

THE BLAKENEY NEIGHBOURHOOD PLAN



Pointing Blakeney towards the Future

Consultation Statement

July 2021

Prepared by:

Blakeney Neighbourhood Plan Steering Group on behalf
of Blakeney Parish Council with support from:



NEIGHBOURHOOD PLANNING AND PROJECT MANAGEMENT

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Consultation Statement

1. Executive Summary

- 1.1. The Consultation Statement has been produced to meet the statutory requirements of the Neighbourhood Planning (General) Regulations 2012, subsequent updates and amendments.
- 1.2. This document summarises the community consultation process undertaken in developing the Blakeney Neighbourhood Plan and sets out how the requirements of Regulations 14 and 15 have been satisfied.
- 1.3. Section 3 outlines the key stages while Section 4 details explains how each of the activities and events were undertaken, with details of the responses received from local residents and stakeholders.
- 1.4. A number of concerns and issues were raised in the pre-submission consultation and these are summarised below:-
- ✚ Impact of new development on the character of the village
 - ✚ Site allocations linked to the emerging Local Plan
 - ✚ Affordability of homes and local residents being priced out of the market
 - ✚ Second home ownership
 - ✚ Light pollution
- 1.5. Some of the key messages and comments made were :-

... Local involvement ...

"I have read through the pre-submission version of the Neighbourhood Plan and would like to say, Well Done, to all those who managed to stay the course."

"Top marks 100%"

"We welcome the production of this neighbourhood plan....."

... Traffic and parking impact ...

“The future of the traffic congestion + road planning must be dealt with.”

“The traffic noise and pollution will become an increasing problem.”

“Consider width of lorries and size of modern cars”

“..... more thought should be given into improving traffic flow within the village.”

... Need for open space ...

“Keep open all public footpaths and open spaces.”

“Views towards St Mary’s Church and those across the Parish from Green Bank towards the village and the Lincolnshire coast are especially important.”

“Sense of remoteness, peace and tranquillity”

... Housing Design ...

“...involve a high standard of design which enhances the visual quality of the landscape and built environment...”

“...will not detract through scale, materials and design.”

- 1.6. All of these comments, plus many more, have been addressed in the responses given in Appendix 14 of this document and where appropriate through the updated Blakeney Neighbourhood Plan.
- 1.7. The Blakeney Neighbourhood Plan is not promoting more or new development for Blakeney.

2. Introduction

2.1. Background

- 2.2. The Blakeney Neighbourhood Plan has been informed through extensive community consultation and research. It is the result of the residents of Blakeney working together to have their say on future development in the parish.



- 2.3. A Steering Group comprising volunteers from the community has, with the support of consultants, led on developing the Blakeney Neighbourhood Plan and initiated a programme of community engagement and involvement.

- 2.4. As part of developing the Neighbourhood Plan, the Steering Group has analysed a significant amount of data collected through a programme of community engagement and consultation. This has been supplemented with historic data taken from Census records, Historic England and other sources.

- 2.5. The main purpose of this document is to comply with the statutory requirements of the Neighbourhood Planning (General) Regulations 2012 (and subsequent updates) by setting out how the requirements of Regulations 14 and 15 have been satisfied.



2.6. Consultation Requirements

2.7. The Consultation Statement has been prepared to fulfil the legal obligations of Regulations 14 and 15 of the Neighbourhood Planning Regulations 2012 (and subsequent updates).

2.8. Section 15(2) of Part 5 of the Regulations sets out that a Consultation Statement should:

- ✚ contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- ✚ explains how they were consulted;
- ✚ summarises the main issues and concerns raised by the persons consulted; and
- ✚ describes how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Development Plan.

2.9. This document summarises the community consultation process undertaken in developing the Blakeney Neighbourhood Plan and demonstrates how the requirements of Regulation 14 and Regulation 15 have been met.

2.10. Section 3.0 outlines how requirements of Regulation 15 have been met with further detail contained in Section 4.0 and in the Appendices.

2.11. Section 5.0 demonstrates how obligations of Regulation 14 have been satisfied.



3. Summary of Key Stages, Events and Activities

3.1. Overview

3.2. Blakeney Parish Council has led on the development of the Blakeney Neighbourhood Plan. Back in 2017, the Parish Council first considered the benefits neighbourhood planning would bring to the local community and resolved to produce a Neighbourhood Plan for Blakeney.

3.3. The Parish Council cited two reasons for deciding to produce a neighbourhood plan:

- ✚ To ensure that planning decisions are consistent with the Parish Council's endeavour to maintain the unique nature of the village in its position as an Area of Outstanding Natural Beauty and a Conservation Area; and
- ✚ Secondly to enable affordable housing to be built as appropriate to allow young people from the village to continue to reside there.

3.4. One of the first steps was to apply for a designated Neighbourhood Area, and then form a Steering Group to undertake the detailed preparation of the Neighbourhood Plan. The Steering Group first met in January 2018.

3.5. In accordance with section 15(2) in Part 5 of the Neighbourhood Planning Regulations, this Consultation Statement, sets out details of key stages, as well as the events and activities that have taken place.

3.6. Key Events and Stages



3.7. Designation of the Neighbourhood Area

3.8. On 7th November 2017 Blakeney Parish Council applied to North Norfolk District Council, the local planning authority, for designation of a Neighbourhood Area.

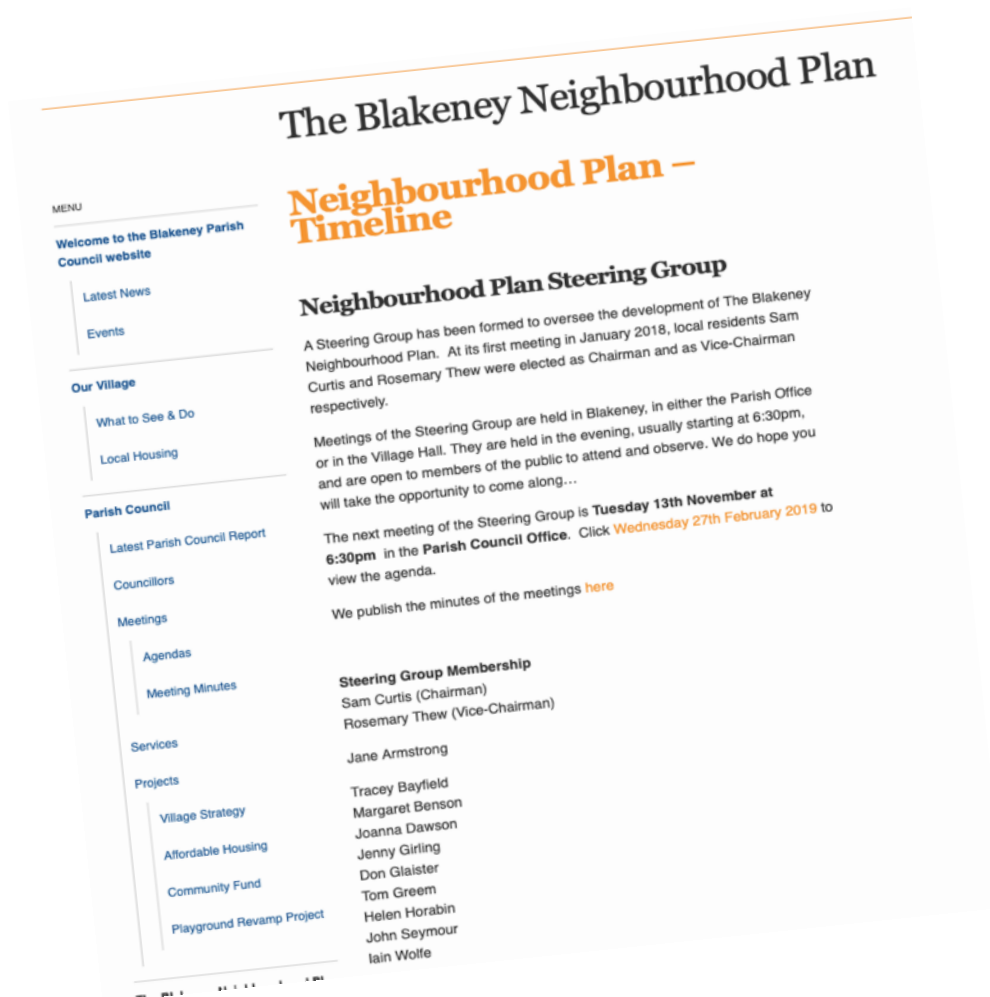
3.9. In the application, the Parish Council requested that the Neighbourhood Area comprise the entire parish of Blakeney to align with the parish boundary (see Appendix 1).

3.10. North Norfolk District Council publicised the application, determined the application to be appropriate and on 30th November 2017 the entire parish area of Blakeney was designated as the Blakeney Neighbourhood Area (see Appendix 2).

3.11. **Establishing a Steering Group**

3.12. Blakeney Parish Council agreed a Terms of Reference for the Steering Group (see Appendix 3).

3.13. A Steering Group was formed to oversee the development of The Blakeney Neighbourhood Plan. The Steering first met in January 2018 and at that meeting local residents Sam Curtis and Rosemary Thew were elected as Chairman and as Vice-Chairman respectively.



- 3.14. Regular open meetings of the Steering Group were held, in either the Parish Office or in the Village Hall, throughout the development of the Blakeney Neighbourhood Plan.
- 3.15. Details about the Steering Group, including meeting dates, agendas and minutes were shared via the Parish Council website:

www.blakeneyparishcouncil.org.uk



3.16. Communication

- 3.17. A Communication Strategy was written and implemented by the Steering Group (see Appendix 4). To encourage community engagement, a range of communication channels were employed throughout development of the Plan.
- 3.18. To ensure the consultation process was as inclusive as possible, the following methods were used:
- ✚ Series of community consultation events in Blakeney Village Hall;
 - ✚ Questionnaire hand-delivered to every household in the village;
 - ✚ Open meetings of the Steering Group;
 - ✚ Presentations followed by 'Q & A' sessions at Annual Parish Meetings;
 - ✚ Website and Social Media;
 - ✚ Newsletters and posters;
 - ✚ Email Updates
 - ✚ Glaven Valley magazine articles (see Appendix 6)
- 3.19. Section 4 of this document provides further detail on each of the above activities.

3.20. **Summary of Consultation**

3.21. A number of community consultation events and activities have taken place at key stages throughout production of the Blakeney Neighbourhood Plan. These are summarised below:

✚ March 2017

3.22. Introduction to Neighbourhood Planning presentation given at the Annual Parish Meeting followed by a 'Question and Answer' session for those in attendance.

✚ January 2018

3.23. Steering Group formed and meets for first time to oversee the development of the Blakeney Neighbourhood Plan.

3.24. Edition 1 of Neighbourhood Plan Newsletter to introduce process and publicise launch event was hand-delivered to every household and business in Blakeney.

✚ February 2018

3.25. Community event to launch the neighbourhood plan to local residents and stakeholders.



✚ March 2018

3.26. Presentation given to Annual Parish meeting sharing progress to date, feedback from the community event and next steps.

3.27. Residents and councillors present were asked to share their initial thoughts on the Vision, Aims and Objectives for the Blakeney Neighbourhood Plan.

✚ April 2018

3.28. Community event to test the Vision and Objectives. To seek views on statements and questions that could be developed into policies. Gaining an understanding of the community's priorities and aspirations.

July 2018

- 3.29. Edition 2 of Neighbourhood Plan Newsletter to advertise the Community Event on 28th July and to introduce the agreed Vision and Objectives was hand-delivered to every household and business in Blakeney.
- 3.30. Community Event to feedback from February Community Event, to introduce the Vision and Objectives and to seek answers to statements, questions and policy.

September 2018 to September 2019

- 3.31. A series of open Steering Group meetings, open to the public to attend, to review the outcomes of the July 2018 Consultation Event and to develop and test the policies for the Blakeney Neighbourhood Plan.

March 2019

- 3.32. Presentation given to Annual Parish meeting sharing progress to date, feedback from the community events and next steps.

October 2019

- 3.33. Regulation 14. The six-week statutory consultation on the Pre-submission draft Blakeney Neighbourhood Plan on the commenced on 3rd October 2019 and closed on 15th November 2019.
- 3.34. Two Community Support Events were held on 22nd and 23rd October to support the Pre-submission Consultation.

December 2019 to March 2020

- 3.35. A series of open Steering Group meetings to review each of the responses received from residents, businesses and stakeholders to the Blakeney Neighbourhood Plan Pre-submission consultation.
- 3.36. Meetings were held in the evening, usually starting at 6:30pm, and open to members of the public to attend and observe.
- 3.37. Each response was considered and how it should be reflected within the Blakeney Neighbourhood Plan.
- 3.38. Details of the responses and actions taken are recorded in Appendix 14.



4. Events and Activities

4.1. The Blakeney Neighbourhood Plan has been informed by the various consultation activities undertaken as part of the neighbourhood planning process. This section provides further detail about activities and explains:

- ✚ Who was consulted
- ✚ How they were consulted
- ✚ What response was received



4.2. Newsletters and Posters

WHO WAS CONSULTED	HOW THEY WERE CONSULTED	WHAT RESPONSE WAS RECEIVED
<p>Households and businesses throughout Blakeney.</p> <p>Newsletters were hand-delivered to every household & business in Blakeney.</p> <p>Copies were also available at the community events.</p>	<p>Newsletters were produced, at key stages during the development of the Neighbourhood Plan.</p> <p>Their purpose being to publicise consultation events to encourage community involvement; and to share information about the neighbourhood planning process and provide progress updates.</p> <p>See Appendix 10.</p>	<p>Residents have said the newsletters gave them a better understanding of the neighbourhood planning process.</p> <p>The newsletters have also prompted questions, which residents have come along to ask at the community events.</p>

4.3. Website

WHO WAS CONSULTED	HOW THEY WERE CONSULTED	WHAT RESPONSE WAS RECEIVED
<p>Residents of Blakeney, local businesses and stakeholders were targeted.</p> <p>Although anyone with access to a tablet, computer or smartphone could access the web pages.</p>	<p>A section all about the Blakeney Neighbourhood Plan was set up on the Parish Council website.</p> <p>It has been used to share information about the Plan, publicise consultation activities and to provide feedback from the events.</p> <p>Steering Group agenda and minutes are held on the website. See Appendix 11.</p>	<p>Little direct feedback has been received, although residents at the events commented on the content, being able to see the progress being made by the Steering Group and it being a useful resource to find information, key documents, agendas and minutes for the Steering Group meetings.</p>

4.4. Social Media

WHO WAS CONSULTED	HOW THEY WERE CONSULTED	WHAT RESPONSE WAS RECEIVED
<p>Users and followers of Blakeney Parish Council; mainly residents and local businesses stakeholders.</p>	<p>Updates were shared via Facebook to promote activities and consultation events.</p>	<p>Many second homeowners keep up to date with village activities in this way.</p>

4.5. Articles in the Glaven Valley Newsletter

WHO WAS CONSULTED	HOW THEY WERE CONSULTED	WHAT RESPONSE WAS RECEIVED
<p>Households and businesses throughout Blakeney and also the surrounding villages.</p>	<p>Articles were published in the Glaven Valley Newsletter about the Blakeney Neighbourhood Plan as it was developed and also advertising the Community Events.</p> <p>See Appendix 12 for the full articles.</p>	<p>Residents made reference to seeing the articles at the community events. Sharing that they found these to be informative about what had happened, useful next steps and giving key dates.</p>







4.6. Statutory Consultation

4.7. In accordance with the Neighbourhood Planning Regulations 2012 (and subsequent updates) the following statutory consultations were undertaken:

4.8. Application for Designation of Neighbourhood Area

WHO WAS CONSULTED	HOW THEY WERE CONSULTED	WHAT RESPONSE WAS RECEIVED
Statutory bodies, key stakeholders, parish and town councils, residents and individuals with access to North Norfolk District Council's website.	North Norfolk District Council publicised the application. The application form, supporting statement and map illustrating the designated area were published on the Council's website.	North Norfolk District Council resolved to approve the designation of the Blakeney Neighbourhood Area on 30 th November 2017. (See Appendices 1 and 2).

4.9. Pre-Submission draft Neighbourhood Plan – Regulation 14

WHO WAS CONSULTED	HOW THEY WERE CONSULTED	WHAT RESPONSE WAS RECEIVED
Using all the communication channels residents and businesses of Blakeney, stakeholders and statutory consultees. The Regulation 14 consultation consultees is covered in paragraphs 5.9 to 5.12. of this document and Appendix 14.	Various communication methods were used to publicise the pre-submission consultation, including: <ul style="list-style-type: none">  Newsletter  Posters  Email  Website  Social Media  Glaven Valley Newsletter To provide additional help, support and explanation two community support events were held. More details of the events can be found in paragraphs	A total of 36 responses were received, from residents, councils, Historic England, Norfolk Constabulary, land agents, National Grid, Norfolk Wildlife Trust and Environment Agency to name a few. Each of the responses is recorded in full in Appendix 14 of this document.

	5.6. through to 5.10. of this document.	
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4.10. Habitat Regulation Assessment Screening Report (HRA)

WHO WAS CONSULTED	HOW THEY WERE CONSULTED	WHAT RESPONSE WAS RECEIVED
As the responsible statutory body Natural England.	North Norfolk District Council completed the Habitat Regulation Assessment Screening Report and requested Natural England to give their 'opinion'.	<p>The determination in paragraph 4.1 concludes that the Blakeney Neighbourhood Plan would not have any adverse effects upon the integrity of the European sites and does not require a Habitats Regulation Assessment.</p> <p>Natural England responded to the HRA consultation on 17th March 2021 see HRA Determination document page 12.</p>

4.11. Strategic Environmental Assessment Determination

WHO WAS CONSULTED	HOW THEY WERE CONSULTED	WHAT RESPONSE WAS RECEIVED
The Environment Agency, Historic England and Natural England.	The three statutory bodies were sent by email the Strategic Environmental Assessment Screening Report for Consultation March 2021.	<p>The Environment Agency and Natural England both responded to the SEA consultation and agreed with the determination that the draft Blakeney Neighbourhood Plan does not require an SEA to be undertaken.</p> <p>No comments were received from Historic England.</p> <p>See BNP SEA Determination document 26th April 2021 for full details.</p>

4.12. Community Consultation

4.13. A number of public consultation events were held to encourage community involvement in the development of the Blakeney Neighbourhood Plan.

4.14. The following events were held at key stages during the neighbourhood planning process:

- ✚ Introduction to Neighbourhood Planning presentation and Q&A Session
- ✚ Neighbourhood Plan Launch Consultation Event
- ✚ Presentation and Q&A Session at the Annual Parish Meeting in March 2018 – **Blakeney Neighbourhood Planning – its happening, so come and be part of it.**
- ✚ Questionnaire
- ✚ Vision and Objectives Consultation Event
- ✚ Policy Development Workshops
- ✚ ‘Pre-Submission’ Community Event
- ✚ ‘Pre-Submission’ Support Consultation Event



4.15. The events and activities were publicised in the following ways:

- ✚ Glaven Valley Newsletter
- ✚ Parish Council website
- ✚ Social Media
- ✚ Posters were displayed around the village.
- ✚ Invites were sent to consultees and stakeholders.

4.16. Annual Parish Meeting

Date: March 2017

Location: Blakeney Village Hall

AIMS OF THE EVENT	WHO WAS CONSULTED	HOW THEY WERE CONSULTED
<ul style="list-style-type: none"> ✚ Introduce neighbourhood planning to residents and stakeholders ✚ To gauge local support for the 	<p>Residents, Parish Councillors, District Councillor and County Councillor. Many of the local Groups and societies were represented.</p>	<p>A presentation was given, as part of the Annual Parish Meeting, to introduce the concept of neighbourhood planning and to set out the purpose of and benefits associated with Blakeney</p>

<p>completion of a Neighbourhood Plan for Blakeney.</p>		<p>having its own Neighbourhood Plan.</p> <p>The process and stages for developing a neighbourhood plan were outlined.</p> <p>This was followed by a Question and Answers session.</p> <p>See Appendix 5 for meeting.</p>
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WHAT RESPONSE WAS RECEIVED

A positive response was received with many members of the audience asking questions and encouraging the Parish Council to undertake the development of a Neighbourhood Plan.

4.17. Neighbourhood Plan Launch Event

Date: 3rd February 2018
 Location: Blakeney Village Hall



AIMS OF THE EVENT	WHO WAS CONSULTED	HOW THEY WERE CONSULTED
<ul style="list-style-type: none"> ✚ To launch the Blakeney Neighbourhood Plan, share thoughts and ideas. ✚ To gather the views of residents, businesses and stakeholders about Blakeney – what they 'liked most', 'liked least' and would 'change' ✚ To explain the next steps in the neighbourhood plan process. 	<p>Residents, businesses and key stakeholders were invited to attend the event and have their say.</p> <p>The event was open to everyone and anyone who wanted to attend.</p>	<p>The entire Village Hall was taken over.</p> <p>A number of visual displays were set up to enable people to look around and prompt questions.</p> <p>Interactive boards asked those attending to express their views on Blakeney in three key areas:-</p> <ul style="list-style-type: none"> ✚ Liked most ✚ Least liked ✚ Would change

		<p>Each person attending placed a 'coloured dot' on a map of the Blakeney Neighbourhood Area to indicate where they lived.</p> <p>See Appendix 13.</p>
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WHAT RESPONSE WAS RECEIVED

Local residents supported the event and were intrigued to find out more about neighbourhood planning, how they could participate and what the outcomes would be. The responses to the three key questions have been collated and the results are recorded in the presentation given at the Annual Parish Meeting on 15th March 2018 and can be seen in Appendix 5.

Also attending the event and giving her support was the local District Councillor.

Concern was raised about North Norfolk District Council's emerging Local Plan, specifically the site allocations process as many sites in and around Blakeney had been put forward through the 'call for sites' process.



4.18. Annual Parish Meeting



Date: 15th March 2018

Location: Blakeney Village Hall

AIMS OF THE EVENT	WHO WAS CONSULTED	HOW THEY WERE CONSULTED
<ul style="list-style-type: none"> ✚ To promote and aid understanding of the Blakeney Neighbourhood Plan ✚ To seek input – “It’s happening, so come and be part of it.” (agenda item 3) ✚ To identify areas of importance that could inform the objectives and village questionnaire. ✚ To explain the next steps in the neighbourhood plan process. 	<p>Residents, Parish Councillors, District Councillor and County Councillor. Many of the local Groups and societies were represented.</p>	<p>A presentation was given, as part of the Annual Parish Meeting, to give the initial feedback from the Community Event in February.</p> <p>Those residents present were asked by the Chairman of the Steering Group to participate and invited to detail areas that were important to them, could be used guide the content of a village wide questionnaire and may be included in the vision, aims and objectives.</p> <p>Everyone was invited to write down topics that they felt were important for the future of the village. This input was used by the Steering Group to inform a questionnaire.</p> <p>This was followed by a Question and Answers session.</p> <p>See Appendix 5 for meeting presentation,</p>
WHAT RESPONSE WAS RECEIVED		
<p>The presentation outlining the initial thoughts of the Parish Council on their aims for the Blakeney Neighbourhood Plan and the possible benefits it could bring to the village prompted discussion and questions.</p> <p>The initial feedback from the launch event a few weeks earlier in February where residents said what they most and least liked and would change about Blakeney was shared. This received general agreement with those present with particular ‘likes’ being – close-knit community, the beautiful landscapes and the local SPAR shop. While the noticeable dislikes were affordability of homes, the impact of second homes and transport issues, although a number of respondents said they disliked very little or nothing.</p> <p>Not surprisingly in the ‘what would you change?’ section included development and access to affordable homes, transport improvements and also highlighted more local employment.</p> <p>See appendix 5 for more details.</p>		

4.19. Questionnaire

Date: April 2018

AIMS OF THE ACTIVITY	WHO WAS CONSULTED	HOW THEY WERE CONSULTED
<ul style="list-style-type: none">  To gather the views of residents about their priorities for Blakeney.  To seek and get wider engagement and participation in the neighbourhood planning process. 	<p>Every household and in Blakeney</p>	<p>A printed questionnaire was hand delivered to every household in Blakeney.</p> <p>This was followed up by door knocking to give more explanation and to encourage responses.</p> <p>The questionnaire was delivered just before Easter with a view to also enable any second homeowners, staying for the holidays, to complete and return.</p> <p>See Appendix 7 for the questionnaire</p>
WHAT RESPONSE WAS RECEIVED		
<p>Over 200 completed questionnaires were returned to the Parish Office and the Steering Group used the responses to draft the Objectives for the Blakeney Neighbourhood Plan.</p> <p>The rankings of the questionnaire can be seen in the Blakeney Neighbourhood Plan in Figure 1 in paragraph 3.11 on page 17.</p>		

4.20. Community Event – Vision, Objectives and Policy Statement Questions and Direction

Date: 28th July 2018

Location: Blakeney Village Hall

AIMS OF THE EVENT	WHO WAS CONSULTED	HOW THEY WERE CONSULTED
<ul style="list-style-type: none"> ✚ To seek views and input into policy development. ✚ To give feedback from the first community event on 'likes, dislikes and changes' plus the Vision and Objectives. ✚ To update on the emerging Local Plan on publicise and support the Pre-Submission draft Blakeney Neighbourhood Plan. ✚ To address concerns raised ✚ To explain the next steps in the neighbourhood plan process. 	<p>Residents, businesses and key stakeholders were invited to attend the event and have their say.</p> <p>The event was open to everyone and anyone who wanted to attend.</p>	<p>Interactive boards asked those attending to express their views on a large number of comments and questions around the key themes:-</p> <ul style="list-style-type: none"> ✚ Natural Environment ✚ Transport & Access ✚ Built Environment ✚ Community Amenities ✚ Economy & Tourism <p>A number of visual displays were set up to present feedback from the first community event on the three questions asked :-</p> <ul style="list-style-type: none"> ✚ Liked most ✚ Least liked ✚ Would change <p>See presentation in Appendix 5 for more details.</p> <p>The Vision and Objectives were displayed in the first group of display boards.</p>



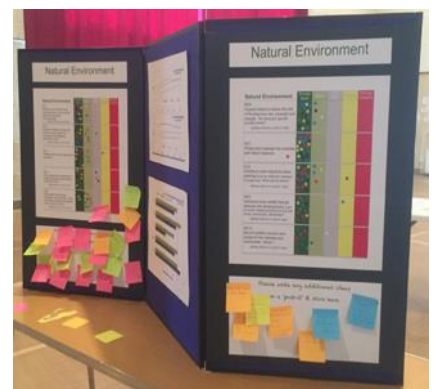
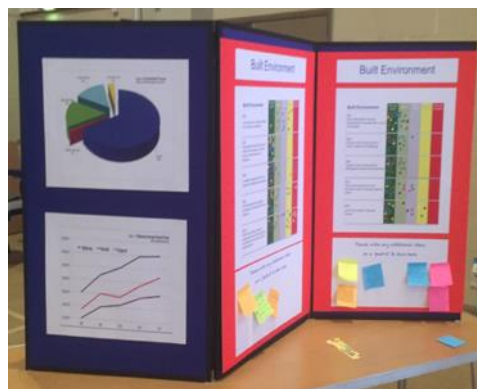


WHAT RESPONSE WAS RECEIVED

The Vision and Objectives received support while the series of questions and comments on the inactive boards under the five themes prompted many questions and discussions as residents decided whether they supported or disagreed with the questions and comments. As well as writing additional comments on the boards.

With North Norfolk District Council having now stated that site BLA04/A is their preferred choice of site for the growth in Blakeney caused a great deal of consternation with residents that did not agree with the District Council's choice.

Each person attending placed a 'coloured dot' on a map of the Blakeney Neighbourhood Area to indicate where they lived.



4.21. Annual Parish Meeting

Date: 14th March 2019

Location: Blakeney Village Hall



AIMS OF THE EVENT	WHO WAS CONSULTED	HOW THEY WERE CONSULTED
<ul style="list-style-type: none"> ✚ To continue the community engagement in the Blakeney Neighbourhood Plan ✚ To seek input – “It’s happening, so come and be part of it.” (agenda item 3) ✚ To explain the next steps in the neighbourhood plan process, specifically to raise awareness of the pre-submission 6-week consultation and to encourage responses. 	<p>Residents, Parish Councillors, District Councillor and County Councillor. Many of the local Groups and societies were represented.</p>	<p>The Chairman of the Steering Group gave a presentation to the Annual Parish Meeting.</p> <p>The Blakeney Neighbourhood Plan Vision and Objectives were shared.</p> <p>Explaining how the policies were being developed and went through a few of them.</p> <p>Explanation was given on the process, stages and future stages.</p> <p>A question and answers session was undertaken.</p>



WHAT RESPONSE WAS RECEIVED

The Steering Group Chairman's presentation was well received and gave feedback on the questionnaire and how the outcomes had shaped the Vision and Objectives – which were shared.

He also shared aspects of the policy development, specifically Policy 1 - Affordable Homes for Local People, Policy 13 - Open Space Preservation and Policy 15 - Local Employment.

Questions from the room were: -

1. 'Subject to independent examination.' What does that entail?
2. There is to be a new Local Plan from NNDC which appears to be moving in very similar ways to the Neighbourhood Plan policies?
3. Do you have input into the independent examination?
4. The Neighbourhood Plan Policies are legally binding. Is there an Appeal process?
5. Does the independent examiner give feedback?

The Steering Group Chairman and Parish Council Chairman answered the questions.



4.22. Workshops with North Norfolk District Council

Date: 23rd March and 5th July 2019

Location: Blakeney Parish Council Office

AIMS OF THE EVENT	WHO WAS CONSULTED	HOW THEY WERE CONSULTED
<p>23rd March 2019</p> <ul style="list-style-type: none"> ✚ To discuss the initial draft emerging policies and receive feedback from North Norfolk District Council Officers. ✚ To review Informal response given by Planning Officers ✚ To agree policies for inclusion in the Blakeney Neighbourhood Plan. 	<p>Workshop was by held as part of the Steering Group Meeting and was open to anyone to attend to observe.</p> <p>Those in attendance were nine members of the Steering Group, Karen Ward (the local District Councillor), Stuart Harrison, Planning Officer North Norfolk District Council, and Graham Connelly Housing Enabler Officer North Norfolk District Council.</p>	<p>Stuart Harrison presented North Norfolk District Council's initial comments, which had been circulated in a document earlier on the day, and he talked through thoughts on the initial Draft Blakeney Neighbourhood Plan - see Appendix 8.</p>
<p>5th July 2019</p> <ul style="list-style-type: none"> ✚ To discuss and work through the "Built Environment" suite of policies. ✚ Update on North Norfolk District Council's Site Allocation preference. 	<p>Workshop was by held as a specific meeting with the Steering Group and Planning Officers.</p> <p>Those in attendance were eight members of the Steering Group plus Stuart Harrison and Iain Withington, Planning Officers from North Norfolk District Council.</p>	<p>A round table discussion allowing for two way conversations and exploring of ideas and outcomes.</p>
WHAT RESPONSE WAS RECEIVED		
<p>23rd March 2019</p> <p>A useful exchange of views that should help understanding, with ways to progress and a commitment from Planning Officers to facilitate further workshops. See Appendix 8 for the North Norfolk District Council's document. The approach to each policy is captured after each section of the document in 'Blue text' in the sections titled "NPSG Comments and Suggested Ways Forward From Workshop"</p>		

5th July 2019

Planning Officers were positive in their language, appeared more focused on what the BNHP was trying to achieve and listened to what was said.

