposed amendments to the plan. However, it is important that the plan is advanced as soon as possible as any further delays will equate to additional housing numbers being required.</p>
Officer Response	<p>Comments noted. The Council is not currently in a position to review new site submissions at this stage of the Local Plan and has not undertaken a "call for sites" The approach set out in order to address the identified shortfall in the EIP timeline expected is set out in appendix 1 to this consultation and is based upon a review of sites already considered suitable but previously not required.</p> <p>It's understood that as promoters there has been recent discussions with the town council as part of a potential revised neighbourhood plan and potential site allocation(s) to help fulfil the town councils desire to plan for a future anticipated expansion of the adjacent burial site. No prior contact has been made with the council during the plan making process (pre further consultation) or pre application advice sought in relation to the suitability of the proposal to date.</p> <p>A similar site was reviewed earlier in the site allocation process and assessed as H16 & H16/1, the details of the site's assessment and its conclusion are set out in the Site Assessment Booklet for Holt which is included in the examination library ref D4. These were not taken forward as it was considered not deliverable. The main concern with these sites was around the impact on the wider road network as set out in the Site Assessment Booklet and through consultation with the Highway Authority, where it was stated that there would be an unacceptable impact on the wider highway network, particularly, in relation to the New Street/High Street Junction. It was also suggested that owing to the constrained nature of the road network in the centre of the town that it is not possible to provide the necessary mitigation or interventions required to improve this area of the network.</p> <p>The council do not agree with argument and justification that further allocations should be made in Holt because there is a lack of support for SGVs in some of the consultation responses. The council approach to identifying SGV is based on a set methodology as detailed in the supporting documents and not personal preference of parish/ town councils</p> <p>The requirements of plan making as set out in the NPPF is that the strategy is an appropriate strategy and not the most appropriate strategy as set out in para 35b of the Sept 2023 NPPF and 36b in the December 2024 version. Irrespective of this these matters are not considered as part of this consultation. The inspector has already ruled in his initial letter that SS1 and the approach to the distribution of growth is justified.</p>
Section	General Comments (including those not directly relating to a Proposed Change as set out in the Further Consultation)
ID	FC508
Response Date	18/12/2024 18:52:00
Full Name	
Organisation	Holkham Estate
Agent Full Name	David Jones
Agent Organisation	Armstrong Rigg Planning
Does the Proposed Change contribute to the overall soundness of the Plan?	On behalf of our client, the Holkham Estate, we are pleased to make representations to the North Norfolk Local Plan Further Consultation. These representations do not specifically concern the proposed changes set out in the consultation to address the Planning Inspector's interim findings, but rather the continued allocation of our client's land adjacent to Holkham Road, Wells (W07/1).