The Officers agreed that most of the policies in the BNHP could remain although the impact of some of the policies would be small.

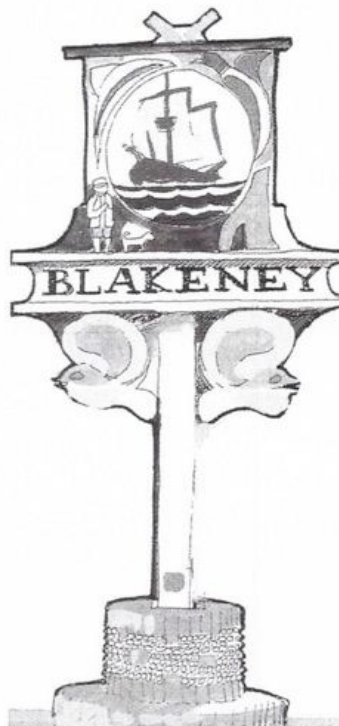
The Steering Group were aware that the scale of change and recognised it might be small but that it was good to start somewhere to address the issues.

There were some elements in the policies that the Officers were uncomfortable with.

The Steering Group members present at the Workshop felt that the Planning Officers had moved forward in their views on the allocation of Affordable Homes. The layout of the BNHP was discussed and it had been decided to revert to the initial format. The objective evidence and justification were discussed, however much of the specific details were available and had been produced and contained either within the BNHP or Data Baseline document. The Officers welcomed the layout changed and that the supporting text would be located with the policies.

Site Allocations was discussed and it was agreed that no allocations would come forward as part of the BNHP.

The pros and cons of reviewing the Settlement Boundary was covered with the Steering Group not seeing any need to alter the settlement boundary as part of the neighbourhood planning process.



4.23. ‘Pre-Submission’ Community Events

Date: 22nd and 23rd October 2019

Location: Blakeney Village Hall



AIMS OF THE EVENT	WHO WAS CONSULTED	HOW THEY WERE CONSULTED
<ul style="list-style-type: none"> ✚ To encourage responses to the 6-week Pre-submission consultation. ✚ To present the Blakeney Neighbourhood Plan to residents. ✚ To understand any concerns and how the Blakeney Neighbourhood Plan may need to change or be updated. ✚ To ensure residents are aware of the closing date to get responses back. ✚ To explain the next steps in the neighbourhood plan process. 	<p>Residents, businesses and key stakeholders were invited to attend the event and have their say.</p> <p>The event was open to everyone and anyone who wanted to attend.</p>	<p>Members of the Steering Group were on hand to answer questions and provide support.</p> <p>The Blakeney Neighbourhood Plan was deconstructed and the policies presented on display boards with explanatory text.</p> <p>Teas and coffees were served to encourage people to sit down, talk, question and complete a response form.</p> <p>Hard copies of the Blakeney Neighbourhood Plan, including one extra large A3 size copy, were available to read, as was the Blakeney Baseline Data document.</p>



WHAT RESPONSE WAS RECEIVED

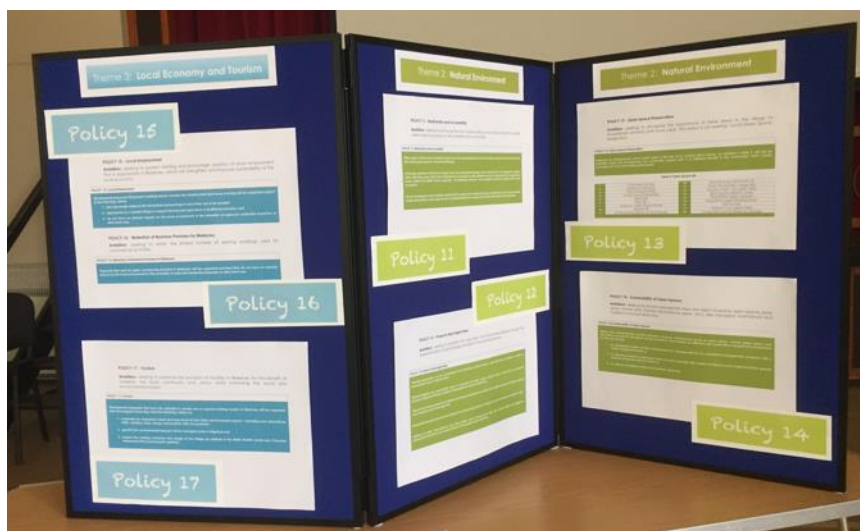
At both events many residents took the opportunity to sit down and discuss the Blakeney Neighbourhood Plan and its policies – questioning the expected outcomes aligned to their own thoughts – with some completing the feedback response form immediately while others wanted to consider what they had seen and make use of the online feedback response form.

The responses received have been all been recorded within the Pre-Submission Consultation Responses (see Appendix 14 of this document) with the feedback considered by the Steering Group who have made changes based on the submissions – these are also documented in Appendix 14.

One resident said of the second event that they attended.....

“Firstly, it was good to meet you last Wednesday at the Blakeney Neighbourhood Plan road show in the village Hall.

Secondly, I should like to congratulate the Blakeney Neighbourhood Plan Committee for putting together a very comprehensive and fair Draft Plan. There is a lot of info contained within which makes interesting reading.”



5. Pre-submission (Regulation 14) Consultation

5.1. Background

5.2. This section of the Consultation Statement demonstrates how the draft Blakeney Neighbourhood Plan pre-submission consultation fulfills Regulation 14 of the Neighbourhood Planning (General) Regulations 2012. This regulation requires that:

5.3. **“Before submitting a plan proposal to the local planning authority, a qualifying body must –**

- ✚ publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area [with]
 - ✚ details of the proposals for a neighbourhood development plan;
 - ✚ details of where and when the proposals for a neighbourhood development plan may be inspected;
 - ✚ details of how to make representations; and
 - ✚ the date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;
- ✚ consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and
- ✚ send a copy of the proposals for a neighbourhood development plan to the local planning authority.”

5.4. Formal Pre-submission Consultation Period

5.5. The pre-submission draft Blakeney Neighbourhood Plan were prepared and circulated for a statutory Regulation 14 consultation period running from Thursday 3rd October to Friday 15th November 2019.

5.6. How it was publicised?

5.7. Residents, businesses of Blakeney, stakeholders and statutory consultees were informed of the commencement of the pre-submission consultation on the draft Blakeney Neighbourhood Plan and Sustainability Appraisal Report.

5.8. Details of how to see and comment on the documents including the consultation date were publicised using a wide range of media to ensure the message was communicated as widely as possible:

- ✚ The Neighbourhood Plan section on the Blakeney Parish Council website blakeneyparishcouncil.org.uk explained the process, key dates, how to comment. The electronic copy of the documents were available online to download from the dedicated web page.
- ✚ Printed copies of the pre-submission version of the Blakeney Neighbourhood Plan were available to view at and borrow from the Parish Council Office and blank Response Forms were available to take away and complete.

5.9. Statutory consultees and other stakeholders were informed of the start of the pre-submission consultation by email and invited to review and comment by 15th November 2019.

5.10. The email also included an invite to the pre-submission community events on 22nd and 23rd October 2019 (see Appendix 6).

5.11. **Who was consulted**

5.12. A list of key stakeholders was contracted comprising residents (who had provided their email address), landowners, local businesses, neighbouring parish councils, North Norfolk District Council, Norfolk County Council, statutory consultees, developers and key service providers.

5.13. **Document Access**

5.14. Copies of the pre-submission draft Blakeney Neighbourhood Plan and Sustainability Appraisal Report were made available in both paper and digital formats.

- ✚ Paper copies of the draft Blakeney Neighbourhood Plan, including an A3 large print version, Response Form and Sustainability Appraisal Report were available to view at the Parish Council Office and at the two pre-submission public consultation event at Blakeney Village Hall on 22nd and 23rd October 2019.
- ✚ Digital copies of the draft Blakeney Neighbourhood Plan were available online to download with the Response Form from the Parish Council website at <http://www.blakeneyparishcouncil.org.uk> .

5.15. Response Methods

- 5.16. To encourage feedback on all areas of the pre-submission draft Neighbourhood Plan and Sustainability Appraisal Report a Response Form was produced and all consultees were invited to give their comments by completing and returning the Response Form.
- 5.17. The Response Form was available to download from the website as a stand-alone document, it was also included as an Appendix to the draft Blakeney Neighbourhood Plan.
- 5.18. Printed copies of the Response Form were handed out to everyone at the two 'Pre-Submission' community events on 22nd and 23rd October 2019. A number of Response Forms were completed and handed in at this event.



- 5.19. The completed Response Forms were also returned to the Parish Council Office, Langham Road, Blakeney, Norfolk. NR25 7PG either by hand or post. Or by email to clerk@blakeneyparishcouncil.org.uk.

5.20. Responses Received

- 5.21. In total, 36 consultation responses were received by the end of the formal consultation period, which ended on 15th November 2019.
- 5.22. The Response Form listed the policies and asked consultees whether they agreed (YES or NO) with each of them, to state fully and clearly their comments or concerns against each policy and what changes or alternative approach should be taken.
- 5.23. The Response Form also asked consultees if they considered there were any omissions from the draft Blakeney Neighbourhood Plan.



5.24. Summary of Main Issues & Concerns

5.25. All 36 of the complete Response Forms returned during the consultation have been reproduced in full in Appendix 14. The main issues and concerns raised by consultees are summarised below -

- ✚ Impact of new development on the character of the village
- ✚ Site allocations linked to the emerging Local Plan
- ✚ Affordability of homes and local residents being priced out of the market
- ✚ Second home ownership
- ✚ Light pollution

5.26. Addressing Issues and Concerns

5.27. The Steering Group considered each of the issues and concerns raised through the Pre-submission consultation and agreed a response to each, including any resulting actions and amendments to the Blakeney Neighbourhood Plan. The issues and concerns raised together with the agreed response is recorded in Appendix 14.

5.28. Where considered relevant, details are also recorded to indicate how the issue or concern has been addressed in the draft Blakeney Neighbourhood Plan.

6. Conclusion

- 6.1. This Consultation Statement document shares the consultation activity that took place as part of developing the draft Blakeney Neighbourhood Plan.
- 6.2. It provides evidence that in producing the draft Blakeney Neighbourhood Plan there has been a significant amount of successful consultation with the local community, stakeholders, consultees and businesses that potentially have a stake in the future of Blakeney and the Neighbourhood Plan.
- 6.3. The Consultation Statement documents shares the feedback received during the neighbourhood planning process, the comments made through the consultations and, where necessary and appropriate, how the comments received have been considered in developing the draft Blakeney Neighbourhood Plan.
- 6.4. The draft Blakeney Neighbourhood Plan has sought to take account of these comments where necessary and appropriate to comply with the Government's National Planning Framework, the strategic Core Strategy and emerging Local Plan.
- 6.5. **This Consultation Statement and the supporting consultation reports are considered to comply with Section 15(2) in Part 5 of the 2012 Neighbourhood Planning Regulations.**



7. Appendices

- Appendix 1: Neighbourhood Area Application
- Appendix 2: Approval of Neighbourhood Area Designation
- Appendix 3: Steering Group Terms of Reference
- Appendix 4: Communication Strategy
- Appendix 5: Annual Parish Meetings
- Appendix 6: Stakeholder Letter and Key Consultee List
- Appendix 7: Village Questionnaire
- Appendix 8: Workshops with North Norfolk District Council
- Appendix 9: Emerging Policies – Statement Review
- Appendix 10: Newsletters and Posters
- Appendix 11: Website
- Appendix 12: Glaven Valley magazine
- Appendix 13: “Dot’ Map
- Appendix 14: Pre-submission Consultation Responses

Appendix 1

Neighbourhood Area Application

BLAKENEY PARISH COUNCIL

Vat Reg. No. 287 8491 92

Clerk to the Council – Mrs. Tracey Bayfield (Cert H.E. Local Policy)
The Parish Office, Langham Road, Blakeney, Holt, Norfolk, NR25 7PG
www.blakeneyparishcouncil.co.uk
E-mail: clerk@blakeneyparishcouncil.co.uk
Telephone or Fax (01263) 741106

Parish Office Open to the Public
Tuesday & Thursday 9am – 11am

Iain Withington
Planning Policy Team Leader
North Norfolk District Council
Holt Road
Cromer
Norfolk
NR27 9EN

17th November 2017

Dear Iain

Re: Application for a Neighbourhood Area

Further to my submission form dated 7th November 2017 and accompanying map identifying the area to which this application relates, please find below the additional information as requested.

Appropriate Area – Blakeney Parish Council has been considering the production of a Neighbourhood Plan for some time now, and at the Full Council meeting on 8th November 2017, a contract was signed between Blakeney Parish Council and a Neighbourhood Planning Consultant.

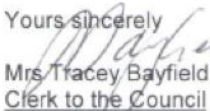
The Parish Council agreed that the obvious choice for the designated Neighbourhood Area would be the Parish Boundary.

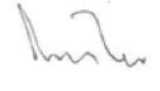
There are two main reasons why the Parish Council thinks that a Neighbourhood Plan should be produced for the area;

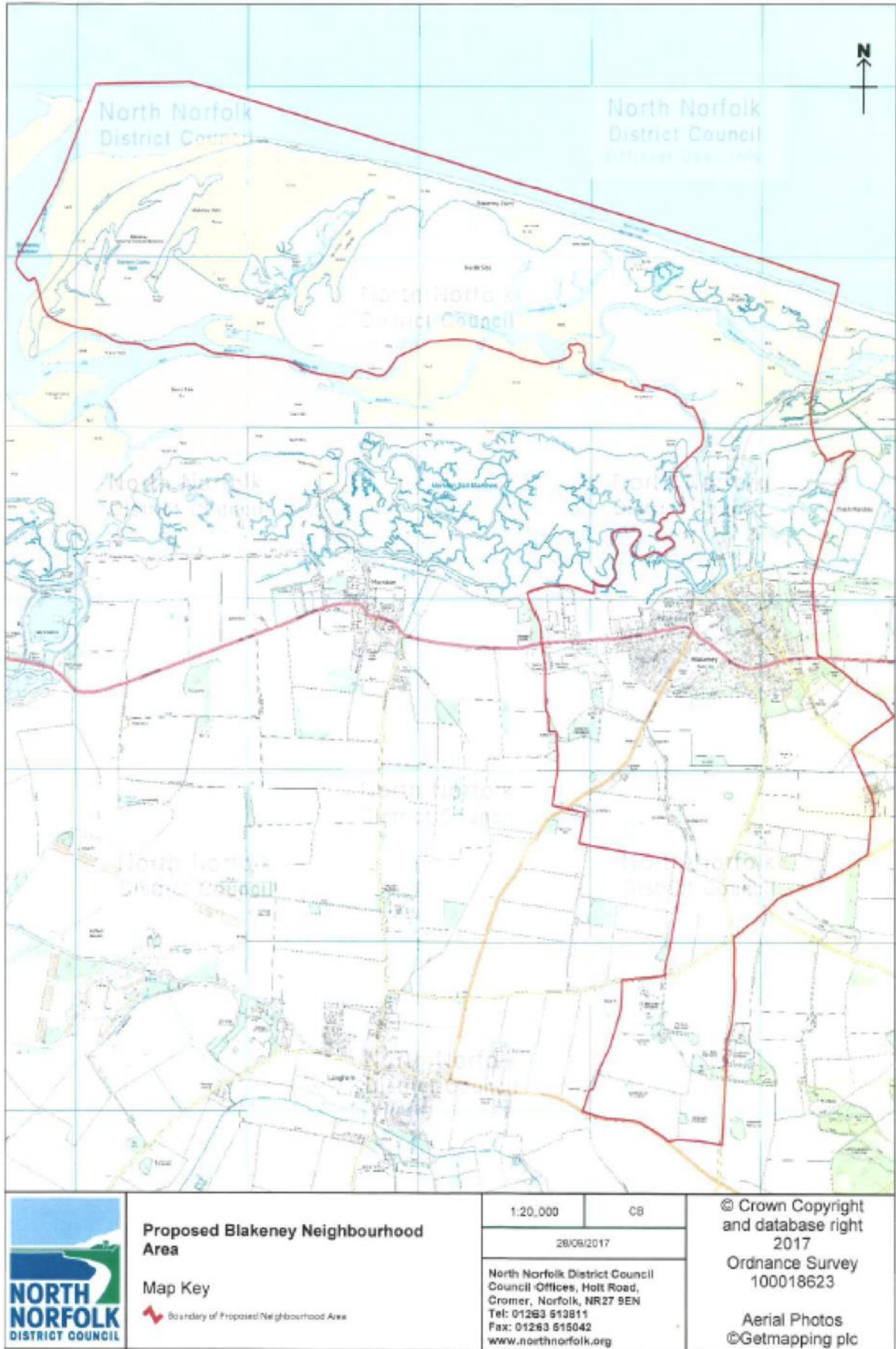
- 1) To ensure that planning decisions are consistent with the Parish Councils endeavour to maintain the unique nature of the village in its position as an Area of Outstanding Natural Beauty and a Conservation Area.
- 2) Secondly to enable affordable housing to be built as appropriate to allow young people from the village to continue to reside here.

Relevant Body – Blakeney Parish Council is the relevant body to apply for the designation of a Neighbourhood Plan, in accordance with section 61G of the 1990 Act and section 5C of the 2012 Regulations.

I hope that you find the above sufficient and we look forward to hearing from you.

Yours sincerely

Mrs Tracey Bayfield
Clerk to the Council


Rosemary Thew
Chairman



Appendix 2

Approval of Neighbourhood Area Designation

NORTH NORFOLK DISTRICT COUNCIL
HOLT ROAD CROMER NORFOLK NR27 9EN
Telephone 01263 513811
Fax 01263 515042
www.northnorfolk.org



30th November 2017

Mrs Tracey Bayfield
Parish Clerk
Blakeney Parish Council
The Parish Office
Langham Road, Blakeney,
Holt, Norfolk,
NR25 7PJ

Our Ref: 967/12/01/06

RE: Application to Designate a Neighbourhood Planning Area

Dear Mrs Bayfield,

Thank you for your application and supporting statement on behalf of Blakeney Parish Council to designate the parished area of Blakeney as an area to undertake neighbourhood planning. This was successfully validated on the 22.11.17.

We can advise that in accordance with the Neighbourhood Planning (General) and Development Management procedure (Amended) Regulation 2016 through delegated authority of the Planning Portfolio holder in conjunction with the planning Policy Manager it is resolved to approve the designation of the proposed Neighbourhood Plan Area which covers the entire parish, as received with your statement on the 22.11.17.

The map showing the designated area, application form and supporting statement will be published on the council's web site:

<https://www.north-norfolk.gov.uk/tasks/planning-policy/neighbourhood-planning/>

Cllr Sue Arnold - Planning Portfolio Holder NNDC

A handwritten signature in blue ink, appearing to read 'S. Arnold', is written over a horizontal dashed line.

Nicola Baker – Head of Planning NNDC

A handwritten signature in blue ink, appearing to read 'Nicola Baker', is written over a horizontal dashed line.

Information

The District Council, as the responsible body, will also publish at key stages other emerging neighbourhood plan documents of the Blakeney neighbourhood plan, however it remains the responsibility of the parish council to ensure the local community are kept up to date and informed with progress and we would recommend that a suitable page is created on the parish council's own web site.

We strongly encourage the parish council and or steering group to seek early and continued engagement from policy officers throughout the development of the neighbourhood plan. A number of specific local guidance notes and check sheets have been produced and will be added to in due course and are available at: <https://www.north-norfolk.gov.uk/tasks/planning-policy/neighbourhood-planning/> In addition the growing evidence base of the local plan is available in the document library <https://www.north-norfolk.gov.uk/tasks/planning-policy/document-library/> Officers may also be able to assist in helping identify suitable supporting evidence once the policy areas are known.

We would be happy to schedule a meeting with the parish council or neighbourhood plan steering group once formed to discuss the process, the level of support that is available from officers at the council, the proposed content/requirements, and the envisaged time line as well as provide an understanding of the emerging Local Plan. It is this plan that the neighbourhood plan will need to be in general conformity with, please see guidance note NPG2 on the above link. It may be that as the Local Plan progresses we can add supporting text to the emerging Local Plan in order to assist the parish in its land use aims. We can also share emerging evidence, provide appropriate contacts, advise on national policy and sources of grant funding, provide a limited amount of technical support and advise on the appropriate approaches and methodology. As the responsible body when the time comes and following a detailed screening request we will undertake the Strategic Environmental Assessment screening assessment of the emerging neighbourhood plan on your behalf.

We would strongly advise not to get too far down the process without first seeking our support/advice and we look forward to meeting members of the steering group in due course.

Yours sincerely,

Iain Withington
Planning Policy Team Leader
iain.withington@north-norfolk.gov.uk
01263 516034

Appendix 3

The Steering Group Terms of Reference and Membership

Blakeney Neighbourhood Plan

Steering Group Terms of Reference

Name

The name shall be the Blakeney Neighbourhood Plan Steering Group, hereafter referred to as the Neighbourhood Plan Steering Group (NPSG).

Purpose

The main purpose of the NPSG is to develop and oversee the preparation of a Neighbourhood Plan for the Parish of Blakeney on behalf of the Parish Council, ensuring that policies and proposals therein seek to address the community's aspirations for the area.

Key Roles

1. Ensure that Neighbourhood Planning legislation, as set out in the Neighbourhood Planning (England) Regulations 2012 and subsequent amendments, is followed in the preparation and submission of the Neighbourhood Plan.
2. To steer and provide management of the Neighbourhood Plan for the Parish Council, by ensuring the project timetable and key milestones are met.
3. Review and quality check work that is undertaken.
4. Assess existing evidence about the needs and aspirations of the Parish, identifying specific areas of evidence and analysis as required.
5. Agree a communication, consultation and engagement strategy to identify ways of gathering views of the whole community, including residents, groups, businesses, landowners etc....., in order to inform the development of the Neighbourhood Plan.
6. Report to the Parish Council on progress and outcomes in the preparation of the Neighbourhood Plan and make recommendations on any proposed content of the Neighbourhood Plan.
7. Liaise with relevant authorities and organisations in order to make the Neighbourhood Plan as effective as possible.

Blakeney Neighbourhood Plan

8. To be responsible for the analysis of evidence gathered from the community and elsewhere, the development of local policies, and the production of the Neighbourhood Plan.
9. Actively publicise events, workshops and the Neighbourhood Plan prior to the local referendum.
10. Identify sources of grant funding.
11. Write the Terms of Reference for any Working Groups prior to their establishment.

Membership and Quorum

The NPSG will comprise up to 12 members, including representatives of the Parish Council, Project Officers, landowners and any interested members of the community, as approved by the Parish Council (see Appendix A).

The NPSG may co-opt additional members at its discretion, for the purpose of subject matter experts and additional resource requirements.

At the first meeting the NPSG will elect: a Chairman and Vice-Chairman. The Parish Clerk shall undertake the role of the Finance Officer. In all cases advance authority will be required for any expenditure from the Parish Council. No expenses will be paid without a receipt or invoice.

A person shall cease to be a member of the NPSG having notified the NPSG Chairman in writing of his or her wish to resign. In this event, the Chairman shall have the discretion to accept a nomination to fill the vacancy.

All members of the NPSG will behave in accordance with the Blakeney Parish Council Code of Conduct and must declare any personal interest that may be perceived as being relevant to any decisions or recommendations made by the NPSG. This may include membership of an organisation, ownership or interest in land or a business or indeed any other matter likely to be relevant to the work undertaken by the NPSG.

The NPSG shall be quorate when a minimum of four members are present.

Meetings

The NPSG shall meet at least every six weeks, or as required/determined by the Chairman.

Blakeney Neighbourhood Plan

Notice of NPSG meetings shall be given to its members, by email, at least five days in advance of the meeting date. Notices must include details of the matters to be discussed.

Decisions on operational matters (relating to the process of preparing the Neighbourhood Plan) shall be determined by a majority of votes of the NPSG members present. In the case of an equal number of votes, the Chairman shall have a casting vote.

Decisions on matters relating to the proposed content of the Neighbourhood Plan shall be made by the full Parish Council, following consideration of recommendations made by the NPSG.

The minutes shall be circulated to members of the NPSG not more than 14 days after each meeting.

Working Groups

The NPSG may form Working Groups (WGs), as it considers necessary, to carry out functions specified by the NPSG.

Each WG should have a nominated chairman but this person does not have to be a member of the NPSG.

WGs do not have the power to authorise expenditure on behalf of the NPSG and must seek advance authorisation for expenditure from the Finance Officer.

WGs will be bound by the Terms of Reference set out for them by the NPSG.

Changes to the Terms of Reference

These Terms of Reference may only be altered and additional clauses added by agreement of the Parish Council.

Signed on behalf of Blakeney Parish Council

.....
Chairman, Rosemary Thew
Blakeney Parish Council

Date

Blakeney Neighbourhood Plan

Appendix A – Steering Group Membership List

Blakeney NPSG – membership

1. Sam Curtis (Chairman)
2. Rosemary Thew (Vice-Chairman)
3. Jane Armstrong
4. Margaret Benson
5. Tracey Bayfield
6. Jenny Girling
7. Don Glaister
8. Helen Horabin
9. John Seymour
10. Iain Wolfe
11. Tom Green
12. Joanna Dawson

Appendix 4

Communication Strategy

Blakeney Neighbourhood Plan

Communication Strategy 2018

1.0 Executive Summary

The production of the Neighbourhood Plan is led by Blakeney Parish Council on behalf of the local community and for the current and future community of Blakeney.

It is important that ALL residents of Blakeney are given an opportunity to participate in developing the Neighbourhood Plan, shaping its Vision, Aims and Objectives as well as owning the policies that subsequently emerge.

A fundamental component of the Neighbourhood Plan is for the residents, stakeholders and interested parties from the local community of Blakeney to engage in and be engaged by the steps undertaken to complete the Neighbourhood Plan.

Ultimately, the Neighbourhood Plan can only be adopted (technical term is 'made') following a local referendum at which more than 50% of those voting, vote 'yes'.

The communication methods used to deliver the key messages of the Neighbourhood Plan will help local residents' understanding, see that their views are included so that they can support the overall Neighbourhood Plan.

The Communication Strategy will guide those directly (and indirectly) involved in the production of the Neighbourhood Plan. To put out clear and consistent messages to explain the journey being undertaken and the decisions being made.

2.0 Neighbourhood Plan Steering Group

Communication is important for the Parish Council and the Communication Strategy is facilitated by the NPSG, who have a key role in its delivery and implementation.

The Communication Strategy is designed as a dynamic document. A blueprint for how the Neighbourhood Plan Steering Group (NPSG) develops and delivers its messages.

3.0 Communication Action Plans

Communication Action Plans form part of this Communication Strategy and describe how key actions will be developed and delivered. This will enable the Parish Council and NPSG to ensure that the strategy is implemented and that it results in improved levels of understanding and recognition of the Neighbourhood Plan.

- Key actions are summarised at Appendix 1

4.0 The Target Audience

The primary target audience for messages about the Neighbourhood Plan through the different stages are the residents of Blakeney.

There are approximately 800 residents within the parish boundary in approximately 600 homes, including a large number of 'second' homes. Different channels of communication are required to ensure ALL our residents (including those difficult to reach); young and old people and those in minority groups.

In addition, there are a number of businesses, schools and clubs that need to be kept informed of the Neighbourhood Plan and given opportunities to have their say.

It will be necessary to ensure North Norfolk District Council, Norfolk County Council, Government, Statutory Bodies and other stakeholders are also kept informed and consulted.

5.0 What Needs to be Communicated?

The Parish Council and NPSG need to communicate activities relating to the Neighbourhood Plan: -

- what it is doing
- when it is doing it
- how people can engage
- expectations
- timescales involved
- achievements and results

6.0 Plain English

Government has a reputation for using jargon and not plain English, especially where planning is involved.

It is important we use language that the target audience can understand. To ensure readability, sentences should be short, well-structured and in plain English. Where 'jargon' is technically necessary it is to be accompanied with a definition or explanation.

7.0 Methods

As the intention of the Communication Strategy is to be dynamic, this document should be seen as a guide. The communication methods and approaches that it defines are a starting point. As new channels are identified and deemed appropriate they should be pursued and used without delay.

It is expected that most communication will be written and distributed. Wherever possible modern technologies should be used to support and enhance the messages. Email, web updates and social media may be more successful in targeting specific age profiles and groups.

7.1 The Glaven Valley Newsletter

Local residents seeking information, updates and local tradespeople read The Glaven Valley Newsletter each month. It is circulated widely across Blakeney and the wider area each month.

Articles will be placed in each monthly edition to give a high level message and an understanding of what the Neighbourhood Plan is, who is involved, detailing progress, achievements, contact details of how to get involved and publicising events and workshops.

7.2 Neighbourhood Plan Newsletter

Produced, at key stages, to expand in more detail on articles in The Glaven Valley Newsletter. The newsletters will build a storyboard of the journey taken and activities relating to the production of the Neighbourhood Plan.

7.3 Email

A quick and easy method of getting information delivered instantly to individuals, businesses and stakeholders.

Collection of email addresses should be instigated at the earliest opportunity to maximise the number of contact points and spread of information.

7.4 Social Media

Another quick and easy way to promote and publicise the Neighbourhood Plan and the events associated with it is social media.

7.5 Community Workshops and Consultation Events

These events create an opportunity to deliver a great deal of information, through display boards, presentations and face to face discussions to aid a wider understanding of neighbourhood planning in the local community. As well as to test and check back the outcomes and views with stakeholders.

7.6 Neighbourhood Plan Steering Group (NPSG) Meetings

As the NPSG meets every 4 to 6 weeks it creates an opportunity for local residents to attend and observe the NPSG at work, its deliberations, discussions and progress made.

8.0 Consultation

8.1 Local Community

As the draft Neighbourhood Plan is developed prior to being submitted for examination, it is imperative that the local community is also taken on that journey. Building an understanding of the neighbourhood planning activities and ensuring everyone who wants to, has had equal opportunity to have their say.

Key elements of consultation will be: -

- Designation of Neighbourhood Area
- Vision, Aims and Objectives for Blakeney
- Emerging statements and policies for the Neighbourhood Plan
- Draft Neighbourhood Plan

8.2 Stakeholders & Statutory Bodies

In consideration of the wider impact of the Neighbourhood Plan, it is necessary to engage key stakeholders, both from within the local community and the wider area. These include Local Authorities, Councils and national Statutory Bodies.

9.0 Referendum

Ultimately the Neighbourhood Plan can only be adopted, following a successful outcome at referendum. This means achieving a positive outcome - more than 50% of those voting, vote 'yes' at the local referendum.

It is fundamental, therefore, that the support of the local community is maintained throughout the process to ensure the content of the Neighbourhood Plan reflects their aspirations for the parish.

Communication Action Plan

Key Action	Reason / Outcome	Timescale
Articles in The Glaven Valley Newsletter.	<ul style="list-style-type: none"> To develop the journey & story of neighbourhood planning & activities. To publicise future events. To target existing readers. To target those that are less likely to use electronic methods. 	Monthly
Parish Council Meetings, Updates, minutes and newsletters.	<ul style="list-style-type: none"> To ensure specific identified needs of the local community are included. To update progress and key stages in the process. 	Monthly
Steering Group Meetings	<ul style="list-style-type: none"> To provide transparency of the choices made. Target people who want to get involved. 	Monthly
Neighbourhood Plan Newsletters	<ul style="list-style-type: none"> To impart more detailed information. To publicise future events. Develop the journey & story in more detail. To target every household & business. 	At key points throughout the process
Community Workshops & Events	<ul style="list-style-type: none"> To share information. To seek views, thoughts & comments. To check back & test outcomes. To seek consensus on outputs & priorities. To give opportunity to question & understand. Target people who want to get involved. 	At key stages

Blakeney Neighbourhood Plan - Communication Strategy

Key Action	Reason / Outcome	Timescale
Flyers & Posters	<ul style="list-style-type: none"> • Hand out at other local events & gatherings. • Simplify message. • Reinforce messages & reminders of events. 	Ad hoc
Email Updates	<ul style="list-style-type: none"> • Easy & cost effective. • Target those who have asked for updates & information. • Maintains engagement with community. 	Ad hoc
Social Media	<ul style="list-style-type: none"> • Build wider community engagement. • Better chance of reaching younger community members. • Ease & speed of use. • Spontaneous - people re-Tweet messages & share experiences. 	Ad hoc
Website	<ul style="list-style-type: none"> • Reference point for all to access, ask questions & share views. • Place to hold key messages & documents. • Easy access. 	Ongoing
Stakeholder List	<ul style="list-style-type: none"> • To identify important contributors. • Ensure opportunity for ALL to have input. 	Ongoing
Press Releases	<ul style="list-style-type: none"> • To inform the wider area of activities. • Official notices when required. 	Ad hoc

Appendix 5

Annual Parish Meetings

2017 – Agenda

2018 – Presentation

2017 Annual Parish Meeting Agenda

BLAKENEY - ANNUAL PARISH MEETING 2018

All residents on the current Register of Electors for the Parish of Blakeney – Your Annual Parish Meeting will be held in the Village Hall on **THURSDAY 15th MARCH 2018 at 7pm.**

We have speakers from a varying range of organisations and topics covered will include;

- **The Blakeney Neighbourhood Plan** – Preparation & looking forward - **Shaun Vincent** (Abzag Ltd) – The Village has started planning for the future. It is all about letting the people who know about & care for an area plan for it. A neighbourhood plan is led by the residential and business community, not the Council and is about land use and development, building neighbourhoods – not stopping growth. Come along and find out how to be a part of planning for the future of Blakeney.
- **The Glaven Valley Conservation Area Review** – **Sally Humphries** from ‘Purcell’ – Leading the Conservation Area Review on behalf of North Norfolk District Council. Sally will give a short overview of the work that they are doing and will share details of how it will sit alongside The Blakeney Neighbourhood Plan.

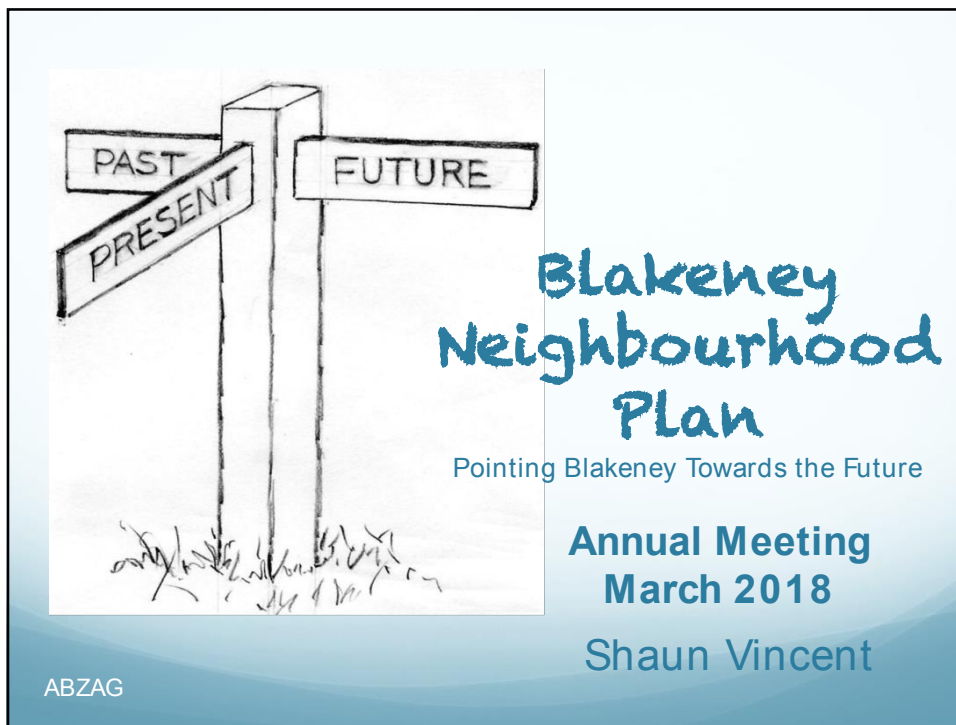
Other Community Groups and Charities may also provide displays and information which they would like to share with you. *(Tea/Coffee will be available when the doors open at 6.30pm. Do please come along to browse, chat or both!)*

Please note that this is not a Blakeney Parish Council Meeting, although their reports do form part of the agenda. Should a vote be called for upon any item on the agenda then the decision of said vote is not binding upon the Parish Council. It would however be reported back to the Parish Council.

AGENDA

1. **Welcome by the Chairman; Rosemary Thew & Apologies for Absence;** Alban Donohoe.
2. **To approve the minutes of the Annual Parish Meeting held on Thursday 16th March 2017.**
3. **Guest Speaker(s) –**
 - **THE BLAKENEY NEIGHBOURHOOD PLAN** – **Shaun Vincent** – It’s happening, so come and be part of it.


2018 – Annual Parish Meeting Presentation



1

What is a Neighbourhood Plan?

- Sets out planning policies for Blakeney that will be used to decide whether to approve planning applications
- Written by the local community, the people who know and love the area, rather than the Local Planning Authority (NNDC)
- Powerful tool to ensure the community gets the right types of development in the right place.



Localism Act 2011

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2

A Neighbourhood Plan

- is a legal planning document
 - due process, tested in a referendum
- allows residents to :-
 - have a say in how Blakeney will look in future
 - shape and direct development
 - set out a vision for Blakeney
 - identify key projects
- enable priorities to be set for
 - infrastructure
 - community facilities

Evidence
Justification

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3

Basic Conditions

A Neighbourhood Plan is tested to ensure it

- has appropriate regard to national policy
- contributes to the achievement of sustainable development
- is in general conformity with strategic policies in the development plan for local area
- is compatible with human rights requirements
- is compatible with EU obligations.



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What it is not

Neighbourhood planning is NOT about stopping houses being built



..... it is about guiding development

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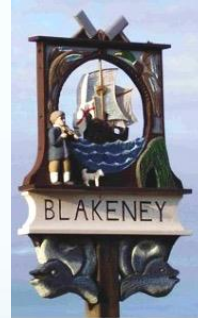
*'We hope to buy the first one
and then object to the other
199 being built'*

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6

How will a Neighbourhood Plan benefit Blakeney ?

- Stronger voice to influence development
- Improve future design of homes
- More funding and community benefits



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7

Parish Council

Pointing Blakeney Towards the Future

Aims

- To preserve the character of the village
- To build affordable housing for the needs of the village (Blakeney, not Norfolk)
- Define and enforce a balance of residential and second homes
- Preserve and support the development of business and employment opportunities
- Preserve and develop the amenities

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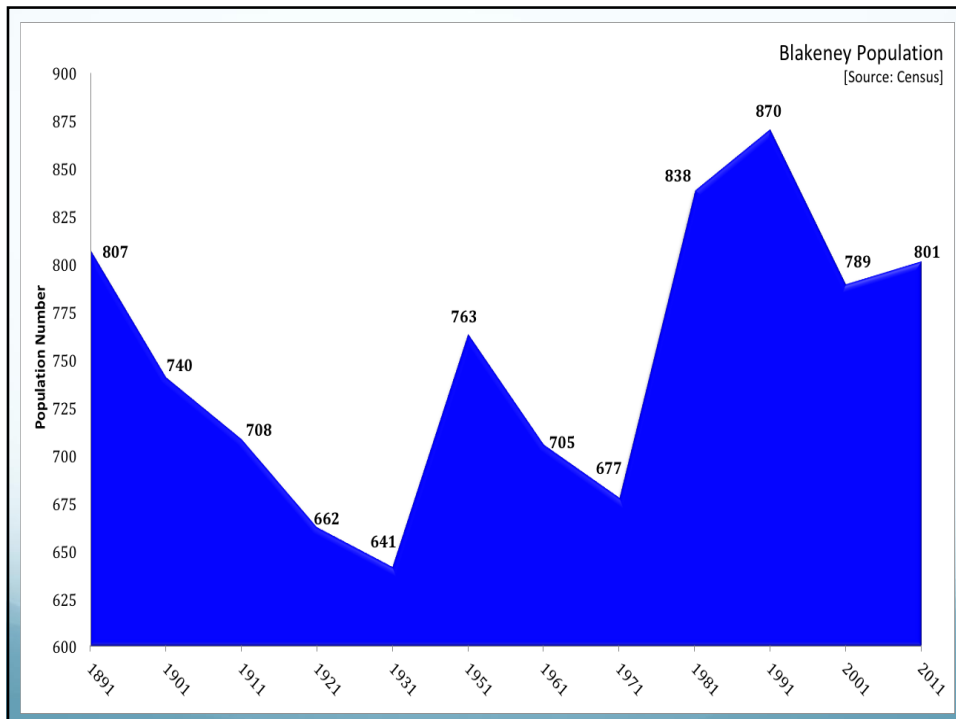
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Interesting Facts and Figures

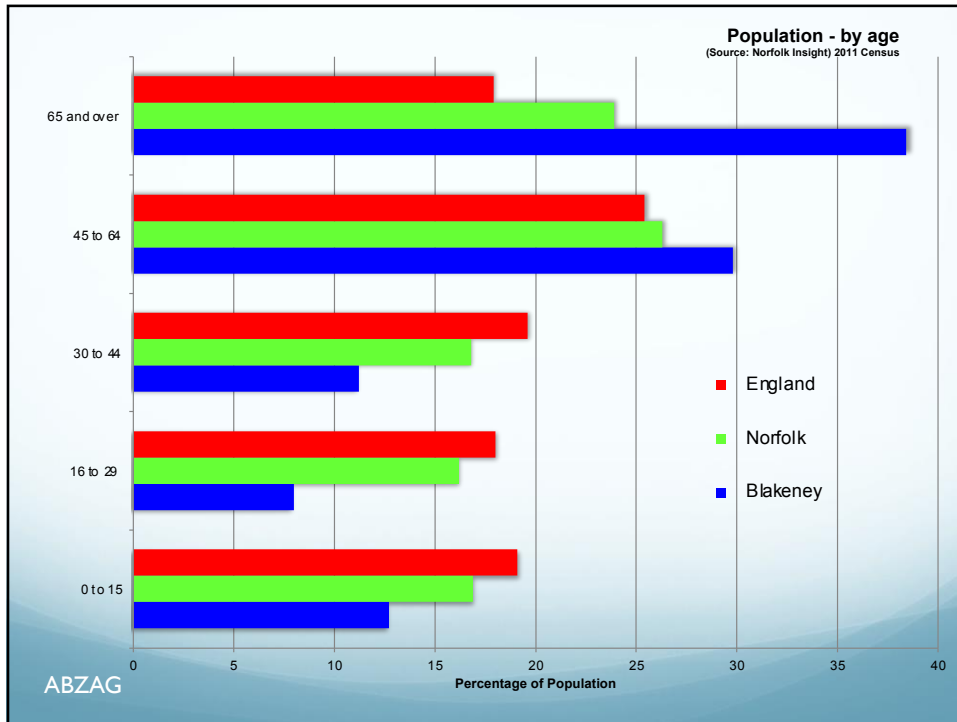
- Population
- Household Size and Tenure
- Health and Well-being
- Travel to Work

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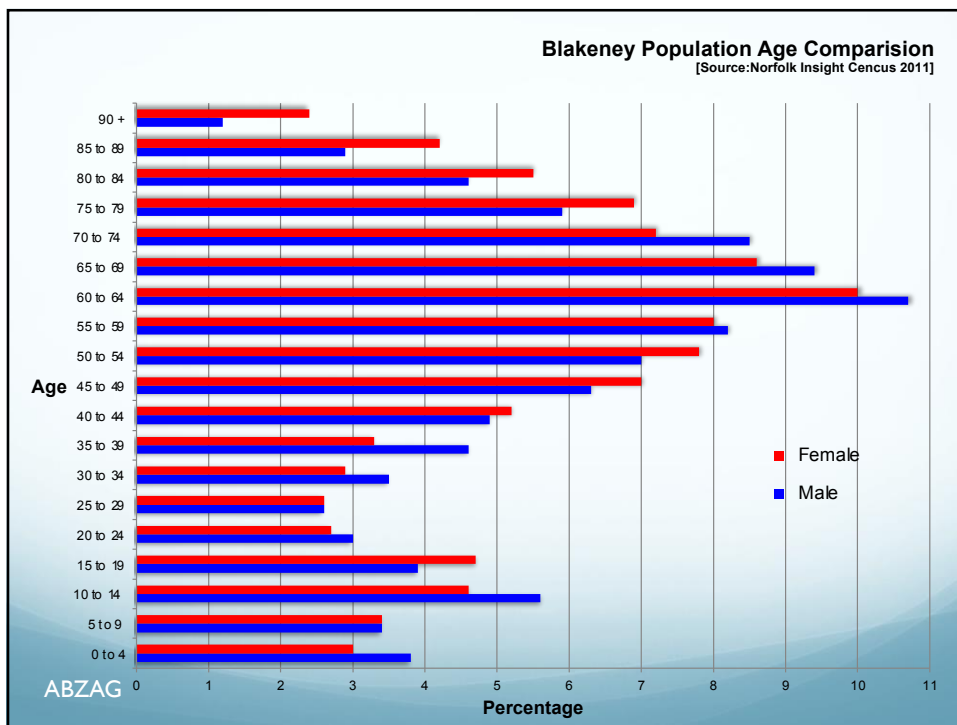
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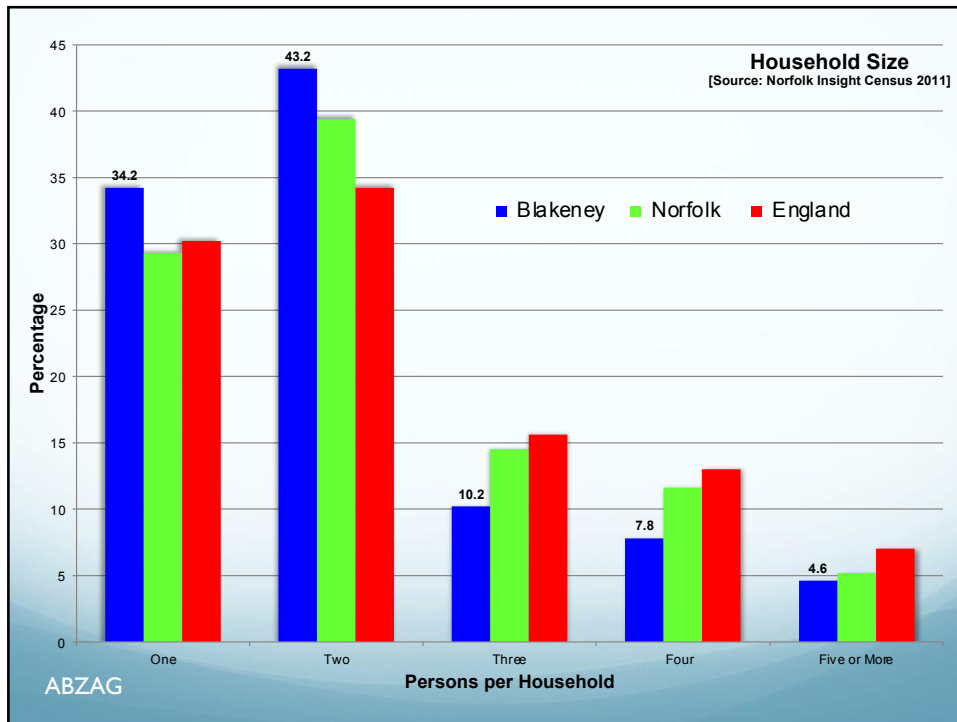
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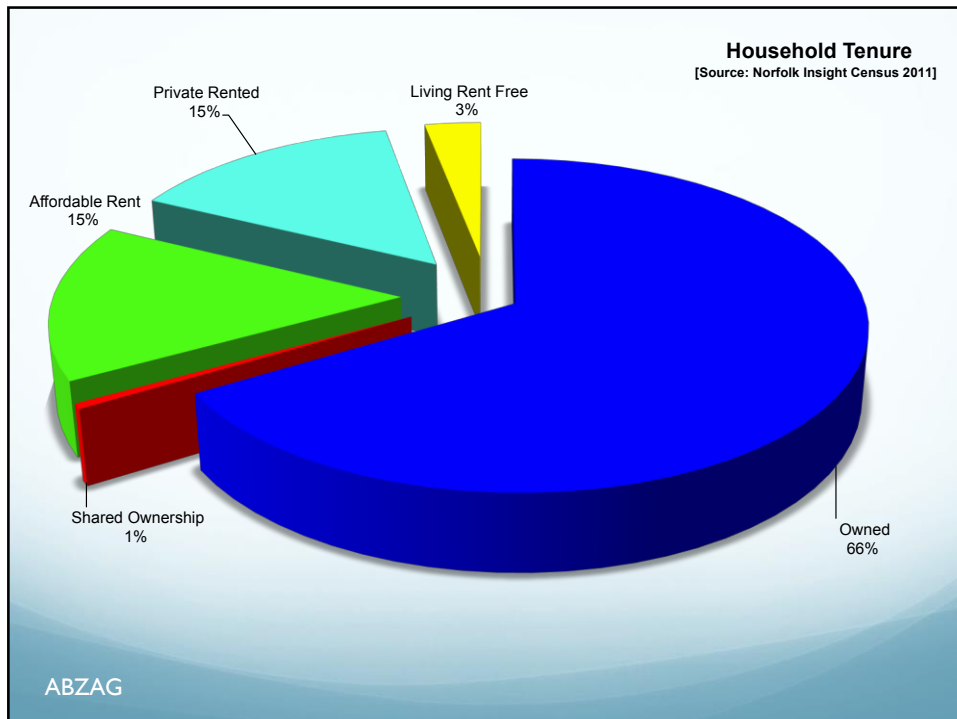
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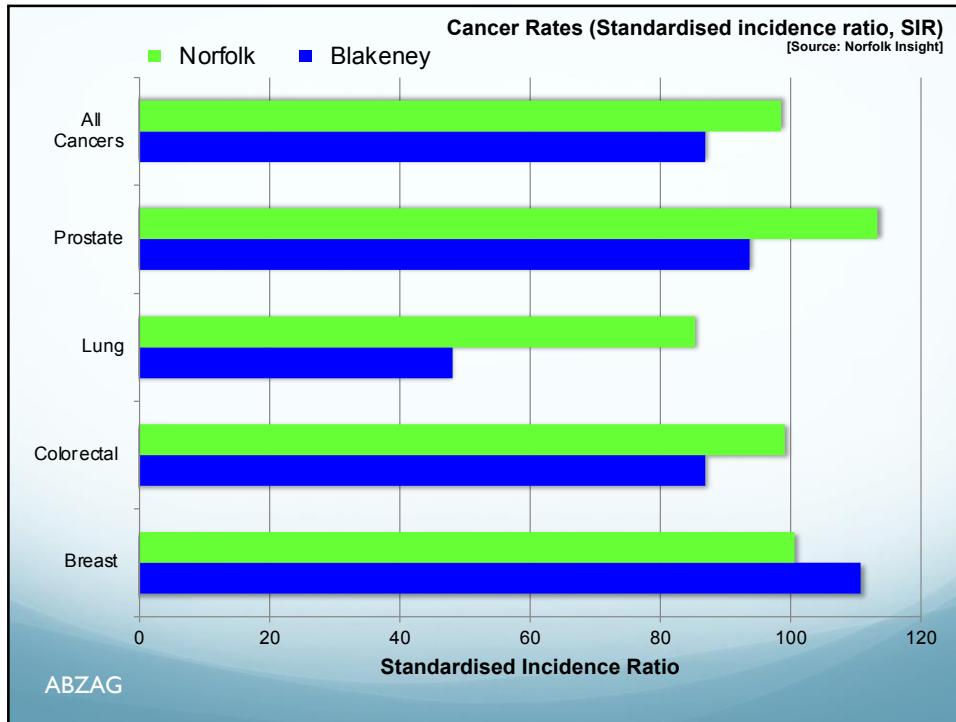
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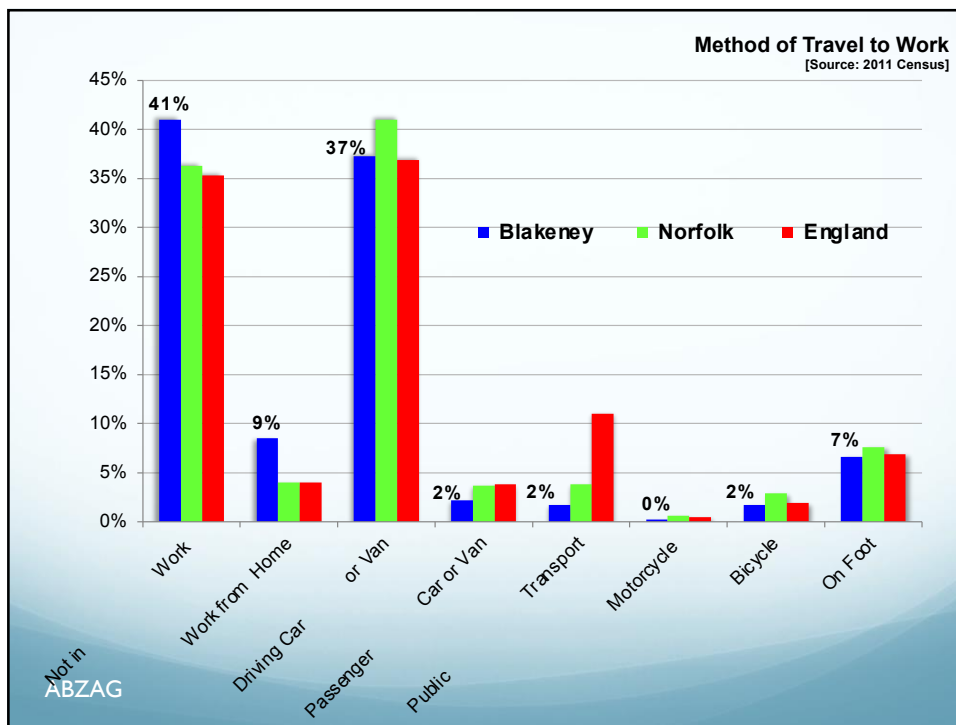
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17

Emerging Local Plan

- Replace existing Core Strategy and Site Allocations
- Define District wide growth to 2036 to meet housing need
- Allocation for Blakeney: likely to be 30 to 50 new homes
 - 32 Blakeney sites (290 homes) deemed 'unsuitable'
 - Site visits 5th April 2018
 - Appraise most suitable
- Draft document and preferred options (Regulation 18 consultation)

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North Norfolk Local Plan 2016 - 2036

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Local Plan

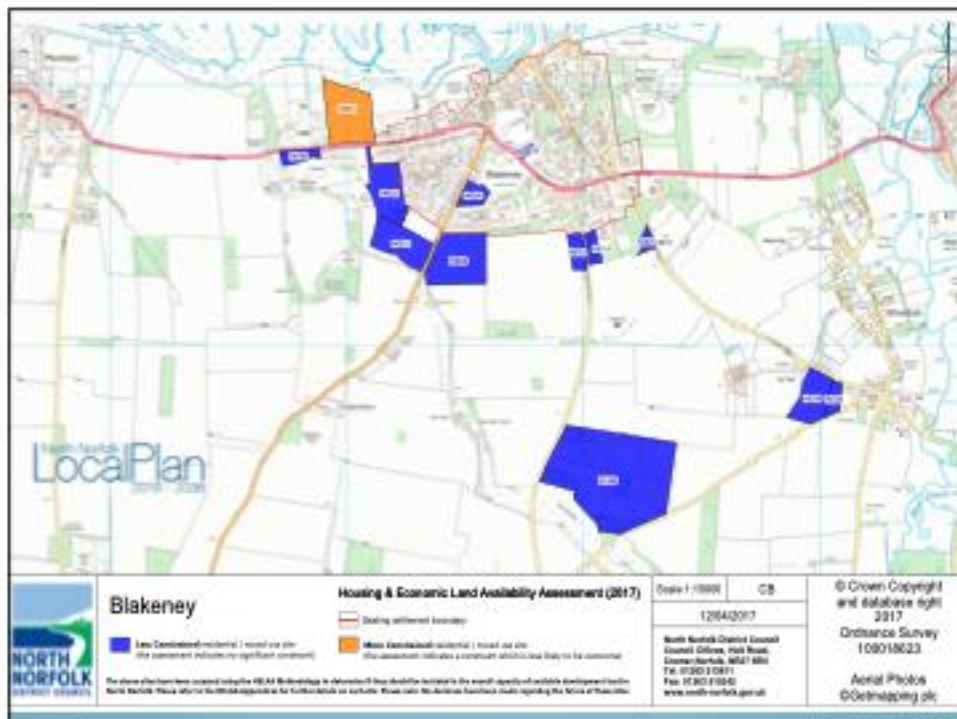
Sites with Planning Permission (as of August 2016)

HELAA Reference	Planning Reference	Site Name	Settlement	Site Area	Gross Capacity
H0458	PP/15/0070	Greencroft House, 22 Morston Road, Blakeney, Holt, NR25 7BE	Blakeney	1.65	8
H0539	PP/15/1847	Michaelmas Cottage, 1 Langham Road, Blakeney, Holt, NR25 7PG	Blakeney	0.26	2
H0373	PP/13/0706	The Old Rectory, 6 Wiveton Road, Blakeney, Holt, NR25 7NJ	Blakeney	0.26	0

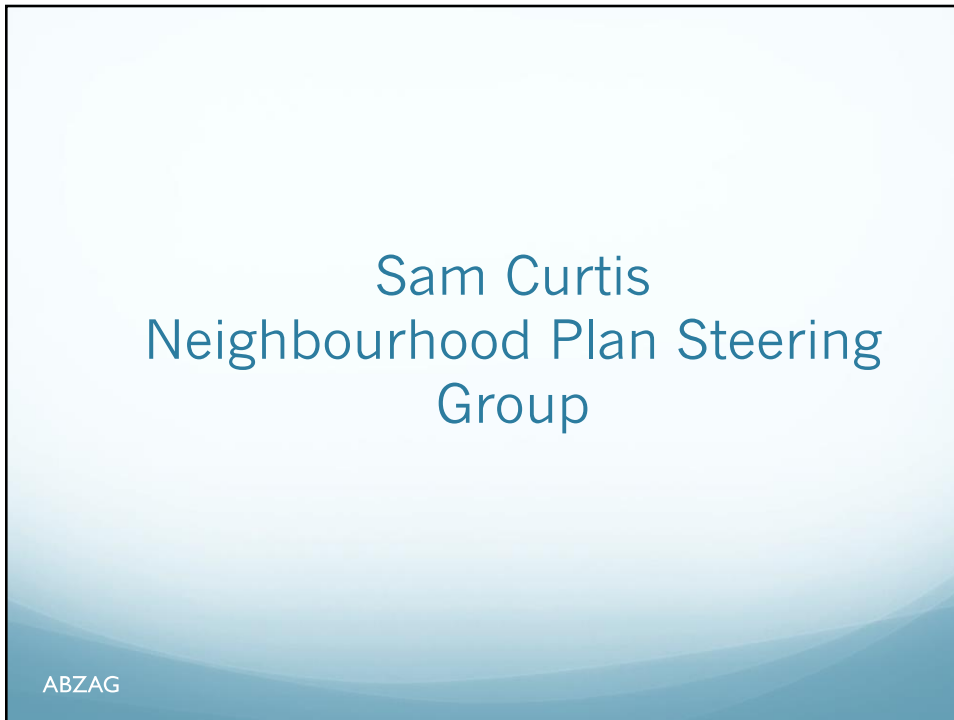
Potential sites identified: small & large (50+)

HELAA Reference	Site Name	Settlement	Settlement Hierarchy	Site Size	Gross Capacity
H0020	Land off Langham Road	Blakeney	Service Village	0.87	20
H1417	Land at Little Lane, Blakeney	Blakeney	Service Village	0.253	8
H2024	8 Wiveton Road	Blakeney	Service Village	0.422	17
H0018	Land South Of Morston Road	Blakeney	Service Village	2.9	87
H0019	Land East Of Langham Road	Blakeney	Service Village	4.4	132
H0022	Land West Of Langham Road	Blakeney	Service Village	2.0	57
H1366	Three Owls Farm, Saxingham Road	Blakeney	Service Village	15.0	477
Blakeney				10	844

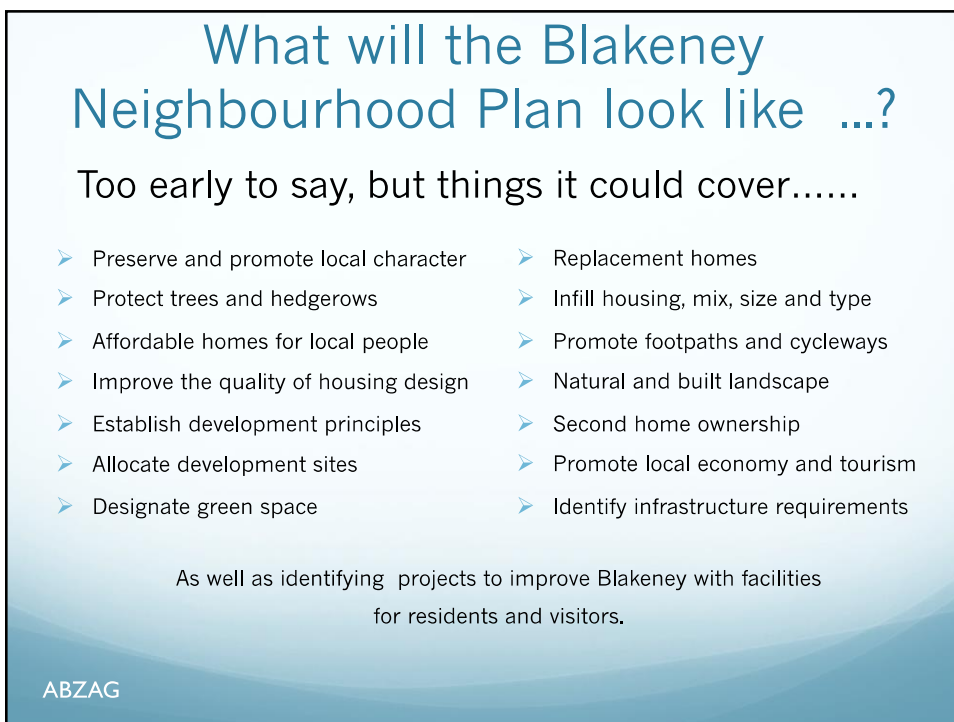
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Steering Group

Steering Group Members

- Jane Armstrong
 - Margaret Benson
 - Sam Curtis (Chair)
 - Alban Donohoe
 - Jenny Girling
 - Don Glaister
 - Helen Horabin
 - Robbie Strang
 - John Seymour
 - Rosemary Thew (Vice-Chair)
 - Iain Wolfe
- Steering Group has met twice and supported by Shaun Vincent.
 - Meetings are open to residents to attend and observe.
 - If you want to join the Steering Group please let me know.
 - Meetings are usually in the Wallace Room or Parish Council Office.
 - Check out the Neighbourhood Plan webpage on the Parish Council website for details.
www.blakeneyparishcouncil.co.uk

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So far, what has happened ?