	<p>We note the concerns raised by the Inspector in his Post Examination Hearings Letter (ref. EH006(f)) regarding the landscape evidence base supporting the allocation and the recommendation that the policy should be deleted. We also note the disappointment expressed by the Council in their response (ref. EH006(g)) and the update provided regarding the pending planning application on the site. As noted in the Council's response, the application is supported by a further independent landscape visibility impact assessment which demonstrates that the proposed development can be successfully integrated into the local area. The Council also highlights the significant material considerations in support of the application, not least the bespoke housing approach designed to address the very specific local circumstances of Wells-Next-The-Sea, including 45% affordable dwellings and a further 10% for private rent to local people.</p> <p>We can now confirm that the planning application (ref. PF/24/1572) was taken to planning committee on 7th November 2024 where it received a resounding resolution to grant from members who expressed strong support for the delivery of affordable housing to meet critical needs in the local area. At this stage the Section 106 agreement is being finalised and we expect that the planning permission will be issued in early January 2025. We therefore see no reason why site should not be allocated in the Local Plan in recognition of its committed status.</p> <p>We trust that these comments will be given the due consideration and we look forward to participating further in any hearings.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	<p>These representations do not specifically concern the proposed changes set out in the consultation to address the Planning Inspector's interim findings, but rather the continued allocation of our client's land adjacent to Holkham Road, Wells (W07/1).</p> <p>We note the concerns raised by the Inspector in his Post Examination Hearings Letter (ref. EH006(f)) regarding the landscape evidence base supporting the allocation and the recommendation that the policy should be deleted. We also note the disappointment expressed by the Council in their response (ref. EH006(g)) and the update provided regarding the pending planning application on the site. As noted in the Council's response, the application is supported by a further independent landscape visibility impact assessment which demonstrates that the proposed development can be successfully integrated into the local area. The Council also highlights the significant material considerations in support of the application, not least the bespoke housing approach designed to address the very specific local circumstances of Wells-Next-The-Sea, including 45% affordable dwellings and a further 10% for private rent to local people</p> <p>We can now confirm that the planning application (ref. PF/24/1572) was taken to planning committee on 7th November 2024 where it received a resounding resolution to grant from members who expressed strong support for the delivery of affordable housing to meet critical needs in the local area. At this stage the Section 106 agreement is being finalised and we expect that the planning permission will be issued in early January 2025. We therefore see no reason why site should not be allocated in the Local Plan in recognition of its committed status.</p> <p>We trust that these comments will be given the due consideration and we look forward to participating further in any hearings.</p>
Officer Response	<p>Comments noted. The proposed scheme and application has evolved since the earlier hearings and the application for the site was resolved to be granted by the council development management committee in November 2024. It is expected that the council will issue the permission following the conclusion of S106 discussion shortly. The council supports the site retention in the Local plan as an allocation given the advancement of the permission and its ability to contribute to the plans five year housing supply.</p>
Section	General Comments (including those not directly relating to a Proposed Change as set out in the Further Consultation)
ID	FC514

Response Date	18/12/2024 10:57:00
Full Name	
Organisation	The Delahunty Family
Agent Full Name	James Ellis
Agent Organisation	Rural Solutions
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILE
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	Land at Sculthorpe, Further Consultation Response - 18.12.24.pdf
Officer Summary	<p>Support: supports the approach of the council to accommodate additional opportunities for growth in SGVs, including Sculthorpe.</p> <p>Promotion of site in Sculthorpe on Land off Creake Road, where detailed pre-application was sought (DE21/23/2521) and received a positive response for 20 dwellings, based on the adopted rather than the emerging plan. Given the favourable nature of pre-application advice received, it is considered that the site could be allocated in the final Plan, assisting with meeting the strategic plan objectives of supporting growth in smaller villages.</p> <p>Supports the increase to the indicative housing allowance to 9% growth. There are other land opportunities for housing development within Sculthorpe in the family ownership, with clear opportunities for affordable housing.</p> <p>Requests that the proposed site for approx., 20 dwellings is allocated and in addition to the 9% housing allowance. If not allocated, then a greater allowance is allowed to reflect opportunities for development.</p>
Officer Response	<p>Support noted.</p> <p>As set out in Policy SS1 of the Submitted Local Plan, SGVs do not have site allocations, but instead have an indicative housing allowance where a site can come forward provided a planning application satisfies the requirements of criteria 3 of the policy. For information, the defined settlement boundary for Sculthorpe can be viewed within the Settlement Boundary Review (SGVs) Background Paper 11 [Examination ref. C11]. It will be through the submission of a planning application that any site-specific constraints would be considered as part of the assessment process.</p> <p>Additional sites for affordable housing can come forward at any time in line with Policy HOU3 Affordable Homes in the Countryside (Rural Exceptions Housing).</p>
Section	General Comments (including those not directly relating to a Proposed Change as set out in the Further Consultation)
ID	FC515
Response Date	19/12/2024 10:55:00
Full Name	
Organisation	The Wilson Family
Agent Full Name	James Ellis
Agent Organisation	Rural Solutions
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILE
Do you consider it necessary to participate in a public hearing session, should these be required?	