- Two meetings
- Introduction to planning
- Working with North Norfolk District Council
- Starting to build the vision, aims and objectives



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Your help with Vision, Aims and Objectives

We would like your thoughts (good and bad) on suggested areas that the vision, aims and objectives could cover.

Please would you also let us have details of any additional areas you feel should be covered.

Vision (How our village will look in 15 to 20 years...)

Suggestions that could be covered in a Vision Statement ...

1. Blakeney will maintain its own identity and retain its village feel and sense of community.
2. New development will be considered holistically and integrated within the village to create a thriving community.
3. Blakeney will remain a safe place for our children to grow up and make their own homes.
4. The impact of development on the landscape and surrounding countryside will be minimised.
5. Blakeney will retain its rural village feel with a close connection to the coast and wildlife.
6. Thoughtful and careful development that ensures the infrastructure is reflective of the community's needs.
7. Good quality leisure and recreation facilities will be available for all age groups in the community.
8. New development that brings a variety of well-designed affordable homes to create a place people will want to live.

Aims (Things we would like to see happen)

Suggested areas the aims for the Neighbourhood Plan could cover ...

1. To promote positive change that will benefit the whole community.
2. An integrated approach to growth to maintain our village setting.
3. A strong community voice to shape future development and enhance our community spirit.
4. To safeguard local wildlife and protect their habitats to enhance our surroundings.
5. To reduce the impact of traffic on the village, improve road safety and reduce congestion.

Objectives (What needs to happen to deliver our Vision)

Key areas the objectives for the Neighbourhood Plan could cover ...

1. To improve infrastructure, community facilities and services to meet current and future requirements.
2. To improve the local economy and create jobs.
3. To improve the environment and create a sense of place.
4. To improve the safety and security of the village.
5. To improve the quality of life for residents.
6. To improve the accessibility of the village.
7. To improve the sustainability of the village.
8. To improve the resilience of the village.

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Neighbourhood Planning Process

1. Events and workshops to give local residents opportunity to share views and ideas
2. Develop a vision and planning policies
3. Draft Neighbourhood Plan and issue for consultation
4. Independent Examination
5. Referendum – local residents get to vote 'YES' or 'NO'
6. Neighbourhood Plan is 'made' (adopted) and becomes a legal requirement

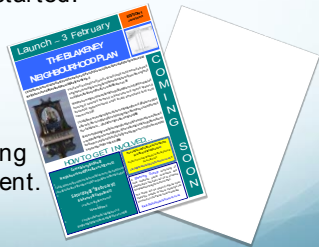
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So far, what has happened ?



- Parish Council decided to undertake a Neighbourhood Plan.
- Steering Group established, the hard work has started.
- Newsletter issued
- Successful grant funding from Central Government.




My Community locality

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Neighbourhood Area



The civil parish boundary of Blakeney has been designated as the Neighbourhood Area.

The planning policies in the Neighbourhood Plan will apply to this entire area.

Blakeney Neighbourhood Area
 1:25,000 CB
 25/1/2017
 © Crown Copyright and database right 2017
 Ordnance Survey 1000 18823
 Aerial Photos ©Getmapping plc

NORTH NORFOLK DISTRICT COUNCIL
 Map Key
 Boundary of Neighbourhood Area

NORTH NORFOLK DISTRICT COUNCIL
 Council Offices, 149 Strand,
 Great Yarmouth, Norfolk
 PO12 1JN
 Tel: 01493 31000
 Fax: 01493 31000
 www.norfolk.gov.uk

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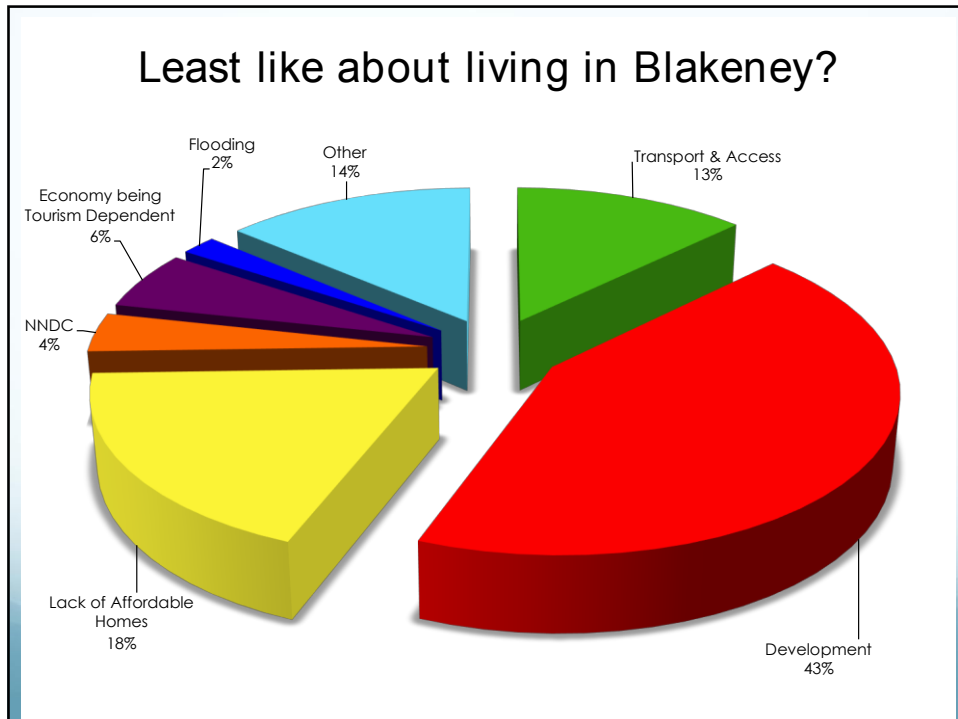
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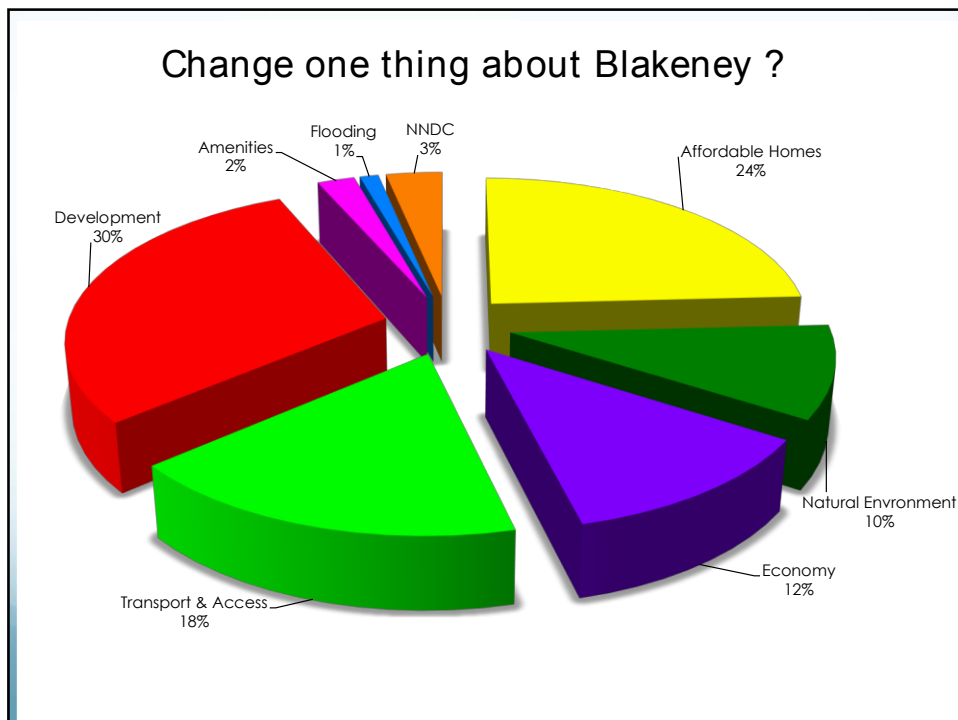
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It is all about our community and being heard



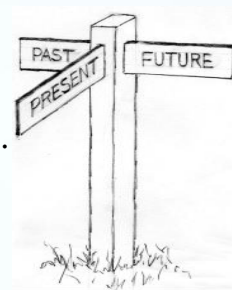
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Next Steps

In developing the Neighbourhood Plan ...

- Listen to what you have said
- Steering Group meetings
- Vision, aims and objectives
- Next consultation event
- Get involved
- Have your say.






Pointing Blakeney Towards the Future

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Appendix 6

Stakeholder Letter and Key Consultee List

-  Introduction of Blakeney Neighbourhood Plan
-  Notification of Pre-submission Consultation (via email)
-  Key Consultee List



BLAKENEY PARISH COUNCIL

The Parish Office, Langham Road, Blakeney, Holt, Norfolk, NR25 7PG

Tel: 01263 741106

Email: derk@blakeneyparishcouncil.org.uk

Clerk to the Council – Mrs Tracey Bayfield (Cert H.E. Local Policy)

9th July 2018

Sent by Email

Dear Stakeholder

The Blakeney Neighbourhood Plan

We are writing to let you know we have started to develop a Neighbourhood Plan for Blakeney. Hopefully you will have already seen details on our website and in The Glaven Valley Newsletter about our intent to produce a Neighbourhood Development Plan.

To give you a flavour of what is happening:

- Members of the local community have responded well to the idea of a neighbourhood plan and a Steering Group has been formed to oversee development of The Blakeney Neighbourhood Plan.
- North Norfolk District Council has designated the Neighbourhood Area, this follows the parish boundary of Blakeney.
- We are holding public open sessions and events where participation, views and ideas will help to enhance our village for the whole community.

Your views on future development in Blakeney are important and welcome.

The next event is on **28th July at Blakeney Village Hall on Langham Road, NR25 7PG**. We hope you will join us just come along at a time to suit you between **10am and 2pm**. Members of the Steering Group will be on hand and we look forward to hearing your thoughts.

If you are unable to join us and have any comments, questions or would like to know more please respond directly to me at the above address.

Yours sincerely,

Mrs Tracey Bayfield
Clerk to Blakeney Parish Council



BLAKENEY PARISH COUNCIL

The Parish Office, Langham Road, Blakeney, Hdt, Norfolk, NR25 7PG
Tel: 01263 741106 Email: clerk@blakeneyparishcouncil.org.uk

Clerk to the Council – Mrs Tracey Bayfield (Cert H.E. Local Policy)

3rd October 2019

Sent by Email

Dear Stakeholder

Neighbourhood Plan for Blakeney

We are writing to notify you of the six-week consultation on the 'Pre-submission' draft Blakeney Neighbourhood Plan. This begins today and closes on Friday 15th November 2019.

The draft Neighbourhood Plan and the consultation response form are available to download from our website at: <http://www.blakeneyparishcouncil.org.uk>

We would also like to take this opportunity to invite you to 'drop-in' and join us at our community events to see and comment on the draft Neighbourhood Plan and ask any questions you may have. These take place on Tuesday 22nd October between 2pm and 6pm and Wednesday 23rd October between 9:30am and 12:30pm at Blakeney Village Hall, Langham Road, Blakeney, NR25 7PG. Members of the Steering Group will be on hand and we will look forward to hearing your thoughts.

Your views on future development in Blakeney are important and welcomed. We would appreciate your comments on the draft Neighbourhood Plan to help enhance our village for the whole community.

We hope to see you at one of the community events and look forward to receiving your comments on the draft Neighbourhood Plan. If you are unable to join us please return your completed response form by email to clerk@blakeneyparishcouncil.org.uk or post to the above address no later than 15th November 2019.

Yours sincerely,

Mrs Tracey Bayfield
Clerk to Blakeney Parish Council

Key Stakeholder List

-  Anglian Water Services Ltd
-  British Telecommunications plc.
-  Blakeney Neighbourhood Housing Society
-  Broadland Housing Association
-  Clarion Housing Association
-  Cley-next-the-Sea Parish Council
-  CPRE Norfolk
-  EDF Energy
-  Environment Agency (Eastern Region)
-  Gladstone Builders
-  Highways Agency
-  Historic England
-  Homes & Communities Agency
-  Hopkins Homes
-  Hutchison 3G UK Limited
-  Karen Ward North Norfolk District Councillor
-  Langham Parish Council
-  Letheringsett with Glandford Parish Council
-  Lovell Homes
-  Marie Strong Norfolk County Councillor
-  Mobile Operators Association
-  National Grid Gas Distribution
-  National Grid DPM Consultants
-  National Power
-  National Trust
-  Natural England
-  Network Rail
-  Norfolk Biodiversity Partnership
-  Norfolk Constabulary - Estates Dept
-  Norfolk County Council

-  Norfolk Geodiversity Partnership
-  Norfolk Landscape Archaeology
-  Norfolk Homes Ltd
-  Norman Lamb, MP (now Duncan Baker MP)
-  North Norfolk Clinical Commissioning Group
-  North Norfolk District Council
-  North Norfolk Housing Trust
-  Norfolk Police Authority
-  Norfolk Rivers Internal Drainage Board
-  Norfolk Wildlife Trust
-  O2 (UK) Limited
-  Orbit Housing Association
-  Parish Councils
-  Persimmon Homes
-  Saffron Housing Trust
-  Savills
-  Three Mobile Communications
-  Wherry Housing Association Ltd
-  Victory Housing Trust
-  Vodafone Limited

Appendix 7

Village Questionnaire

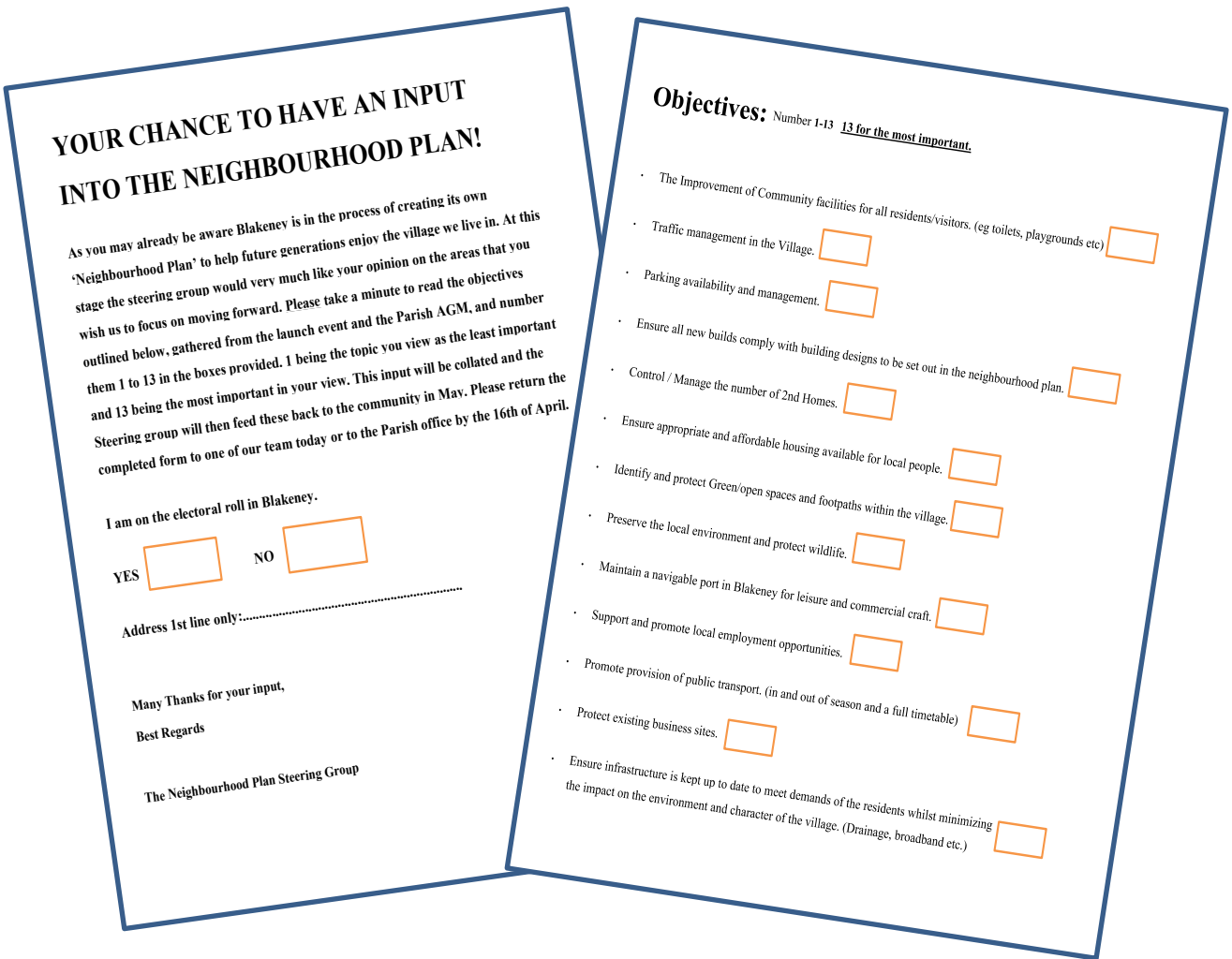
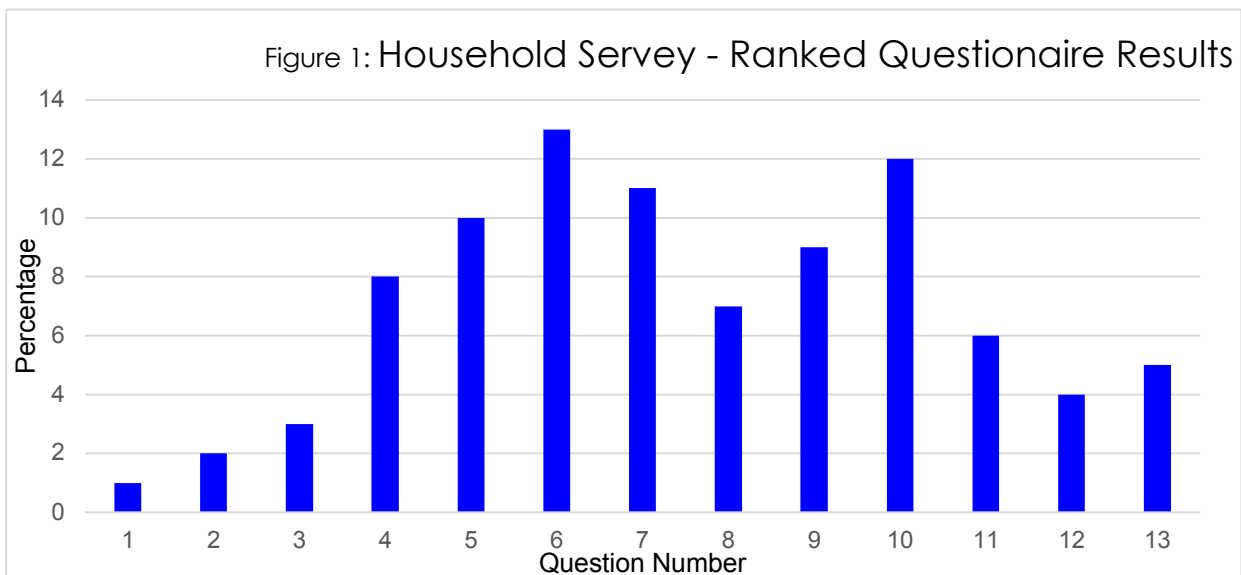


Figure 1: Household Survey - Ranked Questionnaire Results



Appendix 8

Workshops with North Norfolk District Council

**Blakeney Neighbourhood Plan
Pre-Submission Version March 2019 (v0.08)**

Comments from NNDC – 25th March 2019. Presented to Steering Group Meeting.

NNDC Officer General Comments

Thank you for sharing the emerging Blakeney Neighbourhood Plan and seeking NNDC officer's informal advice. The policies have been shared with colleagues within the council and the comments reflect this broad view. The comments are intended to be challenging and constructive and where we can we have ended by suggesting an alternative approach or wording.

Our aim, like yours is to ensure that the BNP becomes an effective part of the overall development plan. In achieving that, the policy approaches not only need to be clear, evidenced and justified but the cumulative affects need to be articulated.

There are opportunities to build in local distinctiveness into the BNP that are included, but at present, require further development to make the policies truly effective.

As a way forward we would suggest a series of specific workshops to explore the approaches and evidence to inform specific themes / options ahead of any public consultation to ensure the NP is robust and brings any localised benefits and explains the relationships and effectiveness of the intended approaches to the community.

Most comments reflect similar advice highlighting similar areas of concern, that of:

- The BNP as produced so far falls into the trap of repeating existing policies in the NNDC development plan and brings no added value and little local distinctiveness to the decision making process or explain to the reader the intended consequences and effectiveness of the approach being suggested.
- By not bringing forward any additional growth (in addition to the emerging Local Plan) the effectiveness on the policies in delivering any principle residences or affordable housing is significantly questioned, and will only bring about minimal gains. Given this it is hard to justify the approach.
- The scope of the plan in influencing planning decisions in minimal
- Repetition and duplication of local and national policy, along with repetition within the NP causing inconsistencies in approach and confusion
- What justification is used / evidence underpinning the policy – it is not sufficient to just rely on a community expectation, that expectation needs to be underpinned by a review of existing policy approaches / and what evidence is there to lead you to develop a policy that is in conformity with it. Please see the conformity guidance on the NNDC web site.
- Inconsistencies in references to the Local Plan, core strategy and Development Plan – it is not clear which document and how this np is intended to be in general conformity with the strategic policies
- Question specific wording in the policies which are ambiguous in places and need to be specific and clear in their interpretation.
- Overall it does not explain to the reader the relationship the np has to the wider development Plan, how it will be used or why the approaches suggested are relevant, justified and what other approaches could be used.

As it stands the emerging plan and approach to supporting evidence would benefit from professional planning input. There are too many open-ended issues and shortfalls in supporting evidence within this plan which set out a misleading approach to the community and the effects of the approach seem ill thought through and collectively would impact negatively on improving the issues identified.

The community needs to be able to understand why the suggested policy is the best approach to achieve the aim and that cumulatively they do not conflict and stifle development. This will improve the quality of feedback from any consultation and reduce the potential for challenge and litigation.

Generally speaking, neighbourhood plans should be locally specific rather than seek to include general policies that cover the spectrum of basic land use planning. i.e. producing a neighbourhood plan gives the community the opportunity to bring to the attention of the determining officer and proposer additional policies that should be considered at the time of determination / application. The policies need to complement and provide local clarity/ distinction to the existing national and NNDC policies. The BNP should provide additional new policies that seek to direct on local issues. The BNP should not seek to repeat areas covered by the Core Strategy or emerging Local Plan instead they need to add a finer layer to the approach that is necessary to inform planning proposals in the neighbourhood plan area, NPA. Such policies should only be included if there is sufficient evidence to justify a policy intervention and the policy can be delivered and can be effective. i.e. go some way as to achieve its purpose and make a difference. Policies and or parts of policies that are already covered in higher order plans, (national policy, NPPF, and other development plan documents) will be removed at examination resulting in the real prospect of the PC having misled the community in the production of the NP. Policies i.e. the BNP should not repeat, duplicate or include general policies that are not for the sake of generalisations not seeking to cover every planning issue regardless of existing policies and evidence.

In places we are concerned that some of the policies are not required as the policy area is already covered in the wider Developer Plan and seem to be included without any local evidence or real reason. These do not add anything to the development plan and worse will add confusion. Others include misleading and inaccurate interpretation of planning law. We have advised that although it is important to obtain community buy in, community support is not sufficient justification to include a policy. It remains the case that each approach needs to be evidenced, justified and explained to the reader why it is needed and how it is to be interpreted. We cannot stress enough how important it is to justify every policy approach with a review of all of the necessary evidence and at this stage present it to the community next to the policy

Evidence

Planning practice guidance states that:

“Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan” National Planning Practice Guidance Paragraph 040 Reference ID: 41-040-20160211

Accepting that there the emerging plan includes some evidence towards the back of the plan it is considered that so far this is incomplete and does not go far enough in its review of indicators, potential policy options and remains inconclusive. As such many of the important considerations and implications have been left out which leaves the emerging plan at risk from considerable challenge. We would recommend a full suite of background evidence papers which should accompany any pre submission consultation. The papers

should review the available evidence in full, if there are gaps then that evidence must be either commissioned or undertaken first hand, the papers should include analysis of the issues and those that the approaches could raise. i.e the implications such as impacts on viability and delivery of growth. The analysis must include a review of the findings, review the potential options for policy intervention and conclude on the appropriate policy. The approach taken must be proportionate to the findings. The papers should include a review of the existing national approach, and district approach in relation to each issue you are trying to address.

In relation to the approach for Principle Residencies, now that we know this is a topic area that PC is seeking to address we can provide you a detailed evidence note in due course on how to collate evidence, review the issues and seek justification for such an approach.

It is understandable that policy approaches taken in other NPs will be seen as attractive, where it is felt similar issues occur. There is some concern that some parts of the plan may have been taken, verbatim, from the North Northumberland Coast NP and the BNP *must* to be informed by appropriate and proportionate evidence that is locally derived and comprehensive enough to:

- a) outline the policy options available to it;
- b) justify the chosen approach, and;
- c) provide sufficient information to the community so that they can use the evidence to inform their opinion.

The text in the BNP especially at this early consultation stage needs to be more transparent and explain the purpose of the policy approaches suggested, what other options were considered and how the policies will impact on the community (individually and cumulatively). This justification process will help the PC, the BNP steering group communicate to the community so they can gauge the usefulness of the proposed policy approach and assist them in their engagement with the plan or consultation response. Currently, the policies that have been put forward do not explain or communicate the implications or consequences and how they have been informed by the appropriate evidence.

Further work needs to be done on the evidence and justification to support the policies in the plan. The BNP steering group should produce a complete evidence base that can be presented to the community, the council, and ultimately, to the inspector. This evidence base should be a suite of relevant background papers that consider all the issues and options in their entirety and conclude why the policy approach put forward in the BNP is the most appropriate. The evidence base should be separate from BNP but accompany the consultation.

At the end of the process NNDC has to be able to conclude, from the evidence base of the BNP, that the policy is a necessary and proportionate response to a particular local issue of some significance to those living in the area of the NP.

Existing Core Strategy / emerging Local Plan.

The BNP uses interchangeable references to the 'Core Strategy' and 'Local Plan' as well as 'Development Plan'. It should be detailed from the outset which plan the BNP is seeking to align to. As previously advised the starting point should be an assessment of the existing policies in the whole Local Plan (LDF: Design Guide, Core Strategy, Site Allocations

Plan, LCA) to ensure the BNP is not repeating or seeking to duplicate existing policy approach's and or conflict with the strategic elements of the whole plan. For clarity, it might be worthwhile consistently referring to the existing Local Plan as the 'existing Core Strategy' and the new Local Plan as the 'emerging Local Plan' (and explain/clarify this at the outset).

The BNP should set out where the BNP sits within the overall Development Plan (again at the beginning of the document). It should emphasise that it is not a stand-alone document that will deliver on all of the planning and land use issues of Blakeney, rather, that it will form part of the North Norfolk Development Plan and will help inform the decision maker in the determination of applications in the BNP area.

We are currently in the process of replacing the existing Core Strategy and will be consulting on the new Draft Local Plan in May 2019. We will provide you with an advanced draft version of the Local Plan to aid in the production of the BNP. However, in the majority of cases the last plan to be made is taken as the most up to date plan – i.e. the existing Core Strategy. For the longevity of the BNP it is highly recommended that the plan is amended to reflect and build on the emerging Local Plan by adding the local distinctiveness, local detail to the emerging Local Plan policies whilst still respecting/conforming to the Core Strategy strategic policies. If there is conflict between the CS and emerging LP agreement should be sought by on the council's position so that the BNP approach can remain up to date and be supported by NNDC at examination.

Therefore, we suggest you make sure the BNP **conforms with the existing Core Strategy** – but also **has regard to the emerging Local Plan**.

Conflict/Duplication/Repetition

A number of policies and or some parts of policies, as currently written, do conflict with existing policy (NPPF and CS) and other policies are unnecessary and/or confusing duplications.

There are also potential conflicts between individual policies within the BNP itself which could cause confusion and, as such, could be incorrectly applied at determination stage. Policies should be positively worded, clear, unambiguous, not conflict with each other and, in order to be effective, they should have 'operative' clauses.

Conditions

Para 55 of the NPPF outlines the position on conditions in policies. It states that planning conditions should be kept to the minimum and only imposed when they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. The six tests required are detailed in the PPG see para 003 ref ID:21a-003-20140306

In writing the policies, consideration should be given to these tests and if they policies do not meet the tests then NNDC will not be able to condition/enforce the use of the policies and your specific policy will be ineffective.

Consultation and Engagement

Its noted that the consultation reply form is seeking to identify is respondents are on the electoral register or not. Please note that the regulation and guidance specifically puts the onus on the Parish Council **to engage effectively**.

We would be concerned if a response duly made is not taken into account. The regulations are quoted below for your guidance and **we would expect that every effort is made to be inclusive of those that conduct business in the NPA as well as those on the electoral register**. This includes the owners of holiday cottages and those that use their dwellings as second homes, business owners, landowners, agents and all

that may have a legal interest in Blakeney. In consulting the community, the PC will need to be satisfied that the specified consultees are being consulted (we can give you the details) and also all the wider community are given the opportunity to respond. Specific research into those organisations and business that operate in the community, including absentee landlords and second home owners and detail how they can be contacted. NNDC will require a copy of the list at submission so that it can then inform those previously consulted on the next steps (this is in the regulations).

Neighbourhood Plan regulations:

*A qualifying body should be inclusive and open in the preparation of its neighbourhood plan or Order and **ensure that the wider community:***

- *is kept fully informed of what is being proposed*
- ***is able to make their views known throughout the process***
- *has opportunities to be actively involved in shaping the emerging neighbourhood plan or Order*
- *is made aware of how their views have informed the draft neighbourhood plan or Order.*

Paragraph: 047 Reference ID: 41-047-20140306

Revision date: 06 03 2014

The General NP Regs require the pre-submission proposal to be widely publicised, with details of how to make representations, and the qualifying body (The Parish Council - NNDC insertion) to consult with any of the specified consultation bodies (schedule 1) whose interests may be affected by the proposals.

The PC is well advised not to discount any view that is properly submitted to them in this process and will need to show how they have been taken into account, this includes NNDC and other statutory body comments.

These general points will be picked up, in detail, in relation to the individual policies – below.

NPSG Comments and Suggested Ways Forward From Workshop

- Plan Period - as BNHP unlikely to be adopted in 2019 move start date to 2020 and make the plan period 2020 to 2040.
- Layout – while there is no set layout and the initial draft BHNP has all policies listed then followed by justification and text, on reflection, it is felt having the policy ambition, justification and text prior to the policy would make it easier reading and aid understanding.
- Evidence – should be proportionate. Large amounts of appropriate and proportionate evidence is already in the in the BNHP or Baseline Date document and is specific to Blakeney with comparisons. The requirements for a neighbourhood plan are different to that of a Local Plan and NNDC should recognise this.
- Site Allocations - it is not a requirement of a neighbourhood plan to allocate sites although it could. Many are only policies.
- Impact – it is appreciated that the BNHP could be seen to have limited impact due to the small scale of planned growth in the neighbourhood area and the size of the village. Although each policy does seek to make a significant difference to development in the village and address key issues such as access to affordable homes and second home ownership.

THEME 1: BUILT ENVIRONMENT

POLICY 1: Affordable Homes for Local People							
Issue/Comments							
	Conformity			Repetition	Duplication	Legal	Evidence
	NPPF	Core Strategy	Emerging Local Plan?				
✓ = conforms ✗ = does not conform		✗	✗			✗	✗
Comments	<p>The policy, potentially, conflicts with the Core Strategy and the emerging Local Plan.</p> <p>The application of this policy could only apply to allocations/developments beyond the strategic allocation – i.e. allocations made by the BNP and/or windfall development. This is because the strategic allocations, in the emerging Local Plan, are there to address a strategic, district wide need, that has to be addressed through the allocations of sites in the selected settlements. Furthermore, the existing Core Strategy does not require affordable homes under 10 dwellings and the emerging Local Plan will not require affordable homes under 5 dwellings.</p> <p>How effective is this policy going to be – if it does not apply to strategic allocation(s) and will not apply to developments under 10/5 dwellings?</p> <p>The identified strategic approach requires allocated sites to be available to applicants from the housing register, regardless of their connection to Blakeney. The Core Strategy and the emerging Local Plan reflect the legal requirement that North Norfolk District Council gives reasonable preference to households in housing need. These households include:</p> <ul style="list-style-type: none"> • Homeless households. • Households occupying insanitary or otherwise unsatisfactory housing. • Households lacking one or more bedrooms (overcrowded). • Households who need to move on medical grounds. <p>It is not clear on what basis the 33% is justified. The summary of evidence contained in the back of the plan states that there are 79 households on the NNDC waiting list that have a local connection to Blakeney. This includes an unidentified number of people from outside the NPA and includes the parish of Cley, Field Dalling, Langham and Morston. The NPA should only be seeking to address its own need. In addition, the waiting list held by the council represents the demand for housing not need. Many of those on the list may already be housed. The BNP steering Group should undertake its own housing needs survey and primary evidence to supports the NP policies.</p> <p><u>Effectiveness of policy</u></p> <p>What is meant by any new development? As written it includes extensions, granny annex, business use, tourist accommodation as well as the strategic allocations (where it will not apply). The BNP needs to be</p>						

	<p>specific and clarify, in the supporting text, and policy wording how and when the policy would apply. In the analysis of its effectiveness you need to conclude how the approach is seen to address the issue of delivering more local housing and specifically where support will be given if the policy is to be applied in any useful way.</p> <p>The plan should be explicit in advising the public on the effectiveness of the policy and what it will deliver to address the (yet to be defined) need. Has a review been undertaken on the potential effectiveness of this policy? i.e. there needs to be an appreciation/explanation of how many affordable homes will actually be provided through implementation of the policy.</p> <p>The local connection criteria need further clarity and explanation. e.g. what is meant by former resident of the parish? How long does someone have to live there? Why should a former resident who currently lives in London get priority over someone who has a connection but lives elsewhere in North Norfolk? The evidence, reason and justification should explain why the BNP came up with this criteria.</p>
<p>Remedy</p>	<p>Locally derived evidence is required to fully inform the policy approach.</p> <p>The BNP should undertake its own primary evidence to supports the policies of the BNP and undertake a full parish local housing needs assessment. The assessment should survey households and categorise into future demand age cohorts.</p> <p>The policy aims to provide more homes to meet local housing need but at the expense of households from elsewhere in the district who may have more urgent housing need.</p> <p>The policy would be applicable, and bring benefits, if the BNP sought to allocate its own additional sites to address the need and in doing so the BNP would not only have the ability to address need, but also be apply a locally derived allocation policy similar to the one currently available to exception sites.</p> <p>The Council remains supportive of community led development and has been working with the PC for some time to deliver affordable housing site sin the parish, to date these have not come forward. Not allocating sites is a missed opportunity to address local need and it is recommended that the BNP take this opportunity to develop effective policies. The emerging Local Plan is supportive of affordable housing on Exceptions Housing Sites and includes further policies supportive of community led growth. The policy base allows for and promotes 100% affordable housing for local people. The PC can effectively build on this policy and identify land that would not normally be supported for growth for the benefit of the community such an approach would directly benefit the local community</p> <p><u>Solution</u></p> <p>The Neighbourhood should be allocating additional sites – which would provide more affordable homes and ensure that the provision of affordable homes for local people is not at the expense of those households with more urgent housing need. it would be possible outside the strategic sites to allocate additional growth sites based on identified local need.</p> <p><u>Possible Policy approach:</u></p>

	<p>The default position in relation to the strategic allocated site in Blakeney should be explained and it should be made clear (in the reasons/justification before the policy) that such a policy (if it remains) could only apply to growth outside of strategic allocations.</p> <p>Outside the strategic allocations a proportion of all affordable development of xxx will be required to have a local connection*. NNDC planning policy requirements on the level of affordable housing currently at 45 % as detailed in the Core Strategy on developments of 10 or more dwellings (<i>subject to viability but due to change in line with new evidence to 35% on developments of 5 or more dwellings</i>).</p> <p>*NB the criteria will have to be agreed with NNDC as the local connection as currently presented is considered to fail equality regulations.</p>
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NPSG Comments and Suggested Ways Forward From Workshop

- The application of Policy 1, as with all the BNHP policies, would be on all new developments in the Neighbourhood Area once the BNHP is adopted.
- The Core Strategy is silent on affordable homes for local people, therefore, Policy 1 can not possibly be in conflict when the policy is not covered in the Core Strategy or the emerging Local Plan.
- The Housing Officer from NNDC, said this policy was okay, understood how this policy would work with the NNDC Housing Allocation Policy and could be applied. He recognised that the number of affordable homes that the allocated site would deliver was very small when compared to the District requirement and agreed the percentage for local people could be increased to 100%.
- The criteria for local connection to Blakeney is clear and easy to understand. It has no time requirements
- This policy is the same as many policies in lots of other adopted Neighbourhood Plans and will make affordable homes available to local people of Blakeney.

POLICY 2: Managing Second Home Ownership							
Issue/Comments							
	Conformity			Repetition	Duplication	Legal	Evidence
	NPPF	Core Strategy	Emerging Local Plan?				
✓ = conforms ✗ = does not conform		✗	✗			✗	✗
Comments	<p>The policy, potentially, conflicts with the Core Strategy and the emerging Local Plan.</p> <p>The application of this policy could only apply to allocations/developments beyond the strategic allocation – i.e. allocations made by the BNP and/or windfall development. This is because the strategic allocations, in the emerging Local Plan, are there to address a strategic, district wide need, that has to be</p>						

	<p>addressed through the allocations of sites in the selected settlements. Furthermore, the existing Core Strategy does not require affordable homes under 10 dwellings and the emerging Local Plan will not require affordable homes under 5 dwellings.</p> <p>The policy implies a level of control that cannot be imposed and as such is misleading to the public. The application of the proposed policy is likely to be considerably more limited than is probably currently anticipated, if it is able to be implemented and apply at all.</p> <p>How effective is this policy going to be – if it does not apply to strategic allocation(s) and will not apply to developments under 10/5 dwellings?</p> <p>As stated above, it is understandable that policy approaches taken in other NPs will be seen as attractive, where it is felt similar issues occur. This is one such policy that appears to have been copied, verbatim, from the North Northumberland Coast NP. The BNP <i>must</i> to be informed by appropriate and proportionate evidence that is <u>locally derived</u> in relation to second home ownership and justified on the specific local circumstances.</p> <p><u>Effectiveness of the policy</u></p> <p>Has the BNP considered what effect will such an approach have on the value of homes new and resale? Can this effect be substantiated with evidence? Evidence from St Ives suggests that the effects of such an approach is to potentially divert second home ownership to the existing housing stock - ironically increasing prices on the smaller more required homes.</p> <p><u>Viability</u></p> <p>Has the BNP considered how the policy would tie in with LP viability requirements? i.e. has an assessment been made how the approach will affect the margins of viability and whether it would impact on the overall strategic policy that sets the affordable housing requirements (taking into account the range of other infrastructure requirements)?</p> <p><u>Policy wording</u></p> <p>Similar to Policy 1 - it will not apply to the strategic allocations and the policy / pre amble text needs to state that up front</p>
<p>Remedy</p>	<p>Locally derived evidence is required to fully inform the policy approach.</p> <p>A full review of evidence is required to review the issues and potential options. Such analysis needs to include the local distinctive circumstances but also need to be wider to review potential options open to the group. An assessment needs to conclude if the high rates of second home / holiday homes are detrimental to the settlement across all indicators and if so what are the policy choses and solutions</p> <p>We can provide you a detailed evidence note in due course on how to collate evidence, review the issues and seek justification for such an approach. To date those NPs that have sought to introduce policies similar to those now being proposed by BNP have benefited from a further technical grant from locality grant which has enabled the specific and professional support through a large and influential planning consultancy AECOM. We would support such an application to ensure that the approach is properly justified. Please see condition advice contained above.</p>

NPSG Comments and Suggested Ways Forward From Workshop

- NNDC confirm that either the adopted Core Strategy or the emerging Local Plan has a policy in relation to second home ownership, therefore, there is no conflict as both these documents are silent and the BNHP does conform.
- NNDC to provide the latest information on ownership levels.
- Proceed with policy while being mindful to ongoing challenges and outcomes seen in St.Ives who have a very similar policy in their Neighbourhood Plan.

POLICY 3: Change of use from Residential to Holiday Accommodation

Issue/Comments							
	Conformity			Repetition	Duplication	Legal	Evidence
	NPPF	Core Strategy	Emerging Local Plan?				
√ = conforms ✗ = does not conform	✗	✗	✗		✗	✗	✗
Comments	<p>The policy implies a level of control that cannot be imposed and as such is misleading to the public. The application of proposed Policy 3 is likely to be considerably more limited than is probably currently anticipated, if it is able to be implemented and apply at all.</p> <p>This is another policy that appears to have been copied from the North Northumberland Coast NP. The BNP <i>must</i> to be informed by appropriate and proportionate evidence that is <u>locally derived</u> in relation to the issue that the policy is intending to influence and should be justified on the specific local circumstances.</p> <p>This policy suggests you need planning permission for change of use from residential, C3 to holiday let which the policy classes as Sui generis use. Such a change does not normally require planning permission as no material change of use has occurred and according to the case law, whether a change from residential to holiday let amounts to a material change of use is a matter of fact and degree in each case (as explained in the BNP evidence. It is not true that any change to holiday use will inevitably be material, nor is it true that any such change will never be material. As a broad guide, a change of use of a house to holiday letting where it would be likely to be occupied by family groups as a single household is unlikely to amount to a change of use requiring planning permission.</p> <p>How are the significant impacts, in bullet 2, to be demonstrated?</p>						
Remedy	<p>Locally derived evidence is required to fully inform the policy approach. If it is considered appropriate that the policy should remain and there is the evidence to be justified and appropriate - then it should be clarified in pre-ambles/reasons & justification to the policy that it can cannot be applied in the majority of cases.</p>						

	Given the minimal impact together with (as currently written) the potential to give the reader a false impression of the likely impact – it is suggested that the policy is removed.
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NPSG Comments and Suggested Ways Forward From Workshop

- Agreed that this policy does conform with the NPPF, the adopted Core Strategy and the emerging Local Plan.
- This is not a duplication, legally acceptable, has the justification and applies neighbourhood specific requirements.
- While the positive impact may be small the NPSG see the any positive impact as a good outcome in a very small village like Blakeney and intend to retain the policy.

POLICY 4: Change of use from Holiday Accommodation to Residential							
Issue/Comments							
	Conformity			Repetition	Duplication	Legal	Evidence
	NPPF	Core Strategy	Emerging Local Plan?				
✓ = conforms ✗ = does not conform	✗	✗	✗		✗	✗	✗
Comments	<p>The policy implies a level of control that cannot be imposed and as such is misleading to the public. The application of proposed Policy 4 is likely to be considerably more limited than is probably currently anticipated, if it is able to be implemented and apply at all. Planning permission is generally not required for change of use from holiday accommodation to residential in most circumstances. The policy could only be applied if there is a restriction place on use by a previous planning consent, however, the comments in relation to principle residences (above) apply in this instance. In this case it would be an application to remove a condition – not a full planning application. As the ‘issue’ does not require planning permission (except in very limited circumstances) and a new dwelling has not been created - future occupation cannot be limited to principle residence. The policy is ineffective.</p> <p>This is another policy that appears to have been copied from the North Northumberland Coast NP. The BNP must to be informed by appropriate and proportionate evidence that is <u>locally derived</u> in relation to the issue that the policy is intending to influence and should be justified on the specific local circumstances.</p> <p><u>Evidence</u> The evidence presented is lacking depth and explanation and it is not clear that there is a direct correlation between the information presented and the policy. Has there been an assessment of the impact of such a policy on the housing stock in Blakeney? It may be difficult to determine how many properties exist in the NPA with a holiday occupancy condition and therefore conclude what the benefits may be over the plan period.</p>						

Remedy	<p>Locally derived evidence is required to fully inform the policy approach.</p> <p>If it is considered appropriate that the policy should remain and there is the evidence to be justified and appropriate - then it should be clarified in pre-ambule/reasons & justification to the policy that it can cannot be applied in the majority of cases.</p> <p>Given the minimal impact together with (as currently written) the potential to give the reader a false impression of the likely impact – it is suggested that the policy is removed.</p>
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NPSG Comments and Suggested Ways Forward From Workshop

- Agreed that this policy does conform with the NPPF, the adopted Core Strategy and the emerging Local Plan.
- The Core Strategy is silent on this issue, therefore, how can Policy 3 possibly be in conflict when the policy is not covered in the Core Strategy.
- This is not a duplication, legally acceptable, has the justification and links to the outcomes sought from Policy 2.
- While the positive impact may be small the NPSG see the any positive impact as a good outcome in a very small village like Blakeney and intend to retain the policy.

POLICY 5: Extensions to Holiday Accommodation							
Issue/Comments							
	Conformity			Repetition	Duplication	Legal	Evidence
	NPPF	Core Strategy	Emerging Local Plan?				
✓ = conforms ✗ = does not conform	✗	✗	✗		✗	✗	✗
Comments	<p>The policy implies a level of control that cannot be imposed and as such is misleading to the public. The application of proposed Policy 5 is likely to be considerably more limited than is probably currently anticipated, if it is able to be implemented and apply at all. Extensions to holiday accommodation are generally allowed through Permitted Development rights (unless the dwelling forms part of the small percentage of accommodation that has an occupancy restriction condition).</p> <p>What is meant by sufficient outdoor amenity space for holiday occupants? The BNP needs to define a criteria and evidence it. Residential amenity is covered in far greater detail in the emerging Local Plan and as such this loosely worded bullet is better left to the Local Plan policies.</p> <p>Bullet 2 and 3 are unreasonable and would fail in tests of reasonable approach. Application of the policy in relation to car parking would be seen as unreasonable in the historic heart of Blakeney, where many properties do not have off street car parking. Holiday cottages are often occupied by a family group often arriving in one car – how can this policy be enforced? Parking is provided free of charge off site and weekly passes available elsewhere - the policy simply cannot be applied.</p>						

	There is an inconsistency in language: holiday accommodation and holiday lets?
Remedy	You will need to define what is meant by the policy requirements and provide justification as to why that are considered necessary and important to the local community
NPSG Comments and Suggested Ways Forward From Workshop	
<ul style="list-style-type: none"> • Agreed that this policy does conform with the NPPF, the adopted Core Strategy and the emerging Local Plan. • This is not a duplication, legally acceptable, has the justification and applies neighbourhood specific requirements. • While the positive impact may be small the NPSG see the any positive impact as a good outcome in a very small village like Blakeney and intend to retain the policy. 	

POLICY 6: Infrastructure Design of New Developments							
Issue/Comments							
	Conformity			Repetition	Duplication	Legal	Evidence
	NPPF	Core Strategy	Emerging Local Plan?				
✓ = conforms ✗ = does not conform	✗	✗	✗	✗	✗		✗
Comments	<p>Why is the policy thought to be necessary and what are you trying to achieve that is not already in the existing Development Plan?</p> <p>The splitting of design related matters into infrastructure, new and replacement homes, infill, existing dwellings and drainage/flooding leads to lots of repetition and cross-over. This makes the policies extremely hard to follow and leads to confusion and conflicting ambitions.</p> <p>General lack of alignment with NPPF para 125 – in that it doesn't evidence what the special qualities of Blakeney are - that the policy approach is seeking to protect and how this should be reflected in new development.</p> <p>The policy would benefit from significant pre amble and justification.</p> <p>The approach adds nothing to the existing policy base and is a lost opportunity to specify the local distinctiveness and character that you would want developers to take account of and define the necessary characteristics that the existing strategic approach calls for. Mealy repeating the higher order elements of design components is a lost opportunity for the neighbourhood plan and unnecessary</p> <p>How does it help the determining officer address para 130 in the NPPF? Which states:</p> <p><i>“permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents.”</i></p> <p>Has a review of the BNP approach been undertaken? e.g.:</p> <ol style="list-style-type: none"> 1. What mix of types do you want? 2. What creates a strong sense of place with regard materials – be specific? 						

	<ol style="list-style-type: none"> 3. Heritage assets are covered in the Core Strategy and emerging Local Plan 4. What evidence have you that occupation is completed after the drainage and water solutions are provided? What scale of development does this apply to? 5. Parameter of massing etc., are covered in the Core Strategy and emerging Local Plan and are detailed in the NNDC Design Guide – what is meant by unacceptable in your local context? 6. The BNP is not delivering any development sites – how can this bullet be implemented? Highway safety is the remit of the highway authority and will be considered by them – at best this is an aspiration. Should this bullet just say the design of new building should incorporate off street parking and or other measures that you want to see instead of just being bland and non-directional? 7. What is meant by mitigate visual impact of the development? Landscape impact is covered in the Core Strategy and emerging Local Plan. Trees retention hedgerows landscaping are all covered in the LP and design guides. Is the character of Blakeney dependent on existing tree coverage? 8. Such standards cannot be incorporated into policy. National policy can only implement the nationally described technical standards. These can only be evoked through a Local Plan. The council intends to evoke such standards in the emerging LP – you may express support for the use of a check sheets but it will not be possible to require its use. 9. Secure by design is requirement of the policy. How does the BNP want proposals to integrate – be specific. 10. Outdoor lighting does not require planning permission as such the policy implies a level of control that cannot be imposed and is misleading. The approach needs to be hung off amenity value - see the emerging policies on pollution and amenity in the Local Plan. 11. What is appropriate in relation to renewable energy – see existing Core Strategy policy on construction standards and emerging policy on energy and carbon reduction – the bullet is a duplication / repetition. <p>Significant duplication and NO added value is obtained through this policy, on the whole it should be removed. The policy would be better off adding detail to design that the local community would support rather than seeking to duplicate and repeat existing policy</p> <p>If the BNP aim is to influence design or it is a concern the policy should be used in order to outline detail and meaning of the key components of design that are identified as important in the context of the village and wider parish (the BNP distinguish between the two). Such an approach would include elements of the remerging policies as well eg policy 7 and 8 so as to avoid the repetition. It is better to have one solid meaningful and applicable policy than numerous policies.</p>
Remedy	<p>The approach could detail the local context that should be reflected, specify materials that reflect the local texture of building, detail the form and layout that would be acceptable, include such things as how development should reflect the street frontage, etc.</p>

A background paper should be produced that reviews the existing policy requirements contained in the Core Strategy and Design Guide and also the new local plan and new design guide. Please note that the new Local Plan **REQUIRES** development to accord with it – i.e. **Comply** (with the Design Guide) **or Justify** (why an alternative approach is taken). This is a strategic approach that needs to be respected in the BNP. This is a change from the old policy which stated developers to have *regard* to the Design Guide and it is an attempt to increase the design quality of development in North Norfolk. There is therefore an opportunity through the BNP to identify specific design requirements over and above those conditioned in the strategic policy and new design guide as long as they are justified remain reasonable and does not place an onerous burden on developers.

The background paper to support such an approach needs to define the parameters meant, materials to be used and the justification for addressing issues such as water and drainage and review the exiting policy approach. The design policy of BNP needs to detail what is important and define the wording already incorporated in the NPPF and emerging local plan. The following are words that encapsulate the local context and are design principles and the BNP should use the policy to define the relevant local meaning of each.

- Context
- Urban structure
- Density and mix
- Building type
- Details and materials
- Urban grain - eg nature and extent of sub division
- Height and massing
- Façade and interface: the relationship with the street e.g. stepped back from road/ path, directly onto the street front gardens, include access to off street parking sufficient for the no of adults occupying
- street scape and landscape – paths, connections,

Use the opportunity of a policy to define what local vernacular are important and should be reflected in the design of new buildings. The BNP could usefully gain the answers from the conservation area appraisals just been undertaken

NPSG Comments and Suggested Ways Forward From Workshop

- Agreed that this policy does conform with the NPPF, the adopted Core Strategy and the emerging Local Plan.
- This is not a duplication or repetition as works with and references nationally and NNDC guidelines and best practice standards and applies neighbourhood specific requirements.
- Will continue to develop the specific criteria in relation to the overall design of development.

POLICY 7: Improving Design of New or Replacement Homes							
Issue/Comments							
	Conformity			Repetition	Duplication	Legal	Evidence
	NPPF	Core Strategy	Emerging Local Plan?				
✓ = conforms ✗ = does not conform	✗	✗	✗	✗	✗	✗	✗
Comments	<p>Please see previous comments in relation to design.</p> <p>Bullet 1 – would only apply to new development outside allocations in local plan – amend</p> <p>Approach brings nothing different other than bullet 3</p> <p>First 2 bullets, bullet 4, 5 are a repetition of policy 6</p> <p>Other bullets are considered overly restrictive. eg bullet 3 - Policies must allow flexibility and allow for specific on site considerations - this seems very prescriptive.</p> <p>What consideration has been given to viability?</p> <p>What is the purpose of the policy and what is the reasoned justification?</p> <p>What evidence's there that a dwelling should occupy only 30 % of a site? Have you thought through the implication for all plot sizes, would such an approach be seen as reasonable – whole it hold up at appeal? On a small site this could result in a very small dwelling?</p> <p>How does this equate to national policy in the efficient use of land and density requirements?</p> <p>The policy conflicts with other policies in the NP which call to respect; local character and or seek a size that is appropriate to the size of the plot? – How is this to be resolved?</p> <p>Bullet 5 – what is meant by where appropriate?</p> <p>Bullet 6 - what measures – curtains? Planning policy cannot specify internal décor?</p> <p>Bullets 4,5,6,7 are considered un reasonable and in all likelihood could not justify a refusal.</p>						
Remedy	<p>See comments in relation to Policy 6.</p> <p>Have a single, meaningful, design policy for Blakeney.</p>						
NPSG Comments and Suggested Ways Forward From Workshop							
<ul style="list-style-type: none"> Agreed that this policy does conform with the NPPF, the adopted Core Strategy and the emerging Local Plan. This is not a duplication or repetition, is legally acceptable and applies appropriate neighbourhood specific requirements that will make homes better for people to life in. This is a meaningful policy focused on home design. The NPSG will continue to develop the specific criteria to improve the quality of new or replacement homes. 							

POLICY 8: Infill Development							
Issue/Comments							
	Conformity			Repetition	Duplication	Legal	Evidence
	NPPF	Core Strategy	Emerging Local Plan?				
√ = conforms ✗ = does not conform	✗	✗	✗	✗	✗	✗	✗
Comments	<p>The policy, as whole, appears to be a duplication and potentially conflict of other polices in the BNP. Overall, considered unnecessary, unreasonable and in all probability could not be held as a reason for refusal.</p> <p>Bullet 1 conflicts with other policies in the BNP e.g. Policy 7 and also bullet 2 below?</p> <p>What are the zones? – how do these relate to bullet 1?</p> <p>Bullet 3 – not reasonable as infill, in principle, is accepted. Such views are not protected in legislation or in any policies in the BNP.</p> <p>Bullet 6 - what are the traditional materials of the plot to be retained? What is traditional and does it need to be specific to the whole of Blakeney?</p> <p>Bullet 8 - what is meant by where appropriate? In any case the <u>council has a statutory duty to protect heritage assets</u> and this is covered in legislation, the core strategy and emerging local plan. This bullet should be removed</p>						
Remedy	<p>There is scope to remove all the repetition, duplication with other development plan polices and consolidate all the design polices, infill policy, replacement homes policy into one succinct and purposeful policy that can be applied.</p>						
NPSG Comments and Suggested Ways Forward From Workshop							
<ul style="list-style-type: none"> Agreed that this policy does conform with the NPPF, the adopted Core Strategy and the emerging Local Plan. This is not a duplication or repetition as enhances existing policies and takes them to a neighbourhood level. Is legally acceptable and applies appropriate neighbourhood specific requirements that will make homes better for people to life in. This is a meaningful policy focused on home design. The NPSG will continue to develop the specific criteria to improve the quality of new or replacement homes. 							

POLICY 9: Existing Dwelling Replacement							
Issue/Comments							
	Conformity			Repetition	Duplication	Legal	Evidence
	NPPF	Core Strategy	Emerging Local Plan?				
√ = conforms ✗ = does not conform	✗	✗	✗	✗	✗	✗	✗
Comments	<p>The policy is overtly negatively phrased and, unnecessarily, repeats previous policy.</p>						

	<p>See previous comments in relation to design and infill development.</p> <p>Bullet 5 is over and above legal powers of a neighbourhood plan and should be removed. Permitted development rights can only be removed by a local planning authority, either by means of a condition on a planning permission, or by means of an Article 4 direction.</p> <p>Bullets 2 and 3 are repeats.</p> <p>Bullet 4 conflicts with the Core Strategy</p> <p>Bullet 5 - by definition the original dwelling will be demolished in any application for demolition and replacement. Remove the bullet.</p> <p>Bullet 6 - what is meant by where appropriate? How can you retain the characterful features when a building is being demolished? Characterful features need to be defined. It would be unreasonable to insist that the features of the original building be retained when it is to be demolished as such it is very likely that such a policy could not be applied and or defended at appeal</p> <p>Bullet 7 is not necessary, and cannot be applied. See section 38 of the Planning and Compulsory Purchase Act which states: “regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan <u>unless material considerations indicate otherwise.”</u> A development plan cannot state that a proposal must conform with all of its policies.</p>
<p>Remedy</p>	<p>Evidence needs to be presented which provides the reason/justification why such a policy is required – particularly the 30% element.</p> <p>The policy needs to carefully consider what it is trying to control and what will such a policy achieve?</p> <p>Overall – suggest removing the policy or a significant rewording to make the policy effective and reflect Blakeney circumstances.</p>
<p>NPSG Comments and Suggested Ways Forward From Workshop</p>	
<ul style="list-style-type: none"> • Policy is a ‘work in progress’ and is still being drafted. • Ideas are being shared to help inform and guide the development of the policy. 	

POLICY 10: Drainage and Flooding							
Issue/Comments							
	Conformity			Repetition	Duplication	Legal	Evidence
	NPPF	Core Strategy	Emerging Local Plan?				
<p>√ = conforms × = does not conform</p>		<p>×</p>	<p>×</p>	<p>×</p>	<p>×</p>		<p>×</p>
<p>Comments</p>	<p>The policy seeks to duplicate an approach already included in the Core Strategy and emerging Local Plan. Much of flood risk policy is prescribed in national policy and guidance and there is no requirement to include such a policy in the BNP. Given its generality the policy has the potential of adding a layer of confusion and complexity that is not warranted.</p>						

	There appears to be no evidence in the plan to justify the inclusion of the policy to address known issues in Blakeney.
Remedy	Remove the policy or make it site specific. e.g. if allocating site and there is a need to address a particular flooding issue. LLFA may advise that it is prudent to include flood policies however it is more useful to do so in relation to site specific proposals. The approach you have taken is a duplicate of what is required and adds no further detail to that that is already contained in the Local Plan. It is not locally distinctive and runs the considerable risk of being delated at examination.
NPSG Comments and Suggested Ways Forward From Workshop	
<ul style="list-style-type: none"> • Agreed that this policy does conform with the adopted Core Strategy and the emerging Local Plan. • This is not a duplication or repetition as enhances existing policies and takes them to a neighbourhood level. • Policy has been developed and informed with advice from the LLFA and Anglian Water. 	