<p>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</p>	
<p>Include files</p>	<p>Land at Tricorn Farm Holt - Further Consultation Response 19.12.24.pdf</p>
<p>Officer Summary</p>	<p>As one of the larger settlements (and a Small Growth Town) within the district the strategic approach taken by the plan to land at Holt is a matter that should be considered in the assessment of modifications to the plan to meet increased housing numbers. Holt and the site referenced within this representation have the opportunity to accommodate additional growth to meet the identified undersupply of housing in the submission plan.</p> <p>Land at Tricorn Farm, Holt- as it is referenced in background documents H4. The site provides a growth option for Holt outside of the Norfolk Coast National Landscape (Area of Outstanding Natural Beauty). The site is classed as a mixed-use option in document H4, with sites solely housing and employment sites noted in separate tables.</p> <p>The Town Council notes in EH011 (q)(i) "<i>the Town Council are aware of landowners willing to offer new sites</i>" and this is (one of or) the site(s) to which indirect reference is made. The Inspector's acknowledgement at paragraphs 51 and 52 of the July letters and in particular: "<i>In addition, Policy E3 could include support for alternative proposals to come forward in Holt if suitable sites become available, as the withdrawal of the allocation results in a lack of employment land options in the town.</i>"</p> <p>There is active developer interest in the site that is being explored by the landowner. This site, as with other Group B sites, is a site that was assessed, but not originally selected but which "<i>could still allow some development to occur albeit on a smaller scale</i>" (para 2.7 of Additional Sites paper linked to the consultation). The site can therefore be considered an option to include a mixed-use scheme, including housing to help fill the shortfall the Inspector has identified in the plan and, in association with this, to provide employment land to fill the shortfall in the area identified following of a proposed employment allocation in Holt.</p> <p>The site is in an intensive agricultural . There are numerous structures/ buildings across the site, access from Hunworth Road to the west and tall agricultural structures adjacent to it. The site is in the widely drawn Glaven Valley Conservation Area. The location of the site between the quarry and outer edge of Holt, together with its flat topography and relatively well-screened boundaries, means that it does not contribute strongly to the Conservation Area.</p> <p>At this strategic scale of representation, it is not the intention to provide a masterplan for the site, however it is clear from review of the site by the land owner and Rural Solutions Planning and Landscape colleagues, that the site holds potential for development in the short-term and beyond on the basis of the following opportunities:</p> <p>Historic mapping – subdivision into parcels</p> <p>Opportunity: The adjacent Holt Country Park creates an opportunity to deliver green infrastructure corridors across the site linking the two areas in a landscape led way.</p> <p>Opportunity: to reinforce existing landscaped boundaries of the site, in order to accommodate development in a way that does not detract from the Glaven Valley Conservation Area.</p> <p>Opportunity to create a strong buffer to the western boundary of the site is identified, with a clear, hard boundary between the site and land to the west which includes Hunworth Road, a quarry and to the south of a quarry, industrial and intensively managed agricultural land.</p> <p>The site provides an opportunity to develop outside of the Norfolk Coast National Landscape. opportunity as part of a proposal to re-use the land to promote a speed reduction on the B1149 from the national speed limit, if a reduction has not already been delivered.</p> <p>opportunity to site much-needed employment buildings in Holt, with an innovative approach to landscaping and building design ensuring that buildings sit well within the site, with limited impact on the surrounding landscape.</p> <p>The site can be developed in a way that responds positively to climate change (and biodiversity challenges). The site holds potential for renewable energy generation.</p> <p>Opportunities have been identified to enhance connectivity with Holt including junction and pedestrian infrastructure improvements at the junction of the B1149 and Hunworth Road. There is an opportunity over the plan-period (and beyond) to create a well-planned development that incorporates strategic green infrastructure, through a historic landscape and ecology led approach.</p> <p>Aligned with objectives of the Holt NP and the strategic objectives of the Local Plan</p> <p>Given the pressing need for new housing and the requirement to create a sound, effective plan, there is potential for a fourth site to be added into the final version of the plan. There is particular justification for Land at Tricorn Farm given the issues identified in preceding sections.</p> <p>Option 1: Allocate a site covered by the northern historic field part of the site c. 2.7ha for 50 - 100 houses (including 35% affordable housing), with potential for small-scale employment Uses. such as a rural business centre or small workshops could also be accommodated.</p>

Option 2: Allocate the northern section of the site for 50-100 houses (including 35% affordable housing) together with a 6ha employment site.

An allocation of the site would be linked to an extensive landscape led Masterplanning exercise with the landowner working with the Town Council and District Council prior to any application being brought forward.