THEME 2: NATURAL ENVIRONMENT

POLICY 11: Biodiversity and Accessibility							
Issue/Comments							
	Conformity			Repetition	Duplication	Legal	Evidence
	NPPF	Core Strategy	Emerging Local Plan?				
✓ = conforms ✗ = does not conform		✗	✗				✗
Comments	<p>This is a duplication of Core strategy and emerging Local Plan policies and not needed, the plan is not allocating any growth so any policy is not required.</p> <p>However, the situation in planning terms is significantly more complicated in and the Council is currently working with Habitat Regulation Assessment consultants and compiling evidence to inform an approach that will seek to enhance Green Infrastructure in order to remove the pressures off sensitive European sites that surround Blakeney. This is a cross boundary approach with other LPA's around the mitigation measures required due to visitor impacts. The emerging Local Plan will have a specific policy on this and it is likely that all development will be required to contribute financially (once the full scale of management priorities and enhancements to G.I. are fully costed).</p> <p>The health and wellbeing benefits of access to the coast, countryside and natural environment are not disputed and it is encouraging to see this recognised in the BNP policy. However, improving access to the coastline and countryside may not be appropriate in all locations or at certain sensitive times of the year (for example the ground nesting bird season). This should be reflected in the policy wording.</p> <p>The statement that "landscape proposals must form an integral part of any development design, with <i>particular</i> trees and hedgerows retained unless, following surveys, their value is deemed low in accordance with established practice", we question the use of the word '<i>particular</i>' and would suggest omitting this. Why not seek to retain all trees and hedgerows? Furthermore, what is the</p>						

	<i>established practice</i> that is referred to? Is this the British Standard (BS5837)? If so, mention it specifically. A 'low' value tree might be better referred to as a category of C or below.
Remedy	As it stands - remove policy Once the strategic policy approach is known on what is called a recreation avoidance mitigation strategy it may be possible for the BNP to add some further local priorities to the strategic approach.
NPSG Comments and Suggested Ways Forward From Workshop	
<ul style="list-style-type: none"> Agreed that this policy does conform with the adopted Core Strategy and the emerging Local Plan. This is not a duplication or repetition as enhances existing policies and takes them to a neighbourhood level and applies appropriate specific requirements that will enhance biodiversity and footpaths across and beyond the village. 	

POLICY 12: Preserve Dark Night Skies							
Issue/Comments							
	Conformity			Repetition	Duplication	Legal	Evidence
	NPPF	Core Strategy	Emerging Local Plan?				
✓ = conforms ✗ = does not conform	✗	✗	✗			✗	
Comments	External lighting is not classed as development and as such does not require planning permission so the policy requirement is above any legal requirement and as such cannot be enforced. There is a policy approach in the emerging Local Plan in relation to light pollution.						
Remedy	Remove the policy. The BNP may be able to re brand the approach on external lighting as a community aspiration.						
NPSG Comments and Suggested Ways Forward From Workshop							
<ul style="list-style-type: none"> Agreed that this policy does conform with the NPPF, the adopted Core Strategy and the emerging Local Plan. Dark skies is a key issue for the village that wants to retain the dark night skies that characterise Blakeney. Pollution, including light, is a planning consideration and where the impact of development is being considered proposals can incorporate specifics to help understand the likely impact. While it is difficult for NNDC to have a specific policy that can work across the entire district the BHNP can be much more specific to the character of the Neighbourhood Area. 							

POLICY 13: Open Space Preservation							
Issue/Comments							
	Conformity			Repetition	Duplication	Legal	Evidence
	NPPF	Core Strategy	Emerging Local Plan?				
√ = conforms ✗ = does not conform					✗		✗
Comments	<p>A number of open spaces are designated in the Core Strategy and will be carried over into the emerging Local Plan as such. The BNP should take into account the Amenity Green Space review that was undertaken and as published is a source of evidence.</p> <p>The approach seems to be an aspiration – there is no policy value attached to table 1 and even if there was it would be hard to justify the designation of some of the listed sites.</p>						
Remedy	Remove the policy or rebrand by adding text that explains the current approach to open space and local green space which is included in the Core Strategy and emerging Local Plan.						
NPSG Comments and Suggested Ways Forward From Workshop							
<ul style="list-style-type: none"> • Policy is still being developed. • Initial ideas being shared to help inform and guide the development of the policy. 							

POLICY 14: Sustainability of Open Spaces							
Issue/Comments							
	Conformity			Repetition	Duplication	Legal	Evidence
	NPPF	Core Strategy	Emerging Local Plan?				
√ = conforms ✗ = does not conform					✗	✗	✗
Comments	<p>Presume this policy applies to public open space?</p> <p>The policy already exists in the Core Strategy and emerging Local Plan it is a duplication.</p> <p>The policy implies that the NNDC would be willing to take on the responsibility - which is not generally the case. It is unlikely that NNDC would adopt - if any open space included SUDS.</p> <p>Would the PC be willing to adopt such open space (with or without SUDS)?</p>						
Remedy	It would be better if the policy was explicit in saying that the PC will take over the running and maintenance of the public open space.						
NPSG Comments and Suggested Ways Forward From Workshop							

- This is not a duplication and is legally acceptable – a similar policy exists in many other adopted neighbourhood plans.
- The policy clearly sets out the expectations should a developer be seeking the Parish Council to take ownership. Likewise, should a developer intend to hand off to a management company the ask is about viability of future management.

THEME 3: LOCAL ECONOMY AND TOURISM

POLICY 15: Local Employment							
Issue/Comments							
	Conformity			Repetition	Duplication	Legal	Evidence
	NPPF	Core Strategy	Emerging Local Plan?				
✓ = conforms ✗ = does not conform	✗	✗	✗		✗	✗	✗
Comments	Again, this policy doesn't comply with NPPF policy requirements in relation to achieving sustainable development (para 8) and building a strong, competitive economy (chapter 6). Furthermore, by restricting the use to the policy does not comply with national policy. Does 'new employment appropriate to a coastal village' include tourism? Surely, the Blakeney economy is highly dependent on the tourist economy? The approach to employment appears to fail to recognise Blakeney's biggest employer - Blakeney Hotel. As the policy currently stands, by supporting home working, the approach could provide justification for development of any type of dwelling, anywhere, as long as it provides home working opportunities. This is in contradiction to other policies in the BNP.						
Remedy	Revise substantially or remove						
NPSG Comments and Suggested Ways Forward From Workshop							
<ul style="list-style-type: none"> • Agreed that this policy does conform with the NPPF, the adopted Core Strategy and the emerging Local Plan. • This is not a duplication, is legally acceptable and applies appropriate neighbourhood specific requirements • Consider rewording criteria 2 as the NPPF encourages support for the growth of all types of business whereas this limits it to businesses "appropriate to a coastal village or agriculture or traditional industries". The question will be - how it is to be determined whether a business is appropriate to a coastal village? Or is it the impact of undertaking the activity that should be limiting? • In criteria 3 may be good to change 'adverse' (how measured) for 'significant' as recognised in the NPPF. 							

POLICY 16: Tourism							
Issue/Comments							
	Conformity			Repetition	Duplication	Legal	Evidence
	NPPF	Core Strategy	Emerging Local Plan?				
✓ = conforms ✗ = does not conform	✗	✗	✗		✗	✗	✗
Comments	<p>The approach wrongly attributes legislation and exceeds the powers of a NP and the policy should be removed.</p> <p>What is the PC trying to achieve through this policy? The local planning authority is the responsible body in law for environmental impacts and when an EIA is required it is done so through prescribed regulations. Legislation requires that impacts are avoided in the first place before any mitigation can occur. The policy adds nothing to the existing approach's contained in the development plan and other national legislation.</p> <p>As currently worded seeks to maximise the facilities [it is assumed that these are tourist facilities although these are not specified in any detail and could refer to any development] in Blakeney for the benefit of residents and visitors etc. And makes reference to the need to minimise the social and environmental impact. It should be recognised that not all types of tourism related development would be appropriate in Blakeney and this should be clearly identified in the Policy wording at the start of the policy text. we would also caution against the use of the word 'maximise' and would prefer to see 'sustainable' tourism growth promoted Any tourism related development proposal seeking to increase tourist provision or numbers is likely to require individual HRA (regardless of what the BNP policy says or does not say).</p> <p>There may be opportunities for the growth of sustainable tourism in the area which can, for example, identify opportunities for traffic management to reduce the impact of traffic congestion, rationalise car parking and encourage low-impact travel, or help manage the increased numbers of visitors (expected as a result of climate change) and the impacts of climate change itself, such as rising sea levels and coastal squeeze. However, this should not be done in isolation and Blakeney Parish Council will need to work in partnership with tourism and recreational providers, users and the Norfolk Coast Partnership to find innovative ways to manage visitor pressure and congestion so it does not detract from its sense of place and landscape character. It would be useful if the policy wording could reflect these requirements.</p> <p>In terms of the policy 'criteria', the NPPF requires development to avoid impacts to biodiversity as a starting point (the mitigation hierarchy). Currently the policy wording suggests that any tourism related development would be considered acceptable as long as the impacts are assessed and if possible mitigated or managed. I refer back to my previous point, in that not all types of tourism related development would be acceptable. The first two 'criteria' suggested are not really criteria, they are more processes. I would suggest more appropriate</p>						

	'criteria' would be that tourism related development must demonstrate how it is sustainable and meets with the opportunities identified in the National Character Area Profile (by Natural England) and the AONB Management Plan.
Remedy	Remove the policy
NPSG Comments and Suggested Ways Forward From Workshop	
<ul style="list-style-type: none"> • Agreed that this policy does conform with the NPPF, the adopted Core Strategy and the emerging Local Plan. • This is not a duplication, is legally acceptable and applies appropriate neighbourhood specific requirements. • The ambition clearly sets out what this policy is seeking to achieve. • The policy adds support and encouragement. • Whilst NNDC, as the LPA, undertake the EIA assessment where required this BNHP policy is seeking a different sort of assessment to be provided by a developer in relation to the impacts on specifics on the village and wider area outside of the EIA. • Policy still being development and likely to be changed. 	

Appendix 9

Emerging Policies – Statement Review

THE BLAKENEY NEIGHBOURHOOD PLAN

THE BLAKENEY NEIGHBOURHOOD PLAN



Emerging Policy Statements Discussion Document August 2018



THE BLAKENEY NEIGHBOURHOOD PLAN

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THE BLAKENEY NEIGHBOURHOOD PLAN



1.0 Executive Summary

The purpose of this document is to inform the Steering Group's discussion around which of the emerging statements should be taken forward and developed into planning policies for The Blakeney Neighbourhood Plan.

This document captures the feedback received from the community consultation event held in Blakeney Village Hall on Saturday 28 July 2018.

As part of the event we consulted on forty-four emerging statements. We assessed the level of local support by asking residents and stakeholders for their views about each statement and invited any additional suggestions and comments.

The consultation also included display boards providing feedback from the previous consultation event in addition to local demographic data from census records and Norfolk Insight.

Section 3.0 of this document provides a detailed analysis of the views received on each emerging statement.

Section 4.0 gives an overview of how each of the statements were rated; statements receiving the most interest, those receiving the most positive support and those receiving the least support.

The additional comments and suggestions received at the event are reproduced in full, for consideration by the Steering Group, in Appendix 1.

This document will be used by the Steering Group to assist in their decision-making by assessing the level of support for each emerging statement and reviewing each of the additional suggestions received. This assessment will be used to inform the development of planning policies for the Neighbourhood Plan, which ultimately will shape and guide future development in Blakeney.

2.0 Introduction

The local community were invited to come along and *'Have your Say!'* at the community consultation event in Blakeney Village Hall on Saturday 28 July 2018. The event was advertised in Edition 2 of the Neighbourhood Plan newsletter hand-delivered to every household and business in the village, in The Glaven Valley Newsletter and on the Parish Council website.

An invitation to the consultation event was emailed to over 90 stakeholders, including local businesses, community groups, local developers, utility companies, housing associations, statutory bodies, the local member of parliament, County and District Councillors, local authority planning, housing and highways officers.

The purpose of this document is to capture the feedback received from the consultation to inform the Steering Group's discussion around which of the emerging statements should be taken forward and developed into planning policies for the Neighbourhood Plan.



3.0 Consultation Feedback & Analysis

3.1 Background

At the event we consulted on forty-four emerging statements, grouped by five policy themes and presented on a number of display boards. People attending the event were asked to indicate which of the following best described their views about each statement:



The classification is used throughout this document to graphically illustrate the extent of support shown for each statement - from dark green indicating 'Strongly Agree' to red indicating 'Strongly Disagree'.

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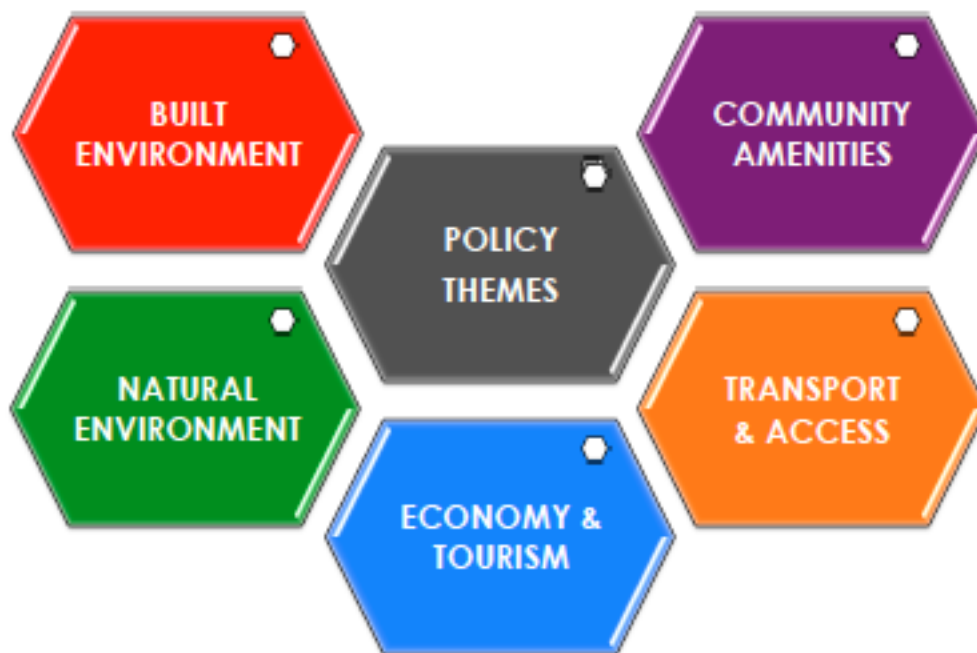
People attending the event were also given the opportunity to add any additional comments and aspirations by writing them on 'post-it' notes and sticking these to the display boards. These are reproduced, in full, in Appendix 1.

3.2 Analysis by Policy Theme

This section presents the findings from the community consultation.

The findings are grouped by each of the five policy themes. An analysis of responses for each statement is given with additional comments and suggestions reproduced in full in Appendix 1.

The themes are colour-coded – as indicated below - to aid navigation through the document.



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BUILT ENVIRONMENT

We consulted on eighteen emerging statements under this policy theme. The table below lists each statement and its reference number:

Ref.	Statement
BE1	More affordable housing specifically for people with a local connection.
BE2	Support new housing that is lower market cost dwellings.
BE3	Support new housing that is affordable rented accommodation.
BE4	New developments should provide a mix of housing types & sizes.
BE5	Limit the number of second homes.
BE6	Land should be made available for 'self-build' properties.
BE7	Development should only be in small-scale clusters to protect unique natural beauty of Blakeney.
BE8	Constrain development that is outside the settlement boundary.
BE9	Infill developments (gardens converted to houses) should be resisted.
BE10	Where an existing home is replaced the new house should be limited to the footprint of the existing home.
BE11	Construction materials and finishes should reflect building styles & types characteristic of Blakeney. What specifically?
BE12	All new development should encourage the use of renewable green energy.
BE13	Design layouts to include provision for storage – cycles, wheelie bins, etc...
BE14	Designs should incorporate principles to allow people to stay in their homes as long as possible.
BE15	On-road parking should be encouraged to reduce pavement parking? If so, where?
BE16	Each new home should have at least a parking space per bedroom
BE17	Improve drainage on Saxingham Road. Where else?
BE18	Ensure all drainage solutions are implemented prior to any occupation of new homes?

This theme received considerable interest at the consultation event, with almost half of the statements (BE1, BE3, BE5, BE7, BE9, BE10, BE11 and BE16) appearing in the 'TOP TEN' statements receiving the most interest¹.

Statements about affordable housing (BE1 and BE3) and development in small clusters (BE7) were unanimously supported and feature in the Top Ten most positively supported statements. Notably BE7 received the most support of all 44 statements in the consultation with everyone who commented strongly agreeing that development should only be in small-scale clusters to protect the natural beauty of Blakeney.

¹ Statements receiving the most responses – both positive and negative.

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The least supported statements in this theme were on-road parking (see Fig.1), parking spaces for new homes (see Fig.2) and limiting replacement of a home to footprint of the original dwelling (see Fig.3)

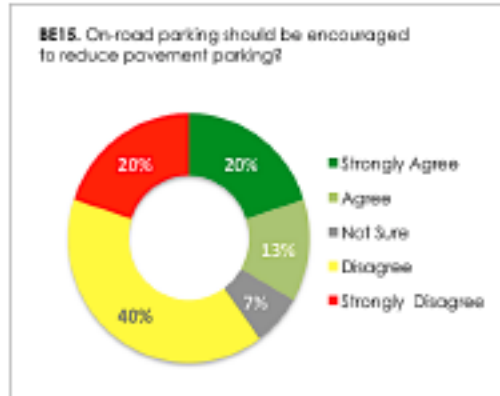


Fig.1.

BE15: is the least supported statement in this theme and second least supported of any statement in the consultation with 60% disagreeing.

Comments include that on-road parking is a nuisance, which needs enforcement and that pavement parking is taken as 'norm' creating difficulties for those with pushchairs and for elderly residents. An alternative view was also expressed – that on road parking can reduce road speed and make roads safer for pedestrians.

BE16: divided opinion with marginally more disagreeing than agreeing - 52% against compared to 45%, supporting.

Concerns were raised that having a parking space per bedroom encourages 'AirBnB'.

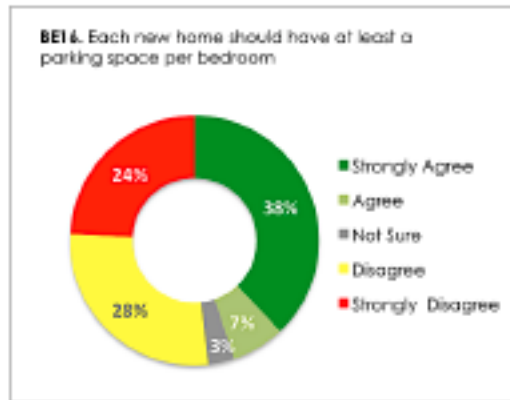


Fig.2.

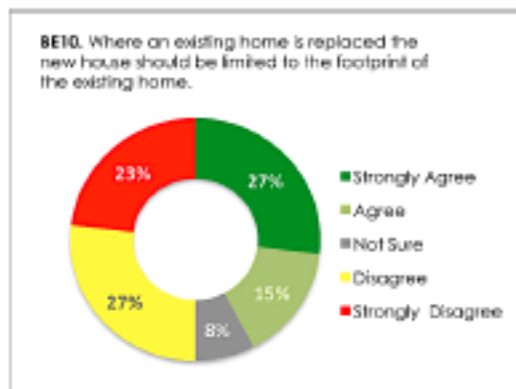


Fig.3.

BE10: also divided opinion with 50% against, 42% supporting and 8% unsure.

This is seen as the balance between improving and enhancing a specific site with possible 'over development' of a site (see Fig.3).

An analysis of feedback on all eighteen statements is given in Fig.4 overleaf.

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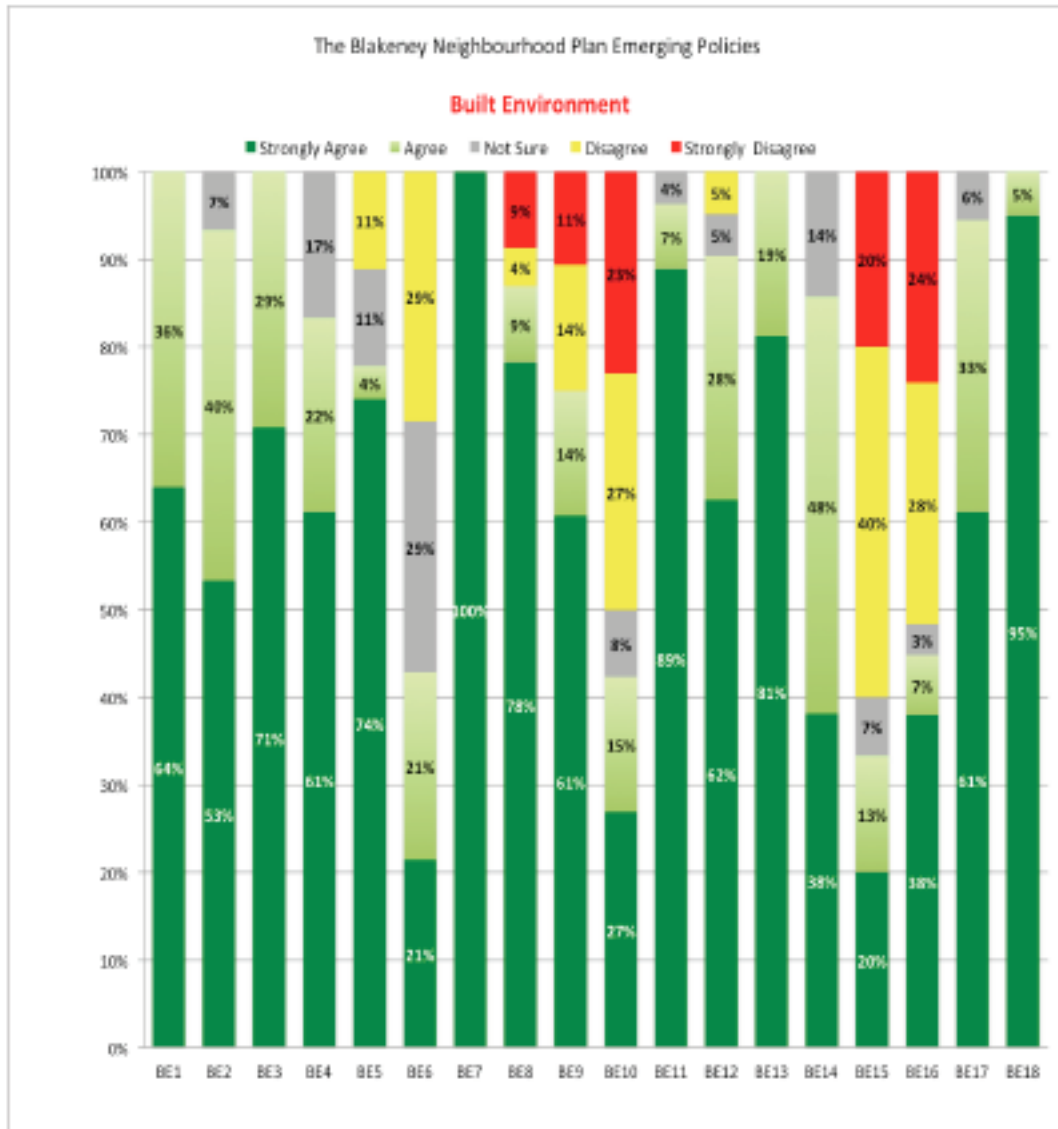


Fig.4

NATURAL ENVIRONMENT

We consulted on ten emerging statements under this policy theme. The table below lists each statement and it's reference number:

Ref:	Statement
NE1	Preserve and enhance local distinctiveness in the built and natural environment. How specifically?
NE2	Protect recreational areas and enhance green spaces for recreation and wellbeing. Specifically where?
NE3	Protect land used for agricultural purposes.
NE4	Encourage active measures to reduce pollution and its impact. Specifically what ?
NE5	More green open space, footpaths and cycleways, which are easily accessed and safe to travel. Where to where?
NE6	Support steps to reduce the risk of flooding from rain, seawater and sewerage. Are there any specific problem areas?
NE7	Protect and maintain the marshes and nature reserves.
NE8	Introduce more natural & native planting (such as wildflower meadows & hedgerows). What else & where?
NE9	Introduce more wildlife friendly features into developments (such as ponds, hedgehog friendly fencing, bird boxes, and bat tiles). What else?
NE10	Secure wildlife corridors and access to the marshes and countryside. Where ?

This theme was generally well supported with only three statements (NE3, NE8 and NE9) receiving any adverse feedback - albeit a minority view (10% or less) in each case.

NE4 is the statement in this theme that those commenting were least sure about with 21% 'Not Sure'. (See Fig.5)

A number of suggestions were given about this, mainly around minimising light pollution – starting with the lights on the village hall but also reducing car pollution – including reducing cars in closed areas, introducing and implementing "No Idling" notices. (See Appendix 1 for details).

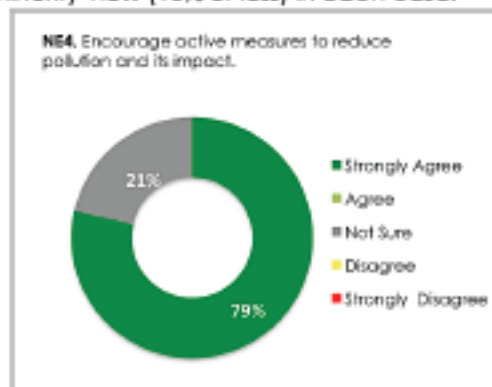


Fig.5

An analysis of the feedback on all ten statements is given in Fig.6 overleaf.

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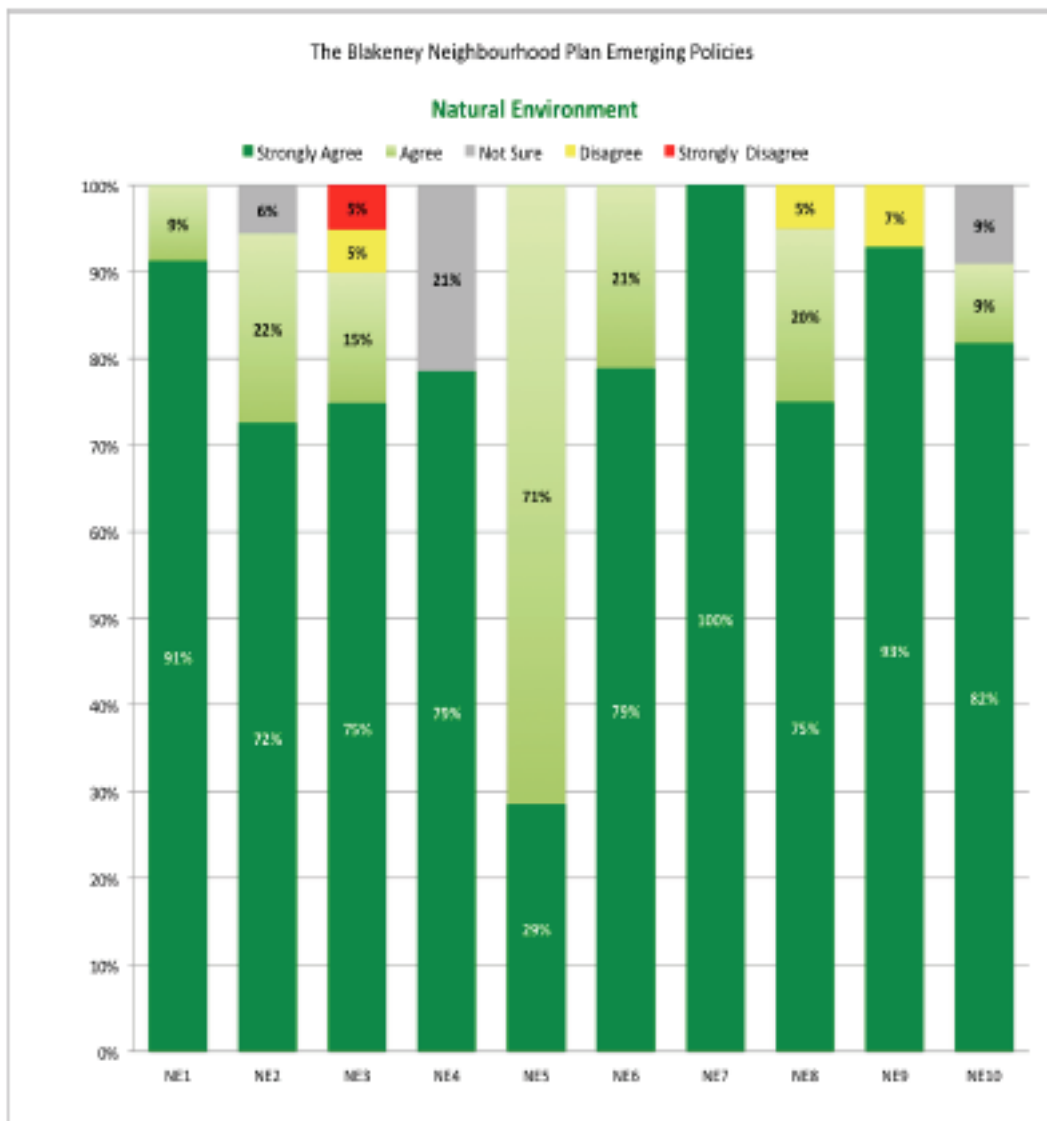


Fig.6

THE BLAKENEY NEIGHBOURHOOD PLAN

ECONOMY & TOURISM

We consulted on four emerging statements under this policy theme. The table below lists each statement and it's reference number:

Ref:	Statement
ET1	Promote more local employment appropriate to Blakeney.
ET2	More shops that offer a greater choice to reflect residents' needs. Specifically what?
ET3	More tourism will destroy the character of village. How ?
ET4	Support small-scale employment & conversion of buildings provided they do not negatively impact on character of the village or amenity of residents. Such as ? Where & what specifically?

This theme clearly divided opinion (as illustrated in Fig.7). While statements about supporting more small-scale local employment (ET1 and ET4) received unanimous support, ET2 and ET3 were more controversial.