Option 3: Allocate the site in its entirety

An allocation of the site would be linked to an extensive landscape led Masterplanning exercise with the landowner working with the Town Council and District Council prior to any application being brought forward. A clear phasing plan would ensure that the site can be brought forward in a phased way with new green infrastructure introduced across the entire site at an early stage in the process.

In addition to options associated with allocating the site, there are other options to identify the potential that the site holds for mixed use development, including housing and Employment.

Paragraph 52 of the Inspector's post-hearings letter, states that:

"In addition, Policy E3 could include support for alternative proposals to come forward in Holt if suitable sites become available, as the withdrawal of the allocation results in a lack of employment land options in the town."

Policy E3 of the Local Plan is already proposed to be amended by way of a minor modification (PMIN/E3/01) with the proposed text amendment allowing sites to come forward in Holt where no land is to be allocated for employment uses

Summary

Option 1 (Preferred): To specifically identify in the policy (E3) Land at Tricorn Farm, Holt as a potential mixed-use site in the policy with an opportunity site highlighted on the proposals maps.

Suggested policy addition:

"To deliver additional employment land [and new housing] at Holt, Land at Tricorn Farm, Holt is identified as a mixed-use opportunity site that can meet the employment needs of Holt and the surrounding rural area, with an appropriate scale of housing development facilitating delivery of employment premises and providing additional housing to meet local needs. Any proposals for the site should be brought forward following a detailed Masterplanning exercise and pre-application proposal, recognising the site opportunities and importance of high-quality design."

Suggested policy justification:

"During the production of the Local Plan a proposed employment site at Holt was removed from the allocation process. The need to accommodate additional housing land was also identified. Land at Tricorn Farm, Holt has been identified as an opportunity site that can meet the employment needs of the town and local area, with associated housing development contributing to local and plan-area needs, creating a mixed-use scheme that should be subject to a detailed Masterplanning exercise and pre-application engagement process."

Option 2: To specifically identify in the policy Holt (if not the site) as a location for employment development with mixed-use development as an option.

Suggested policy addition:

*"New employment development on non-allocated sites at Holt will in particular be supported where a proposal meets the economic needs of the town and local area and confirms to other policy requirements of the plan. **Mixed** use proposals will be considered where this an element of housing will facilitate the new employment development."*

Suggested policy justification:

"During the production of the Local Plan a proposed employment site at Holt was removed from the allocation process. On that basis the policy specifically supports opportunities for new employment development on unallocated sites. The policy supports mixed-use developments where this would help to facilitate employment development, where new housing would be compatible with employment uses and contribute to the housing objectives and policies of the plan."

Officer Response

A number of alternative options have been considered in identifying additional sites and the background paper contained in the further consultation material at appendix 1 and provides the detailed justification of the approach taken. The Council is not currently in a position to review new site submissions at this stage of the Local Plan and has not undertaken a "call for sites".

The response wrongly implies the site is categorised as a group B site in the supporting site assessment set out in appendix 1 to this consultation. Although the site was assessed in the early stages of the Plan it was discounted from further consideration and there has been little to no promotion of the site throughout the Local Plan period.

The site at this location is referenced as H25 in the detailed site assessment booklet that supports the local plan – examination reference D4, Please note ref to H4 refers to the Council's indoor leisure strategy. The site is considered not deliverable / developable in the Plan period and is constrained in a number of ways: environmental and landscape issues such as close proximity to Norfolk Valley Fens SSS1 and wholly within the Glaven Valley Conservation Area and being detached from the town itself. Although site access is quoted as being achieved, access off these roads is considered unacceptable by highways and with the site being remote from the town would result in an increased use of unsustainable transport modes. Furthermore, the local road network is considered to be unsuitable for residential development. The site scores negatively in the SA.

A number of options are put forward from residential allocations to mixed use development across different scales with the representation conclusion that the site should get specific mention in a modification to policy E3

As detailed below **Option 1 (Preferred):** *To specifically identify in the policy (E3) Land at Tricorn Farm, Holt as a potential mixed-use site in the policy with an opportunity site highlighted on the proposals maps*

The council disagrees with the justification put forward which remains partial and does not wholly consider the constraints identified to date or provide any certainty as to how such constraints can be overcome.

On the basis of discussions at the earlier hearing sessions the Council has proposed an additional modification to policy E3 to the one quoted and which remains in front of the Inspector. The modification put forward will allow for the support of new build employment development outside designated settlement boundaries which are well related to the built-up areas where it can be demonstrated that designated employment sites or other sites within the settlement boundary are not suitable or available. This modification is deemed sufficient to address the concerns around flexibility if the Plans support for employment provision previously examined through the hearings and relates to all selected settlements not just Holt.

Section	General Comments (including those not directly relating to a Proposed Change as set out in the Further Consultation)
ID	FC516
Response Date	19/12/2024 10:15:00
Full Name	
Organisation	Norfolk Homes Ltd
Agent Full Name	Mr Alan Presslee
Agent Organisation	Director Cornerstone Planning Ltd
Does the Proposed Change contribute to the overall soundness of the Plan?	SEE ATTACHED FILE No - please see attached.
Do you consider it necessary to participate in a public hearing session, should these be required?	Yes
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	To allow the issues and process to be thoroughly discussed.
Include files	Representation - Local Plan Changes - Dec. 2024 - Holt - Norfolk Homes.pdf
Officer Summary	Norfolk Homes Ltd supports the principle of the Proposed Changes, including introducing new site allocations to help meet the overall shortfall in planned housing provision, and provide flexibility in the delivery of new housing across the revised Plan period (2024-2040). We acknowledge the Inspector's desire to progress this stage of Proposed Changes, and foreshorten the time taken in order to limit any further delay towards the further examination,

and then adoption, of the Local Plan. However, we do not believe that it is sound to limit the identification of potential additional sites only to those previously considered at earlier stages of the Plan's preparation. Recommend that the process of considering potential additional sites should not be constrained in this way, and that the process should therefore facilitate the consideration/assessment of other available land/sites

Norfolk Homes therefore submits land north of Woodfield Road, Holt, for consideration as part of these Proposed Changes to the Local Plan. It proposes that the site be available for a c.100 space community car park, accessed from Cley Road, c. 80-90 dwellings, including Local Plan compliant levels of affordable housing – 35% - public open space (in addition to the retained woodland), accessible/adaptable homes, etc.), served via the existing development/Woodfield Road. As part of these proposals, Norfolk Homes would construct, layout and install the car park.it would be prepared to make a significant contribution thereto Holt town council Skatepark committee.

Officer Response

Support for all the proposed changes in the further consultation in principle is noted.

The Council is not currently in a position to review new site submissions at this stage of the Local Plan examination and has not undertaken a "call for sites".

The approach set out in order to address the identified shortfall is positively prepared and reflects the limitations in line with the time limits now expected following intervention in plan making by the new government following the national election as set out in the letter from the housing minister, Matthew Pennycook to the Planning Inspectorate dated 31st July 2024 which "states that pragmatism should not be used to address fundamental issues with the soundness of a plan, which would be likely to require pausing or delaying the examination process for more than six months overall". The approach as detailed in the background paper set out in appendix 1 to this consultation is based upon a review of sites already considered suitable but previously not required. In doing so it is considered that there are enough sites in conjunction with increase in supporting rural growth to address the issues of soundness as identified by the inspector at this time. As detailed in appendix 7 the approach is considered a positive and proportionate response and seeks to increase the housing supply over and above requirements so as to build in further flexibility and choice.

Confirmation that the development would provide policy compliant affordable housing levels in any future application is particularly welcome given the position taken previously on the adjacent site which was allocated in the previous Plan, in relation to affordable housing and the subsequent court action due to Norfolk Homes position at the time and unwillingness to deliver on affordable housing agreements. Any application would need to be fully policy compliant including meeting the Councils affordable housing levels

The representation includes detailed reference to many material considerations which would normally be considered at planning application stage as well as the omission of many statutory considerations and supporting evidence. This would be required in order to undertake a more detailed assessment.