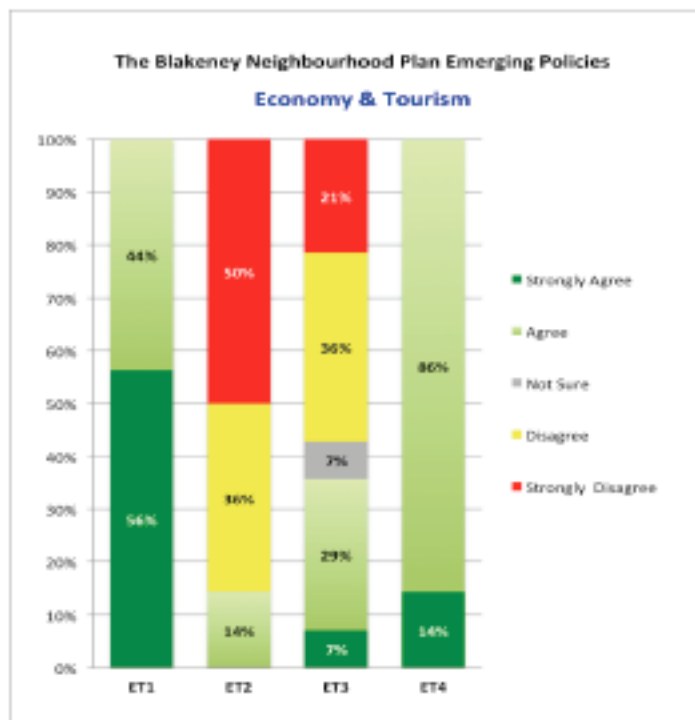


Fig.7

ET2: 86% disagreed with the need for more shops – commenting the village is already well served and it's hard to see what else would thrive. An alternative view was given suggesting the need for a Hairdressers and a book/stationery shop. (Notably ET2 was the least supported statement of any in the consultation).

ET3: 57% disagreed that more tourism would destroy the village character, whereas 36% thought it would and 7% were unsure of the impact.

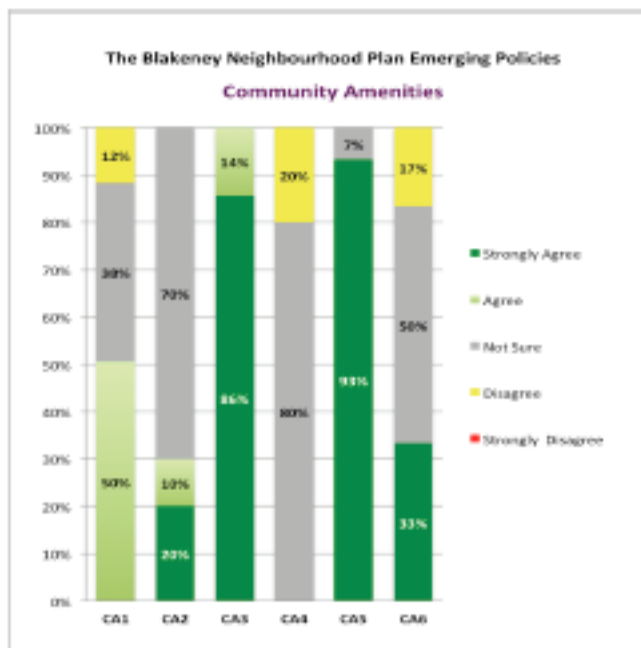
Those who did comment said tourism makes the village too busy and that tourist development needs to benefit residents too.

THE BLAKENEY NEIGHBOURHOOD PLAN

COMMUNITY AMENITIES

We consulted on six emerging statements under this policy theme. The table below lists each statement and it's reference number:

Ref:	Statement
CA1	New development should contribute to existing and new community facilities and services. Specifically what?
CA2	Improve the village hall to accommodate more or different activities or community groups? In so, in what way?
CA3	To preserve and enhance the structure of the quay. Specifically what?
CA4	Provide more facilities in and round the village? Specifically what?
CA5	New developments should demonstrate how 'open space' areas are to be managed and maintained in a sustainable way.
CA6	Support further and different facilities for specific age groups. Specifically what and how?



It is statements in this theme that residents were least sure about (see Fig.8) except for CA3 and CA5:

CA3: Enhancing the Quay - received unanimous support. Comments were added about dredging to maintain a navigable harbour, and that without this the main activity of sailing will disappear.

CA5: New developments should demonstrate how 'open space' is to be managed was positively supported with 93% agreeing.

Notably there was no support for CA4 - suggesting residents feel the village is already well served with facilities.

Fig.8

CA2 generated more uncertainty than not about whether improvements were needed to the village hall. Comments mainly referred to the construction design and décor. (See Appendix 1).

THE BLAKENEY NEIGHBOURHOOD PLAN

TRANSPORT & ACCESS

We consulted on six emerging statements under this policy theme. The table below lists each statement and it's reference number:

Ref:	Statement
TA1	Seek greater safety on the existing road network. What are the problem areas?
TA2	Install speed reduction & traffic calming measures. Specifically where?
TA3	New developments designed in a way that encourages cycling and walking to enable easy access to other parts of the village and the countryside.
TA4	Improve footpaths in Morston Road. Where else?
TA5	Support provision of new, existing and enhanced bus services. What times and to where?
TA6	Support provision of more bus stops and shelters. Where specifically?

On the whole the statements in this theme were positively supported with one exception TA6 (as illustrated in Fig.9).

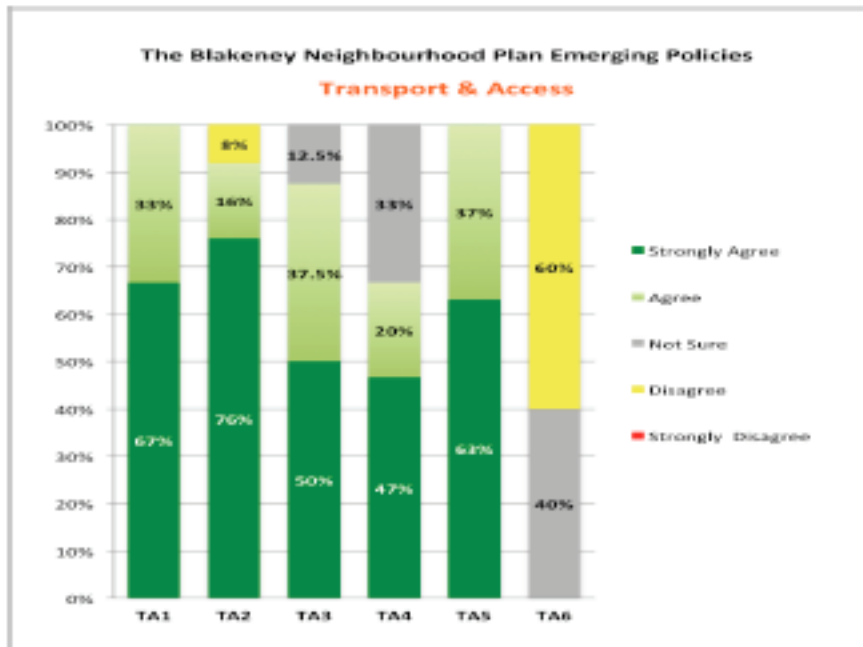


Fig.9

Interestingly TA6 received no positive support - and was the second least supported of any statement in the consultation - although there were no specific comments given on the boards to support this reasoning for the lack of support.

4.0 Appraisal Overview

This section provides an overview of the consultation feedback; the emerging statements receiving the most interest, those receiving the most positive support and those receiving the least support.

4.1 'Top Ten' - Most Interest

These are the ten statements attracting the most responses - both positive and negative - at the consultation event.

Interestingly there is not one 'stand out' statement generating significantly more interest than any other. However, **Built Environment** statements collectively generated the most interest with eight (just under half of the statements from this theme) featuring in this Top Ten.

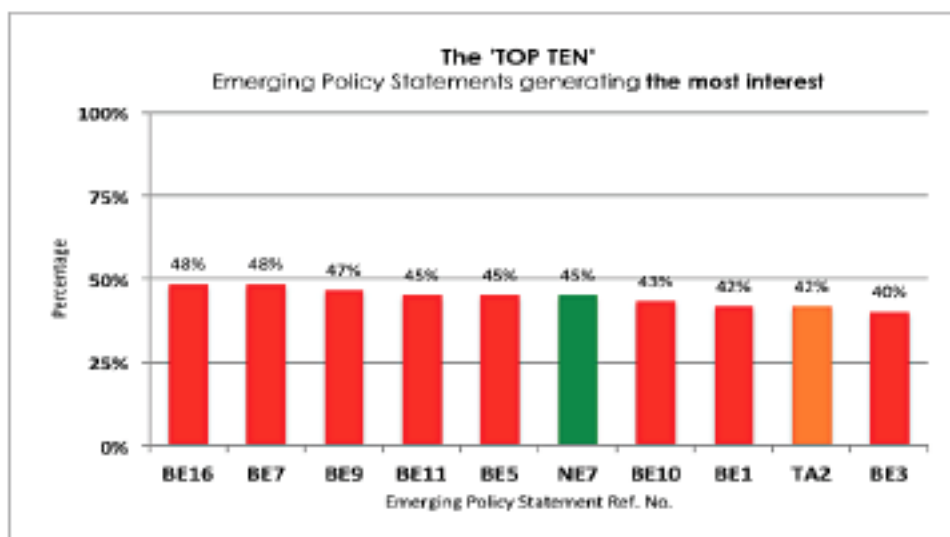


Fig.10.

As illustrated, **Natural Environment** and **Transport & Access** themes are represented with just one statement each. Neither **Community Amenities** nor **Economy & Tourism** themes feature.

Three **Built Environment** statements (BE7, BE1 and BE3) and the **Natural Environment** statement (NE7) also appear in the Top Ten most supported (see section 4.2). Whereas, statements BE16, BE9 and BE10 also appear in the least supported statements (section 4.3).

THE BLAKENEY NEIGHBOURHOOD PLAN

4.2 'Top Ten' – Most Positive Support

These are the ten statements receiving the most positive support with each unanimously supported (either 'strongly agreed' or 'agreed') by those commenting.

Rank	REF.	STATEMENT
1	BE7	Development should only be in small-scale clusters to protect unique natural beauty of Blakeney.
2	NE7	Protect and maintain the marshes and nature reserves.
3	BE1B	Ensure all drainage solutions are implemented prior to any occupation of new homes?
4	NE1	Preserve and enhance local distinctiveness in the built and natural environment.
5	CA3	To preserve and enhance the structure of the quay.
6	BE13	Design layouts to include provision for storage – cycles, wheelie bins, etc...
7	NE6	Support steps to reduce the risk of flooding from rain, seawater and sewage.
8	BE3	Support new housing that is affordable rented accommodation.
9	TA1	Seek greater safety on the existing road network.
10	BE1	More affordable housing specifically for people with a local connection.

Key: BE Built Environment, CA Community Amenities, NE Natural Environment, TA Transport & Access

As can be seen from the table, this grouping features statements from four of the policy themes. It is only **Economy & Tourism** that does not appear.

It is the desire to protect the natural beauty and the distinctive character of Blakeney, with more affordable housing for those with a local connection, together with combating flooding and drainage.

As previously reported BE7, NE7, BE3 and BE1 are four of the statements that attracted the most interest at the consultation event.

4.3 'Top Ten' - Least Supported Statements

These are the statements receiving the least support at the consultation, with the percentage representing those who either 'strongly disagreed' or 'disagreed'.

As illustrated, four themes feature in this grouping. It is predominately the **Built Environment** that features and only the **Natural Environment** that does not appear with two statements each from the **Community Amenities** and **Economy & Tourism** themes.

Notably **ET2** received the least support of all with 86% of those commenting not supporting more shops that offer a greater choice to reflect residents' needs, suggesting the village is already well-served and that shops reflect demand.

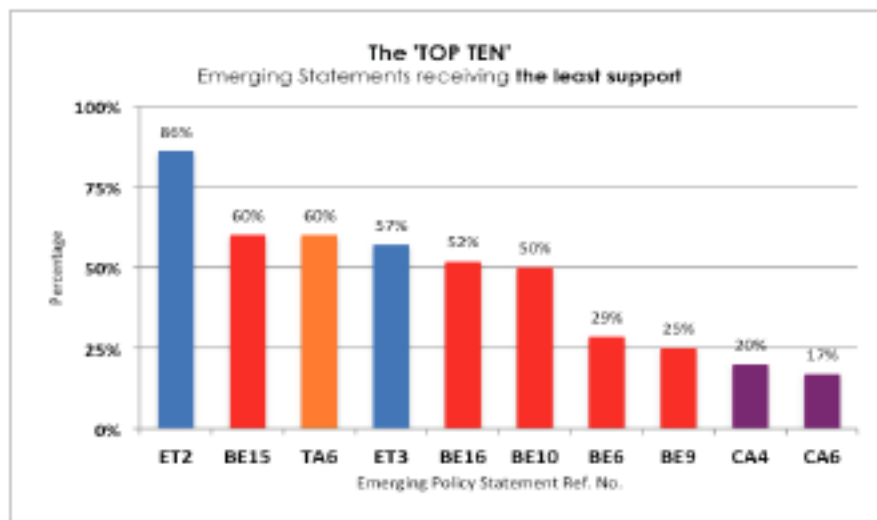


Fig.11.

Key: BE Built Environment, CA Community Amenities, NE Natural Environment, TA Transport & Access

5.0 Next Steps

This document will be used by the Steering Group to assess the level of support for each emerging statement and to review each of the additional ideas received.

This assessment will be used as part of developing the planning policies for the Neighbourhood Plan, which will ultimately shape and guide future development in the Blakeney Neighbourhood Area.

BUILT ENVIRONMENT

Affordable Housing

- Careful consideration must be given to those who need to both live & work in the village. => What is Affordable Housing?
- As Rector I have come across young couples/families working in the community wanting/needing to live locally but unable to afford to. These are not necessarily locally-born people but people who move to the area to take up jobs in the school, NWT, National Trust, care professions.
- When will there be discussion on the location of affordable housing & other development.
- Consider formation of Community Land Trusts.

Second Homes

- Housing just for locals - no second homes.
- Define 'second homes' ie. housing to let - this should be reduced.
- How could we limit the number of second homes? Through what mechanism? Market will find equilibrium but build social housing!
- In my experience I find that people who have second homes to use themselves for holidays & often retire here are people who 'invest' in the community, using shops and amenities. I would like to limit those who buy to let out for others to use for holidays. I think there is a significant difference between the 2 groups of people.
- New houses should only be built that are suitable for permanent living. They may be sold as a second/holiday home but should have space/facilities to be a full time home.

Preserving Character

- High priority must be given to preserving the character of Blakeney's built environment - presumption against ruining/developing traditional properties into 20th Century.
- Need to emphasise the Conservation criteria related to the spaces around buildings and the general character of the village. This should be statutory requirement.
- Consult, use English Heritage bodies to define acceptable materials and styles. Allow some fuel efficient/ modern designs on outskirts.
- Materials but also scale & style should be in keeping.
- Depends on position. Certainly in centre of village but not important outside provided good design.
- Red brick, flints, pantiles, Dutch influence, cottage style, Barn/Granary/Boathouse NOT steel, lots of glass, stainless steel flues/chimneys
- Brick/Flint/Clay pantiles, wooden framed windows, wooden doors, brick chimneys. COMMENT added to this "Only if youre rich enough"
- Flint should be incorporated in all new buildings. It enhances the village and will in the future be of added interest.
- Have a full Conservation Area Appraisal to identify unlisted buildings to preserve.
- Limit infill build.

Renewable Energy

- Preserve embedded energy by keeping existing buildings - no "demolish & rebuild"
- Renewable green energy gains are only obtained via economy of scales not sacrificing other environmentally important contributors.
- Do not allow solar panels in Conservation Area or visible from AONB.
- Do not allow solar panels, masts, signage etc. See Conservation Area Assessments/Appraisals.

BUILT ENVIRONMENT

Housing Design – 'Homes for Life'

- All doors should of wheelchair/walking frame width & where house is large enough have accessible downstairs toilet & room for level access shower.
- Outside doors should not be up flights of steps so can be easily ramped if required.
- Houses should be built with a view to ageing population ie. downstairs showers or more rooms downstairs.

Parking

- On road parking can be a considerable nuisance, particularly in Queens Close.
- Leave parking as at present but enforced/managed. Do not erect signage or municipal posts.
- Parking on the pavement is taken as 'norm'. Creates great difficulty for those with pushchairs & elderly residents.
- Manage what we have already. Enforce current parking.
- Parking should be in car parks. If car parks are full visit another village!
- No. Encourages AirBnB.
- On road parking can also reduce road speed and make roads safer for pedestrians. Eg. Langham Rd, New Rd.

Drainage

- Drainage on Morston Road - pedestrians get soaked when there are puddles.

General

- We are looking overcrowded already

NATURAL ENVIRONMENT

Preserve and Enhance Local Distinctiveness

- Avoid "trendy" modern design of buildings which intrude into the distinctiveness of the area.
- Avoid "storage container" type builds.
- Apply NPPF & Local Plan policies. Exceptions must be exceptions for exceptional benefit. Give proper regard to the AONB/SSSIs/SACs protections.
- New houses should not be so high as to dwarf the surrounding area (crossroads new houses for example). Developers should not be allowed to cram in too many houses into small spaces (ie. Kimberley on New Rd).

Enhance Green Space

- New Road/Saxlingham Rd junction - keep green - no hedges lost please.
- Ensure 'enhancing' doesn't mean 'spoiling'.
- All green belt should be protected.

Pollution

- Avoid light pollution, ensure green space remains for wildlife.
- Minimise light pollution - new & existing development.
- Pollution - reduce cars in closed areas.
- "No Idling" notices and strong implementation.
- Minimise light pollution - start with lights on this village hall, some of which stay on all night! Surely could be movement sensitive?

Marshes and Nature Reserves

- Ensure wildlife areas are kept wild/natural & do not become theme parks.

Wildlife Corridors and Native Planting

- River Glaven/Glaven Valley Wildlife Corridor. Open spaces - do not over manage or try to gentrify.
- Stop over-development - insist on more lakes, paths, lanes for wildlife & vegetation to flourish.
- Delighted to see the wildflower areas on the Pastures.
- The Pastures - maintain the bramble area - butterflies and wildflowers

Footpaths and Cycleways

- Create cycle/walking days when minor roads are closed so families can go for rides/walks without fear of cars.
- Consider closing sections of road for family walking/cycling days creating routes/circuits of different distances which interlink.
- Provide safe crossing at top of hill on Morston Road by short footpath on south side.
- More cycleways (get bikes off roads dangerous).
- Roads not safe for cyclists.
- There should be improved pedestrian footpaths at the top of Morston Road.
- CRUCIAL to retain a footpath and/or grass border between rear of bungalows at Kingsway and new development - BLA04.
- Cycle crossing somewhere on main road.

Flood Risk and Drainage

- The Quay perfect example - sewage manhole blow in flash flooding.
- Improve storm drains in High Street.
- Avoid building in areas of flood risk.
- Infrastructure (drains/sewerage) cannot support more population.

COMMUNITY AMENITIES

New Development should contribute to Community Facilities?

- The problem with this suggestion is that Developers will survey opinions by promising "the earth" IF their development goes ahead. These promises are rarely fulfilled.
- Double edged sword would hope that size of developers would be very modest. Do not want development creating further development.
- New development should enhance the available green space and natural habitat and contribute to its upkeep/preservation.

Village Hall

- Village Hall is very bland & does not set a very good example for style/materials/design. Floodlighting is very harmful on outdoor playing courts.
- The village hall is a great space to hold events, but the décor is off-putting. It needs a revamp as it has great potential.

The Quay

- Improve NW side of Quay.
- Stop boats mooring from Nov-Feb inclusive.
- Important to dredge the Quay to maintain a navigable harbour.
- Channel needs dredging otherwise the main activity sailing will no longer exist.
- No to dredging. Yes to preventing erosion on the bend & protect slipway.
- Quay/Channel must be maintained to keep Blakeney as it is.
- Do whatever experts say to keep it so, dredging etc.
- A regular ferry service would help to keep a navigable channel.
- Introduce a "Code of Conduct" for boat owners.
- Quay & Channel to be maintained/dredged to enable boats to keep using it for everyone.

Management of Open Space

- Open space to be maintained with Village boundary.
- Preserving open spaces in the village is a must and any already abused should be restored.
- All open spaces/green spaces to be retained. Ensure all existing open/green spaces are recorded eg. Mariners Hill & land at the bottom of Mariners Hill next to the toilets.

Further & Different Facilities for all age groups

- Create more circular walks around the village to encourage exercise.
- Job Clubs, Canoeing & Sailing lessons.
- Mental Health Support, Citizens Advice.

TRANSPORT & ACCESS

Road Safety

- Traffic lights at crossroads of Back Lane, High St, New Road & Wiveton Road ?motion sensitive.
- Junction of Wiveton Rd, Back Lane & High Street. Dangerous.
- Crossing the Langham Rd in high season is difficult, especially if you're not a fast mover!
- Sat Nav do not take vehicles the correct way & get stuck on Little Lane.
- Traffic congestion in High Street in Summer.
- Proximity of speeding traffic to cyclists and people walking is too close and thus dangerous.
- Allow some of the challenges to traffic flow to remain since they self-govern & limit the problems.
- "Reduce Back Lane Coast Road (see Cromer)".
- Traffic lights at junctions.
- Manage parking to existing areas & overflow areas.
- Emergency Services have difficulty esp. in the evening getting down High St.
- Make safer crossing off Morston Road at top of hill.

Speeding and Traffic Calming

- Speed and volume on High St. Huge vehicles. 5mph limit?
- Through the village 30mph - a joke!
- Uniform speed limit restriction to 30mph.
- Do not install additional signs/measures (if essential use natural materials & design to be sympathetic).
- Traffic calming on Coast Rd. 20mph as per Cley & Stiffkey.
- Speeding on New Road.
- Speed reduction urgent in Back Lane.
- Traffic really fast on New Road. We should have the smiley face signs that flash up the speed of cars going through village.
- The majority of vehicles travel thru' and around Blakeney in the wrong gear and too fast without adequate consideration for all other roadusers including those on pavement.
- These can have unintentional results such as increased noise and pollution to adjoining properties.
- New Road & Morston Road.
- Reduce speed in Morston Rd & New Rd to 20mph. Do not have flashing signs or more traffic signs.
- Please could we have more traffic calming on eg. Langham Rd?
- Sleeping policemen Back Lane.
- New Road.
- Strongly support TA2 especially in Back Lane.
- Enforce speed in Back Lane.

Footpaths and cycleways

- Create more 'circular' walks locally (eg. Return path Cley to Blakeney on south side of marsh).
- Improve footpath Morston Rd.
- Develop existing walkways. Public footpaths away from cars and fumes.
- Morston Road pavement opposite Garage -> Langham Road narrow & does not give room for people to pass.
- Ensure footpath to Cley is free of hedge & grass encroachment.
- Continual maintenance of footpaths on main road required.
- Footpath along New Rd/Coast Rd thru' Blakeney is dangerous! As it is either non existent or too narrow & thus too close to speeding vehicles.

TRANSPORT & ACCESS

One-Way System

- In the Season time one-way traffic plus sleeping policemen in Back Lane.
- One-way system round the Quay
- No one-way system.
- One-way system during summer months.
- Temporary one-way system in High Street & Westgate.

Enhanced Bus Services

- Buses to Holt few & far between.
- More direct bus service to Fakenham would be useful.
- Improve info about bus availability and fares.
- More bus services to Fakenham & Wells.
- Support provision of new/existing bus services.
- Improved service to Holt. Connect bus & train at Sheringham.

Provision of Bus Stops/Shellers

- Morston end of Morston Rd.

General Comments

- Dog poo in Little Lane - top marks to Jennet Tilley.
- Very good for local businesses.
- Not good for Coast Line - too many people spoiling it.

ECONOMY & TOURISM

Support Local Employment Appropriate to Blakeney

- Barns - Workshops. Summer Based Shops. Pop Up Shops.
- Chandlers needed for sailors
- Chandlers would be useful

Greater Choice of Shops for Residents

- Shops will reflect demand. Therefore, village is already well served (Spar Shop, Deli, Westons) its hard to see what else would thrive.
- What about a hairdresser?
- Village has all required as regard to shops. No more.
- Hairdressers. Books, journals, stationery etc.

Tourism

- Tourism makes village too busy.
- We are busy enough. Too much noise and mess.
- Tourist development needs to benefit residents too.

Support Conversion of Buildings for Small-Scale Employment

- Barns. Workshops.
- Don't allow existing business premises to become accommodation sites. Encourage craft & small businesses by converting outbuildings etc.
- OK but do not permit conversion of shops/workshops to residential.

Appendix 10

Newsletters and Posters

Newsletters – Edition I

Launch – 3 February
THE BLAKENEY NEIGHBOURHOOD PLAN
 EDITION 1
 January 2018

COMING SOON


HOW TO GET INVOLVED...

Steering Group comprising of local residents, parish councillors and stakeholders has been set up to produce the Blakeney Neighbourhood Plan. The Group will be holding regular open meetings. Details of future meetings can be found on the Parish Council website www.blakeneyparishcouncil.co.uk

Saturday 14 February
Blakeney Village Hall
 Just turn up between 10am and 2pm
 Find out what's what's all about.
 Be part of it and make a difference!

Newsletters – Edition II

EDITION 2
July 2018



BLAKENEY NEIGHBOURHOOD PLAN

Welcome to our second newsletter. In this edition you will find details of the vision and aims for our Neighbourhood Plan and results from the recent consultation activities...

SATURDAY 28th JULY 2018

Place this date in your diary as your opportunity to have your say on the future of Blakeney. The Village Hall doors open at 10am, drop in and see us any time before 2pm.


HISTORY OF THE NEIGHBOURHOOD PLAN

Thoughts about a Neighbourhood Plan for Blakeney have been bubbling around for some time and last year work commenced in earnest.

In February so many of you joined us at the Village Hall to share ideas and comment on what you most liked, least liked and would change about Blakeney. Please see pie chart opposite and visit the webpage on the Parish Council website for a summary of the feedback.

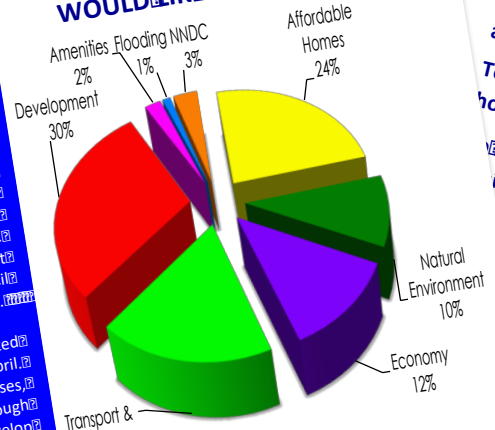
Thank you to everyone who completed and returned the questionnaire in April. With such a large number of responses, 225, we have been working through what you said was important to develop the vision and aims (see overleaf).

Moving on to the next stage we need your help again. The Steering Group will be holding the next community event at the Village Hall on Saturday 28th July to obtain your views on key areas that could become the policies in the Neighbourhood Plan.



Have your say

WHAT RESIDENTS SAID THEY WOULD LIKE TO CHANGE...



Category	Percentage
Development	30%
Affordable Homes	24%
Transport & Access	18%
Economy	12%
Natural Environment	10%
Flooded NNDC	3%
Amenities	2%

Constant themes that residents raise about planning are too much development, affordable housing, lack of character, size of replacement buildings and what is considered just unsuitable. A Neighbourhood Plan will give you the power to choose the type, style and scale of development.

The Neighbourhood Plan is an important tool to influence the future of Blakeney.

BLAKENEY NEIGHBOURHOOD PLAN

Vision

Pointing Blakeney towards a future that reflects the needs of local residents, preserving its unique character and supporting a vibrant and sustainable community.

Aims

- To preserve the look and feel of the village.
- To support the provision of affordable housing and to balance the number of second homes with the housing needs of the local community so that Blakeney continues to be a place where people of all ages can live and work.

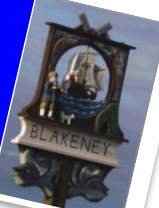
To give people with a connection to Blakeney priority for affordable homes.

To support and promote the development of new and existing local businesses and employment opportunities.

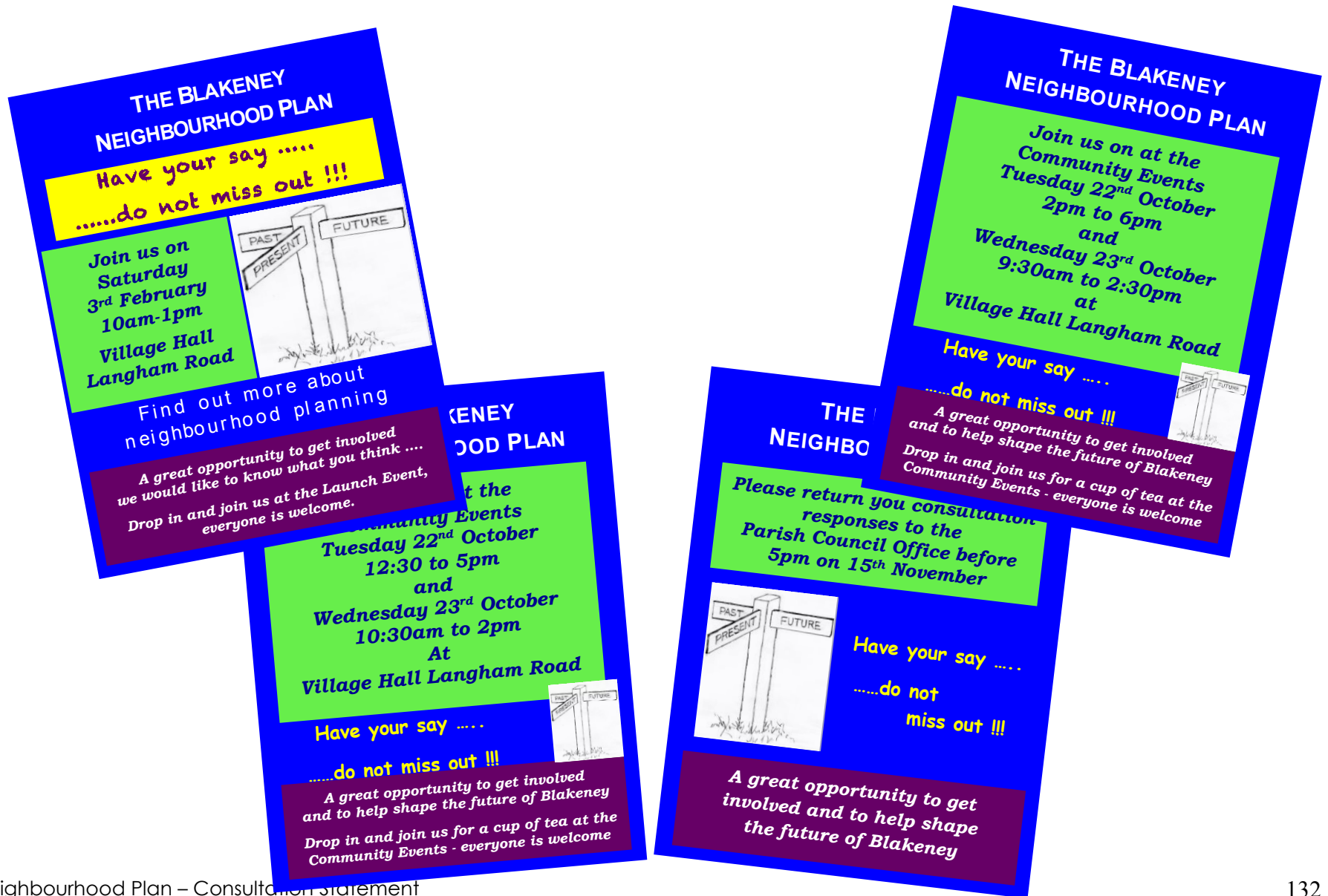
To protect green open spaces and footpaths within the village to promote well-being, preserve the local environment and protect wildlife.