It's noted that there is no policy base for a carpark but that additional carparking provision in the town has been a longstanding ambition of the town council and the provision of was previously linked to the previous permission on the adjacent site with delivery through the town council. It noted that the carpark proposed is on the outskirts of the town and given the size proposed, along with the indication of access arrangements onto Cley Rd there is the potential to impact on the wider road network which may result in a Highway objection. In relation to previous sites assessed adjacent to Cley Rd and as detailed in the site assessment background paper [D4] Highways have advised that although site access may be achievable onto Cley Rd such access from Cley Road is considered unacceptable by Highways owing to the impact that development traffic would have on the wider highway network, particularly, the New Street/High Street Junction. Highways suggest that owing to the constrained nature of the road network, in the historic heart of the town, it is not possible to provide the mitigation or interventions required to improve the road junctions.

Similarly, the commitment to provide for off-site play area contributions in line with Holt town council skate park committee requests is welcomed, however any such contributions would remain optional and only be a material consideration if considered in addition to the policy requirements for open space including any requirements in relation to pay space and equipment. Any proposal first must be in line with the Councils open space policies and standards as set out in policy HC2 of the Local Plan.

In addition, with the site been located in designated National Landscape (former AONB) there remains landscape considerations to justify the major development intrusion into the former AONB.

If Norfolk Homes wish to pursue such a development at this time, then the council offer a pre application service.

Section	General Comments (including those not directly relating to a Proposed Change as set out in the Further Consultation)
ID	FC531
Response Date	18/12/2024 15:03:00
Full Name	Jennie Schamp
Organisation	Group Manager - Operational Risk and Policy Norfolk Fire and Rescue Service Norfolk County Council (Fire & Rescue)
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>New developments as set out in Local Plans can potentially change the risk profile for the area and increase attendance times to incidents. Increases in population place additional demand on fire and rescue resources, both in terms of the need for additional capital investment in new facilities and vehicles and funding for additional equipment based on increased risks. This also impacts revenue budgets for firefighters, officers, and support staff. Norfolk Fire and Rescue Service (NFRS) dynamically reallocates resources across the county to meet changes in risk and demand.</p> <p>The capability and availability of water resources to fight fires is also a key consideration for the Service. The provision of public fire hydrants on residential developments is not covered by Building Regulations 2010 (Part B5 as supported by Secretary of State Guidance 'Approved Document B'). Developers are expected to make provision for fire hydrants to adequately protect a development site for fire-fighting purposes. Any additional sites in the Local Plan should make appropriate reference to the need for fire hydrant provision associated with new development.</p> <p>Any additional sites in the Local Plan should have regard to the need for Fire appliance access to all areas of developments as this is vital for emergency response and should be in compliance with Building Regulations 2010 (Part B5 as supported by Secretary of State Guidance 'Approved Document B').</p> <p>Where residential properties (dwelling houses) are located more than 45 meters away (furthest point of floorplan) from the closest fire appliance access location British Standard 9991 directs that domestic sprinklers should be installed in accordance with British Standard 9251 and this will allow a maximum access distance of 90 metres to the furthest point of the floorplan in dwellinghouses with no floor more than 4.5 metres above ground. This is reduced to 75 metres where a floor is over 4.5 metres above ground. Norfolk Fire & Rescue Service would expect developers to adhere to the access distances given above or prove comparable safety of occupants should they wish to deviate from these.</p> <p>NFRS recognises the need for Councils to have a positive strategy to promote renewable energy generation in developments.</p> <p>Developments which include PV arrays, Domestic Energy Storage Systems (DESS) and electric vehicle charging points should comply with national guidance, Institute of Engineering and Technology Codes of Practice and PAS63100:2024. Developers should consult with NFRS both before and during planning stage on safe installation and location within residential dwellings.</p> <p>Any parking policy in new developments should clearly reflect the above fire safety issues/requirements.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	
Officer Summary	<p>New developments as set out in Local Plans can potentially change the risk profile for the area and increase attendance times to incidents. Increases in population place additional demand on fire and rescue resources, both in terms of the need for additional capital investment in new facilities and vehicles and funding for additional equipment based on increased risks. This also impacts revenue budgets for firefighters, officers, and support staff. Norfolk Fire and Rescue Service (NFRS) dynamically reallocates resources across the county to meet changes in risk and demand.</p>

The capability and availability of water resources to fight fires is also a key consideration for the Service. The provision of public fire hydrants on residential developments is not covered by Building Regulations 2010 (Part B5 as supported by Secretary of State Guidance 'Approved Document B'). Developers are expected to make provision for fire hydrants to adequately protect a development site for fire-fighting purposes. Any additional sites in the Local Plan should make appropriate reference to the need for fire hydrant provision associated with new development.

Any additional sites in the Local Plan should have regard to the need for Fire appliance access to all areas of developments as this is vital for emergency response and should be in compliance with Building Regulations 2010 (Part B5 as supported by Secretary of State Guidance 'Approved Document B').

Where residential properties (dwelling houses) are located more than 45 meters away (furthest point of floorplan) from the closest fire appliance access location British Standard 9991 directs that domestic sprinklers should be installed in accordance with British Standard 9251 and this will allow a maximum access distance of 90 metres to the furthest point of the floorplan in dwellinghouses with no floor more than 4.5 metres above ground. This is reduced to 75 metres where a floor is over 4.5 metres above ground. Norfolk Fire & Rescue Service would expect developers to adhere to the access distances given above or prove comparable safety of occupants should they wish to deviate from these.

NFRS recognises the need for Councils to have a positive strategy to promote renewable energy generation in developments.

Developments which include PV arrays, Domestic Energy Storage Systems (DESS) and electric vehicle charging points should comply with national guidance, Institute of Engineering and Technology Codes of Practice and PAS63100:2024. Developers should consult with NFRS both before and during planning stage on safe installation and location within residential dwellings.

Any parking policy in new developments should clearly reflect the above fire safety issues/requirements.

Officer Response	Comments noted.
Section	General Comments (including those not directly relating to a Proposed Change as set out in the Further Consultation)
ID	FC581
Response Date	19/12/2024 12:03:00
Full Name	Gemma Clark
Organisation	Higher Officer, Sustainable Development, Norfolk Coast and Marine Team Natural England
Agent Full Name	
Agent Organisation	
Does the Proposed Change contribute to the overall soundness of the Plan?	<p>SEE ATTACHED FILES</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Summary of Natural England's advice</p> <ol style="list-style-type: none"> 1 Recreational disturbance to designated sites 2 Potential loss of best and most versatile (BMV) agricultural land 3 Impacts to National landscapes 4 Nutrient neutrality <p>We have reservations about the increased recreational pressure the additional sites will generate and the impact to designated sites on the coast. The Green Infrastructure and Recreational Avoidance Mitigation Strategy (GIRAMS) is a strategic solution to help with the in-combination effects of increased recreational disturbance. However, for large sites onsite green infrastructure may be required in addition to this payment to mitigate for the impacts of the development alone.</p> <p>Many of the site specific polices propose very small areas of green infrastructure which may not mitigate impacts to designated sites. Large development sites may require bespoke mitigation measures delivered within the designated sites identified. It is important that plan policy is sufficiently robust to enable the council to make prompt decisions at the application stage, without input from Natural England. (Please refer to Annex 1).</p> <p>There is also the potential loss of Best and Most Versatile (BMV) agricultural land. Decisions about development should take full account of the impact on soils, their intrinsic character</p>

	<p>and the sustainability of the many ecosystem services they deliver (please refer to Annex 2) and impacts to National Landscapes (see Annex 3).</p> <p>Lastly, we advise that for every allocation which is in a Nutrient Neutrality catchment, the policy stipulates that a Habitat Regulations Assessment (HRA), nutrient budget and mitigation strategy is submitted with a planning application.</p>
Do you consider it necessary to participate in a public hearing session, should these be required?	
If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:	
Include files	<p>Natural England - Annex 1.pdf Natural England - Annex 2.pdf Natural England - Annex 3.pdf</p>
Officer Summary	<p>SGV. Natural England has no specific comment relating to the addition of 10 Small Growth Villages listed under Proposed Change 12 and 13.</p> <p>G& T - no comments to make on Proposed Change 14.</p> <p>SA - We confirm that the Sustainability Appraisal (SA) has been undertaken and meets the requirements of the SA Directive. The process has been undertaken in an iterative way alongside the preparation of the Local Plan.</p> <p>HRA - Having considered the assessment Natural England advises that we concur with the assessment conclusions so far in relation to water quality, however we have some concerns relating to recreational disturbance. After screening all the new allocated sites would trigger Likely Significant Effects (LSE) for water quality and/or increased recreation (table 3 page 10 – 13). The additional 10 Small Growth Villages also trigger LSE for water quality, increased recreation, general urban effects and in the case of Great Ryburgh, potential loss of supporting habitat due to the proximity to River Wensum SAC.</p> <p>Many of the sites are in Nutrient Neutrality catchments of The Broads and River Wensum. For these allocations a project level HRA will need to be undertaken informed by a nutrient budget calculation and mitigation strategy.</p> <p>Summary of NE advice:</p> <p>We have reservations about the increased recreational pressure the additional sites will generate and the impact to designated sites on the coast. The Green Infrastructure and Recreational Avoidance Mitigation Strategy (GIRAMS) is a strategic solution to help with the in-combination effects of increased recreational disturbance. However, for large sites onsite green infrastructure may be required in addition to this payment to mitigate for the impacts of the development alone.</p> <p>Many of the site specific policies propose very small areas of green infrastructure which may not mitigate impacts to designated sites. Large development sites may require bespoke mitigation measures delivered within the designated sites identified. It is important that plan policy is sufficiently robust to enable the council to make prompt decisions at the application stage, without input from Natural England. (Please refer to Annex 1).</p> <p>There is also the potential loss of Best and Most Versatile (BMV) agricultural land. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver (please refer to Annex 2) and impacts to National Landscapes (see Annex 3).</p> <p>Lastly, we advise that for every allocation which is in a Nutrient Neutrality catchment, the policy stipulates that a Habitat Regulations Assessment (HRA), nutrient budget and mitigation strategy is submitted with a planning application.</p>
Officer Response	<p>Comments and support noted. Much of these commentaries provide general advice and in some cases relate to matters already examined and as such fall outside the scope of further consultation. Individual comments on specific proposed change are commented on in more detail under each proposed change or supporting document section in this schedule.</p> <p>In relation to the GIRAMS the strategy has been developed through the Norfolk Strategic Framework with input at the project steering group level throughout from NE. The strategy acknowledges that for large sites of 50 units plus contributions will be required towards the strategic mitigation measures in accordance with the Action Plan and that additional measures in relation to enhanced on site green infrastructure, EGI or contributions towards off site strategic GI will also be required. These requirements are contained in policies CC11 and ENV5 as submitted and duly examined at the earlier hearings sessions in March 2024. modified where required from the previous hearings.</p>

As covered in response to FC596 in relation to the SA The SA Objective SA1 covers a number of matters within it – promotion of efficient use of land, minimisation of loss of undeveloped land, optimisation of use of previously developed land (PDL), buildings and existing infrastructure and protection most valuable agricultural land. Draft Policy SS1 scores this objective as neutral, taking into account the impact on each of these matters, and particularly as the approach concentrates the majority of the growth (approximately 90%) into the identified top three tiers of the settlement hierarchy. As such, development is directed to the most appropriate land, minimising the loss of undeveloped land and keeping sites close to existing settlement boundaries. The scoring acknowledges the limited brownfield sites across the district.

In relation to nutrient neutrality this requirement was published after submission on the Local plan and a modification already been agreed with NE and put forward and examined in relation to Policy CC13. This modification includes the agreed position from the earlier hearings around qualifying development located in the catchments of the River Wensum SAC and Broads SAC and the Broadland Ramsar providing evidence of no adverse effects on the integrity of the habitats sites and demonstrate nutrient neutrality. The Nutrient calculator are available on the Council's web site. The Council requires a completed nutrient budget calculator using the most up to date "Norfolk Calculator" or "Natural England Calculator" as part of the required Nutrient Neutrality Statement at validation stage for all appropriate planning applications as detailed on the adopted Validation list (<https://www.north-norfolk.gov.uk/tasks/planning-services/development-management/north-norfolk-local-validation-requirements-list/#section-1>).