To ensure any development is to the highest standards of design and navigable ports in Blakeney for leisure and commercial.

Make contact and find out more...
perk@blakeneyparishcouncil.co.uk
www.blakeneyparishcouncil.co.uk
 Event on 28th July and have your say



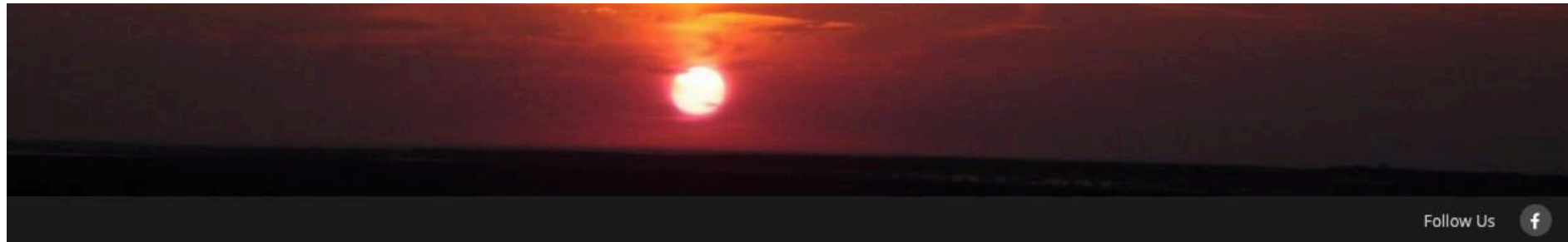
Neighbourhood Plan Posters



Appendix 11

Website

Blakeney Parish Council Website - Home Page



Blakeney Parish Council Pointing Blakeney Towards the Future

- Home
- News ▾
- Blakeney Village ▾
- Blakeney Parish Council ▾
- Neighbourhood Plan ▾
- Blakeney Dinghy Park ▾
- Privacy
- A&E
- Contact Us

Coronavirus

- Timeline
- Neighbourhood Plan Consultation
- Neighbourhood Plan Agendas
- Neighbourhood Plan Minutes



A selection of web pages relating to the Blakeney Neighbourhood Plan



Appendix 12

Gavan Valley Newsletter

The Glaven Valley Newsletter



The Glaven Valley Newsletter



Blakeney Neighbourhood Plan

Momentum is building as we move through the early stages in the production of the Blakeney Neighbourhood Plan. We were delighted so many of you completed and returned the questionnaires, giving us the input needed. The Vision and Aims have been drafted, the Vision is:

Pointing Blakeney towards a future that reflects the needs of local residents, preserving its unique character and supporting a vibrant and sustainable community.

And the seven Aims are

1. To preserve the look and feel of the village.
2. To support the provision of affordable housing and to balance the number of 'second' homes with the housing needs of the local community so that Blakeney continues to be a place where people of all ages can live and work.
3. To give people with a connection to Blakeney priority for affordable housing.
4. To support and promote the development of new and existing local businesses and employment opportunities.
5. To protect green open spaces and footpaths within the village to promote well-being, preserve the local environment and protect wildlife.
6. To make sure any development is of the highest standards of design and meets local needs.
7. To maintain a navigable port in Blakeney for leisure and commercial use.

We now need to ask for your help again in developing the topics and policies areas. Please come and '....have your say' at the next Community Consultation event on Saturday 28th July at the Village Hall 10am – 2pm, this is a chance to tell us what is important to you.

The Steering Group, made up of a number of local residents, meets regularly the next meeting on Monday 23rd July. Full details, minutes and agenda, can be found on the dedicated webpage on the Parish Council web site <http://www.blakeneyparishcouncil.co.uk>.

Date for the Diary....
Community Consultation Event: **Saturday 28th July 10-2pm** at the Village Hall

Get involved and have your say, tell us more about your views for Blakeney

Sam Curtis
Chairman, Blakeney Neighbourhood Plan Steering Group

**Launch Event for
The Blakeney Neighbourhood Plan
Saturday 3rd February 2018 in Blakeney Village Hall
from 10am til 1pm.**

Find out what it's all about!

Please do come along, take a look, ask questions & have your say. Once completed The Blakeney Neighbourhood Plan, will have an affect on you and the village you call home, or where you work or visit.

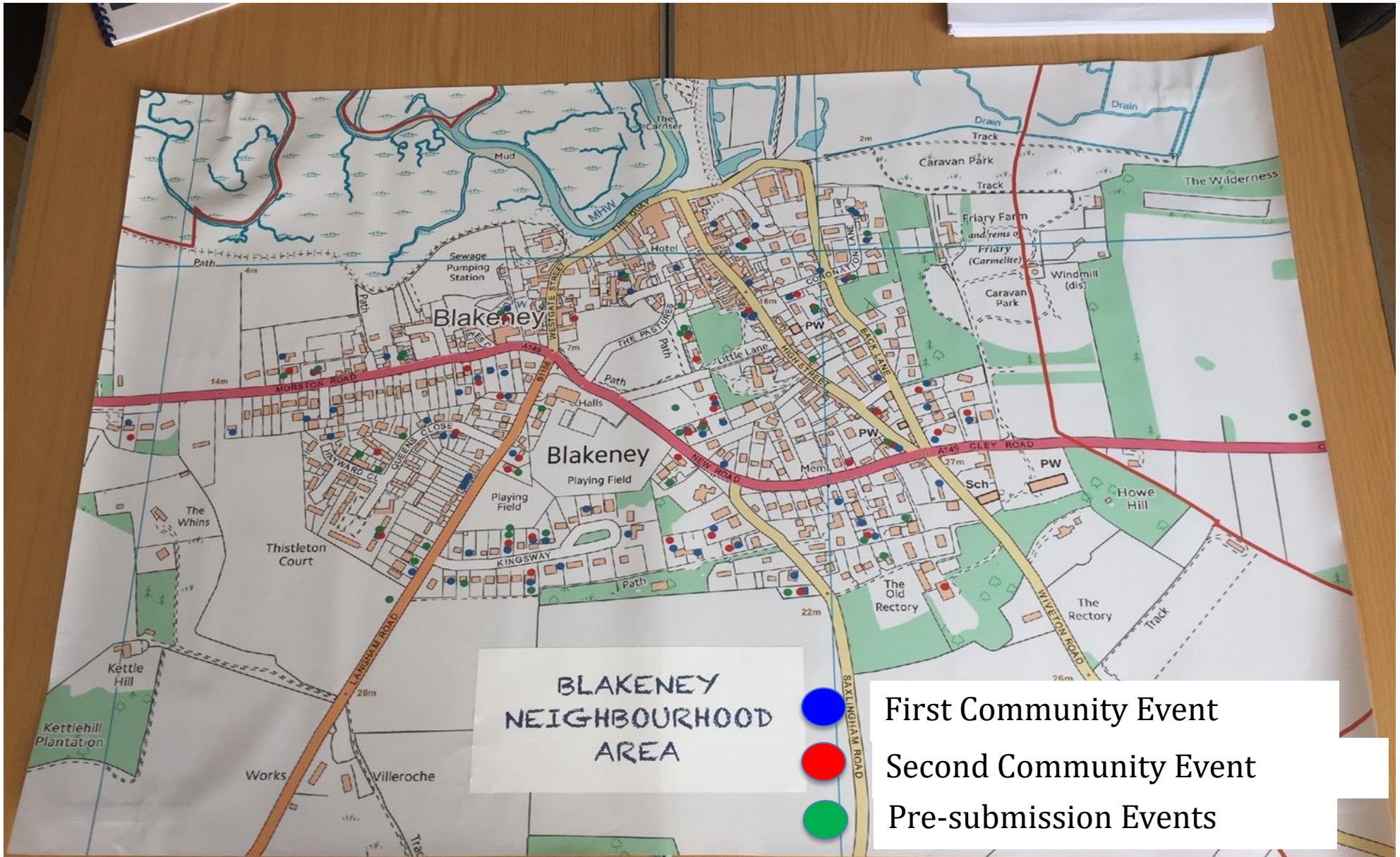
- Do you care about Blakeney?
- How would you like to see it change in the future?
- Where would you like to see future developments and why?
- Where would you not and why?
- What are your thoughts on things like; planning, affordable housing, second homes, business opportunities, infrastructure, open spaces, amenities for our residents etc, these are just some of the areas which will be part of the discussions going forward.
- Are you passionate about doing better in the future?

Be part of it and make a difference, have your say.
At the very least, come along and find out what it is all about.
Everyone welcome...

Appendix 13

'Dot Map'

The 'Dot Map' illustrating attendance at each consultation events.



Appendix 14

Pre-submission Consultation Responses

Blakeney Neighbourhood Development Plan

Pre-Submission Consultation Responses
 Results and Feedback
 Period: 3rd October – 15th November 2019

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
PS/1 Norfolk Constabulary		<p><u>Blakeney – Neighbourhood Plan – Response to Regulation 16 Consultation</u></p> <p>I refer to the above matter and the consultation.</p> <p>Norfolk Constabulary has the responsibility for policing making Norfolk a safe place where people want to live, work, travel and invest in.</p> <p>Central Government place great emphasis on the role of the Police. Furthermore National Planning Policy Framework (NPPF) gives significant weight to promoting safe communities (in section 8 of the NPPF). This is highlighted by the provision of paragraph 91 which states</p>	<p>Thank you for your response.</p> <p>The Pre-Submission Consultation is in fact the Regulation 14 Consultation. The Regulation 16 Consultation will be led by North Norfolk District Council once the Blakeney Neighbourhood Plan (BNHP) has been submitted by the Parish Council for independent examination.</p> <p>Comment noted.</p> <p>Comment noted and hence the BNHP seeks to promote safety and security as part of good design in Policy 6.</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
	Policy 6	<p><i>Planning policies and decisions should aim to achieve healthy, inclusive and safe places which.....</i></p> <p><i>b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas;</i></p> <p>Nationally the Police have sought to provide advice and guidelines to support and create safer communities, most notably reflected in their Secured By Design initiative which seek to improve the security of buildings and their immediate surroundings to provide safe places to live.</p> <p>In terms of creating and maintaining safer communities, there are a number of measures that should be included in the Neighbourhood Plan to ensure that it satisfactorily addresses NPPF provisions and the needs of the Neighbourhood Plan area.</p> <p>1. The Neighbourhood Plan should include the specific objective to '<i>create and maintain a safer community and reduce crime and disorder</i>'.</p>	<p>Policy 6, criteria 10, requires new development to incorporate the crime prevention principles contained within Secure by Design guidance document.</p> <p>Comment noted and it is appreciated that in many instances it is easier at the design stage to relatively simply incorporate good practice to enhance design and prevent crime.</p> <p>Comment noted and your document has been referenced in Policy 6 to enhance good design.</p> <p>Comment noted.</p> <p>Comment noted and Policy 6 seeks to enhance the safety and security of residents. Object 6 – “To make sure any development is of the highest standards of design..... ” while not explicitly stated does see community safety and reduction in crime as part of the principles of ‘highest standards of design’.</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
		<p>2. The Neighbourhood Plan should clearly support the principles of crime prevention through good design as the design and layout of the built environment plays an important role in designing out crime and reducing the opportunities for anti-social behaviour. The Neighbourhood Plan should include a policy that <i>'All new developments should conform to the 'Secured by Design' principles and the Neighbourhood Plan will support development proposals aimed at improving community safety'</i>. This would be supported by the objective to <i>'create and maintain a safer community and reduce crime and disorder'</i>.</p> <p>3. The Neighbourhood Plan should include clear reference to the use of developer contributions and / or CIL monies to deliver local initiatives that create safer communities (and reduce crime). This should include measures identified by Norfolk Constabulary, along with County and District Council's infrastructure studies and infrastructure delivery plans, to contribute to the finance of police / bluelight infrastructure (including premises, vehicles, operational equipment and communication equipment).</p> <p>I trust that these elements will be incorporated into Neighbourhood Plan objectives and policies to reduce the opportunities for crime and disorder (and also help reduce the fear of crime in the Neighbourhood Plan area) to ensure that the Plan is consistent with the emphasis that Government places on creating safer communities.</p>	<p>Comment noted and Policy 6, criteria 10, does require the principles of 'Secure by Design' to be included.</p> <p>Comment noted. North Norfolk District Council does not currently operate a CIL levy, although does require development to contribute to key infrastructure requirements – such as 'bluelight'; -</p> <p>Comments noted. Designing in measures that create safer communities through crime prevention, improving resident safety and reducing the fear of crime are principles that are included within the policies of the Blakeney Neighbourhood Plan.</p> <p>Proposed action:- Comments noted and no changes to the BNHP are proposed.</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
<p>PS/2 Blakeney Resident</p>		<p>I have read through the most recent pre-submission version of the Neighbourhood Plan and would like to say, Well Done, to all those who managed to stay the Course.</p>	<p>Thank you for your support.</p> <p>Proposed action:- Comments noted and no changes to the BNHP are proposed.</p>
<p>PS/3 Blakeney Resident</p>		<p>Agree with all 17 Policies.</p> <p>Disagree with none of the Policies.</p> <p>Overall agree with the Neighbourhood Plan.</p> <p>Firstly, it was good to meet you last Wednesday at the BNP road show in the village Hall.</p> <p>Secondly, I should like to congratulate the BNP Committee for putting together a very comprehensive and fair Draft Plan. There is a lot of info contained within which makes interesting reading.</p> <p>I append my BNP response form and, as I mentioned to you, I am concerned that, in the absence of a balancing comment regarding NNDC's Preferred Site BLA04 in the Draft Local Plan 2016-36, this could then suggest that the BNP Committee silently endorses the NNDC choice of site.</p> <p>I would not like to see that the Final BNP going to NNDC apparently endorsing BLA04 especially as the Parish Council chose not to express an opinion on BLA04 either way during the Local Plan consultation.</p>	<p>Thank you for your support. Your comments are noted.</p> <p>Comment noted, it was good to talk through the Neighbourhood Plan with you.</p> <p>Comment noted and thank you for taking the time to read through what is a large document.</p> <p>Comment noted, additional text will be added to make it clear that Site BLA04 is NNDC's choice of site and their preference for development of the sites that came forward.</p> <p>Comment noted and additional text will be added to the section on the emerging Local Plan and NNDC's preference of sites.</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
	Policy 2	<p>As you know might know, there have been two landscape consultants reports that point out in "Planning Speak" exactly why the BLA04 is absolutely the wrong choice and BLA01 should be the optimum choice for the next phase of housing development in Blakeney. I did provide your Chairman with a copy of the Axis Consultancy report and had hoped that some notice would have been taken of its conclusions within the Draft BNP. Oddfellows in their Consultation response have provided NNDC with a copy of their consultants landscape impact study which is very critical of BLA04, and supports BLA01.</p> <p>I look forward to hearing from you in due course whether your Committee can redress the lack of balance regarding BLA04.</p> <p>Yes. BUT, 6.62 is unclear – does this relate to an existing home (say built 10 years ago) which needs to be sold on the open market if say the owner dies? Or, does it relate to 6.64 as a newly built home with planning restrictions as amended by 6.65. I can't see how you can force the estate of a say deceased person to sell at an artificial "locally affordable " price let alone at that less 20% - why the discount anyway?</p> <p>Yes.</p>	<p>Comments noted. NNDC will take account of the reports and other comments received on their Regulation 18 consultation on the emerging Local Plan and make a decision on the suitability of Site BLA04 against the alternatives, including Site BLA01.</p> <p>Additional text will be added to recognise that some local residents have proposed alternative sites and provided additional information to the District who will consider as part of their process.</p> <p>Comments noted. This does refer to new homes that have been granted planning permission and will have the Principal Residence condition applied, as per paragraph 6.65 that will include the discounting as outlined in 6.62. It has been decided to remove this requirement, therefore, this paragraph will be deleted.</p> <p>Applying the 'discount market rate' of 20% is the minimum level of reduction to achieve the 'affordable' definition, as defined by Government in the National Planning Policy Framework. As part of the policy ambition the objective is to seek ways to make homes more affordable.</p>

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		<p>planning consultancies have panned NNDC preference for BLA04 over BLA01 particularly on the environmental and landscape impact, and heritage view protection that the BNP espouses (as stated in the August 2019 Blakeney Conservation Plan). I realise that the BNP may not be willing to openly support an alternative to BLA04 (and am disappointed that they have taken this stance), but a balancing statement not overtly supporting BLA04 is really necessary.</p>	<p>have received and the sustainability assessment, to evaluate which, if any, sites in Blakeney are suitable for allocation for development.</p> <p>As per your earlier comments, additional text will be added to this section to make it clear that the choice being proposed, and the preference suggested is that of North Norfolk District Council.</p> <p>Proposed action:- Comments noted and the following changes to the BNHP will be made:-</p> <p>Paragraph 5.31: Add the following text - “this is North Norfolk District Council’s choice of the site that came forward and their preference for further residential development. However, alternative sites have been proposed, some local residents have specifically supported BLA1, and the District will consider these and include them in their future consultation.”</p> <p>Paragraph 6.62: Delete.</p>
<p>PS/4 Blakeney Resident</p>	<p>Policy 1</p> <p>Policy 4</p>	<p>Agree with Policies 1, 2, 3, 5, 6, 7, 8, 9,10, 11, 12, 13, 14, 15, 16 and 17.</p> <p>Disagree with Policy 4.</p> <p>Overall agree with the Neighbourhood Plan.</p> <p>Yes. No holiday homes / second homes.</p> <p>No.</p>	<p>Thank you for your support and response.</p> <p>Comment noted.</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
	Overall	<p>Do not want to lose holiday lets as they bring money into the village.</p> <p>Top marks 100%</p>	<p>Comment noted, the income generated for the local economy is so important. Policy 4 does not seek to stop this, instead it is looking to reduce the number of second homes by applying the Principle Residency condition in the few occasions where holiday lets are changed to residential accommodation.</p> <p>Support noted and thank you.</p> <p>Proposed action:- Comments noted and no changes to the BNHP are proposed.</p>
<p>PS/5 Blakeney Resident</p>	<p>Policy 2</p> <p>Policy 3</p> <p>Policy 4</p> <p>Policy 5</p> <p>Policy 6</p>	<p>Agree with all 17 Policies.</p> <p>Disagree with none of the Policies.</p> <p>Overall agree with the Neighbourhood Plan.</p> <p>Yes. Very necessary.</p> <p>Yes. Hope that can be achieved.</p> <p>Yes. Hope that can be achieved.</p> <p>Yes. All excellent proposals.</p> <p>Yes. All excellent proposals.</p>	<p>Thank you for your support.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted.</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
	Policy 7 Policy 11 Policy 12 Policy 13 Policy 14 Overall	Yes. All excellent proposals. Yes. Again all excellent proposals. Yes. Again all excellent proposals. Yes. Again all excellent proposals. Yes. Again all excellent proposals. I think all the proposals are excellent and hope all are achievable.	Comment noted. Comment noted. Comment noted. Comment noted. Comment noted. Support noted and thank you. Proposed action:- Comments noted and no changes to the BNHP are proposed.
PS/6 Blakeney Resident		Agree with all 17 Policies. Disagree with none of the Policies. Overall agree with the Neighbourhood Plan.	Thank you for your support. Your support is appreciated. Proposed action:- Comments noted and no changes to the BNHP are proposed.
PS/7 Blakeney Resident		Agree with all 17 Policies. Disagree with none of the Policies. Overall agree with the Neighbourhood Plan.	Thank you for your support.

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
	<p>Policy 2</p> <p>Policy 5</p>	<p>Yes. Greatly agree with this!</p> <p>Yes. Wish to know that Policy 5(3) would prevent an extension / particularly <u>upper</u> extensions totally out of line within a line of houses considered part of the old Blakeney (built [terraced] in 1825 cobble / flint) – Possibly being considered adversely in Morston Rd by new owner.</p>	<p>Comment noted.</p> <p>Comment noted. Without knowing the details it is not possible to say one way or the other specifically in relation to Policy 5, criteria 3. Once the Neighbourhood Plan is adopted ('made') then all of the policies would need to be considered and the requirements met within the development proposals you have described.</p> <p>Proposed action:- Comments noted and no changes to the BNHP are proposed.</p>
<p>PS/8 Blakeney Resident</p>	<p>Policy 2</p> <p>Policy 8</p>	<p>Agree with Policies 1, 3, 4, 5, 6, 7 and 9.</p> <p>Disagree with Policies 2, 8 and 10.</p> <p>No indication given on Policies 11, 12, 13, 14, 15, 16 and 17.</p> <p>No. Difficult to enforce.</p> <p>No. Outward extension of the village may be required in the future to deliver exception housing schemes for local people.</p>	<p>Thank you for your response.</p> <p>Comment noted. Second home ownership is a difficult and at times a divisive subject. The Principal Residence condition has been successfully applied in other villages, through their Neighbourhood Plans, and do not see why that should be any different for Blakeney.</p> <p>Comment noted. Our expectation of 'infill' is that in most instances it will be within the current settlement</p>

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	Policy 10	<p>No</p> <p>Developers lack the power to require Anglian Water to upgrade foul sewerage provision prior to completing their development.</p>	<p>boundary and would not prevent exception sites for affordable homes coming forward.</p> <p>Comment noted. Planning permission for new development should only be granted where Anglian Water have agreed there is or they will provide capacity. Anglian Water as the statutory body, in our area, is responsible for the provision and accountable to ensure capacity is available to meet the agreed need.</p> <p>Proposed action:- Comments noted and no changes to the BNHP are proposed.</p>
<p>PS/9 Cley Resident</p>	<p>Policy 9</p> <p>Policy 12</p>	<p>Agree with Policies 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15, 16 and 17.</p> <p>Disagree with none of the Policies.</p> <p>Did not state whether agreed or disagreed with Policy 12.</p> <p>Overall agree with the Neighbourhood Plan.</p> <p>Yes. With regard that replacement dwellings are usually far more expensive when sold on than the original.</p> <p>Reduction in street lighting should be considered. Crime is very low.</p>	<p>Thank you for your response and support.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Proposed action:- Comments noted and no changes to the BNHP are proposed.</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
PS/10 Blakeney Resident	<p>Policy 12</p> <p>Policy 14</p> <p>Policy 17</p> <p>Overall</p>	<p>Agree with Policies 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 16 and 17.</p> <p>Disagree with none of the Policies.</p> <p>Did not state whether agreed or disagreed with Policies 13 and 15.</p> <p>Overall agree with the Neighbourhood Plan.</p> <p>Yes. Definitely dark skies.</p> <p>Yes. A risk if an effective transition to LA ownership?</p> <p>Yes. The traffic noise and pollution will become an increasing problem.</p> <p>The future of the traffic congestion + road planning must be dealt with.</p>	<p>Thank you for your response and comments.</p> <p>Support noted.</p> <p>Comment noted, although should not be a risk as North Norfolk District Council will ensure they receive funding to cover initial maintenance and management costs.</p> <p>Comment noted. Your concern is shared and this is why a full Traffic Impact Analysis has been included within Community Projects and Actions (7.2) to seek an holistic view to recognise the strategic pressure points and come up with options and possible solutions.</p> <p>Comment note, please see response above to Policy 17.</p> <p>Proposed action:- Comments noted and no changes to the BNHP are proposed.</p>
PS/11		Agree with all 17 Policies.	Thank you for your support.

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Blakeney Resident	Policy 13	<p>Disagree with none of the Policies.</p> <p>Overall agree with the Neighbourhood Plan.</p> <p>No.10 Check land back to footpath !</p>	<p>Comment noted.</p> <p>Proposed action:- Comments noted and no changes to the BNHP are proposed.</p>
PS/12 Blakeney Resident	<p>Policy 8</p> <p>Policy 13</p> <p>Overall</p>	<p>Agree with Policies 1, 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14, 15, 16 and 17.</p> <p>Disagree with none of the Policies.</p> <p>Did not state whether agreed or disagreed with Policy 8.</p> <p>Overall agree with the Neighbourhood Plan.</p> <p>No infill</p> <p>Yes. No.10 in Blakeney Neighbourhood Plan North Granary. Make sure path goes back to original status.</p> <p>Yes. Keep open all public footpaths and open spaces.</p>	<p>Thank you for your support.</p> <p>Comment noted, although it is not possible to just ban infill – as temping as that may be.</p> <p>Comment noted.</p> <p>Comments noted. Footpaths and open spaces are seen as fundamental in supporting and encouraging healthy lifestyles, as well as, open spaces being important to retain the character and village feel.</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
			Proposed action:- Comments noted and no changes to the BNHP are proposed.
PS/13 Blakeney Resident		<p>Agree with all 17 Policies.</p> <p>Disagree with none of the Policies.</p> <p>Overall agree with the Neighbourhood Plan.</p>	<p>Thank you for your support.</p> <p>Proposed action:- Comments noted and no changes to the BNHP are proposed.</p>
PS/14 Blakeney Resident	<p>Policy 2</p> <p>Policy 3</p> <p>Policy 4</p> <p>Policy 8</p>	<p>Agree with Policies 1, 2, 5, 6, 7, 8, 10, 11, 12, 13, 14, 15, 16 and 17.</p> <p>Disagree with Policies 3, 4, and 9.</p> <p>Overall agree with the Neighbourhood Plan.</p> <p>Yes. What happens when the new property is sold on?</p> <p>No. Can't see how this can be enforced at point of sale.</p> <p>No. Can't see how this can be enforced at point of sale.</p> <p>Yes.</p>	<p>Thank you for your response.</p> <p>Comment noted. When a property is sold the Principal Residence condition remains on / with the property and the new owners will have to meet its requirements or will not be able to purchase the property.</p> <p>Comment noted. The enforcement is through the planning system with the granting or not of the permission to change use rather than at the point of sale.</p> <p>Comment noted. As per response above to Policy 3, this is a planning matter and enforced through the planning system.</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
	Policy 9	<p>Consider width of lorries and size of modern cars which can't necessarily get down them & would therefore increase street parking.</p> <p>No. Feel development rights should be restricted depending on location rather than always removed.</p>	<p>Comment noted. Impact on the highway, parking and access are all material considerations when a planning application is determined.</p> <p>Comment noted. That is the normal approach. Replacement dwellings are a big and contentious issue where many dwellings have been replaced but then been extended under permitted development rights in ways that would have been unlikely to have received planning permission.</p> <p>Therefore, by removing permitted development rights does not stop owners being able to apply for planning permission and, following due assessment and scrutiny, appropriate development will be determined, and permission granted. While, inappropriate development will be prevented.</p> <p>Proposed action:- Comments noted and no changes to the BNHP are proposed.</p>
<p>PS/15 Cley Resident</p>		<p>Agree with all 17 Policies.</p> <p>Disagree with none of the Policies.</p> <p>Overall agree with the Neighbourhood Plan.</p>	<p>Thank you for your response and support.</p> <p>Proposed action:- Comments noted and no changes to the BNHP are proposed.</p>
<p>PS/16 Blakeney Resident</p>		<p>Agree with Policies 1, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16 and 17.</p> <p>Disagree with Policies 2, 3, 4 and 5.</p>	<p>Thank you for your response.</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
	Overall	But more thought should be given into improving traffic flow within the village.	<p>Comment noted. The way traffic moves around Blakeney and its narrow streets has been subject to much debate by residents, although little consensus on a solution. Therefore, it has been felt the best approach is to undertake, subject to funding, a full Traffic Impact Analysis. This has been included within Community Projects and Actions (7.2) to seek an holistic view, to recognise the strategic pressure points, to come up with options and possible solutions.</p> <p>Proposed action:- Comments noted and no changes to the BNHP are proposed.</p>
PS/17 Blakeney Resident	Policy 9	<p>Agree with Policies 1, 2, 3, 4, 5, 10, 12, 13, 14, 15, 16 and 17.</p> <p>Disagree with none of the Policies.</p> <p>Did not state whether agreed or disagreed with Policies 6, 7, 8, 9 and 11.</p> <p>Overall agree with the Neighbourhood Plan.</p> <p>Depending on the new build – it could be an advantage rather than a negative</p>	<p>Thank you for your response.</p> <p>Comment noted.</p> <p>Replacement dwellings are a contentious issue where many dwellings have been replaced but then been extended in ways that may have been unlikely to have received planning permission initially if included in the original proposals. Local residents feel these changes have had negative impacts.</p> <p>As you have identified this policy can have a very positive affect with appropriate development being</p>

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		<p>BLA04/A – Broadland + BNHS</p> <p>Traffic a problem summer months</p> <p>Extra parking</p>	<p>supported and approved, while preventing inappropriate development.</p> <p>Comment noted. Blakeney Neighbourhood Housing Society (BNHS) and Broadland Housing are both active in seeking more homes in Blakeney that are affordable to rent and for local people. Policy 1 is key to seeing homes in Blakeney being made available to local people first.</p> <p>Comments noted. Your concern is shared and this is why a full Traffic Impact Analysis has been included within Community Projects and Actions (7.2.) to seek an holistic view to recognise the strategic pressure points and come up with options and possible solutions, including sessional traffic problems and the need for extra parking.</p> <p>Proposed action:- Comments noted and no changes to the BNHP are proposed.</p>
<p>PS/18 Natural England</p>		<p>Thank you for your consultation on the above dated 03 October 2019.</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>Thank you for your response.</p>

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		<p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England does not have any specific comments on this draft neighbourhood plan.</p> <p>However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.</p> <p>For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.</p> <p>Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities</p> <p>Natural environment information sources</p> <p>The Magic website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones). Local</p>	<p>Comment noted. Natural England is already on our stakeholder list and has been informed directly of activities and been consulted with on key elements and stages.</p> <p>Comment noted. Thank you for reviewing the Blakeney Neighbourhood Plan and its policies and confirming you have no areas of concern in their application that required you to make specific comments.</p> <p>Comment note. Thank you for highlighting the resources available.</p> <p>Comments noted. North Norfolk District Council have supported the production of the Neighbourhood Plan and produced the maps on request for inclusion.</p>

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		<p>environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available here. http://www.nbn-nfbr.org.uk/nfbr.php</p> <p>Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found here. http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx</p> <p>Most of these will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.</p> <p>National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found here. https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making</p> <p>There may also be a local landscape character assessment covering your area. This is a tool to help understand the character and local distinctiveness</p>	<p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted. There is the North Norfolk Landscape Character Assessment and the Norfolk Coast Partnership Landscape Character Assessment</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
		<p>of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.</p> <p>If your neighbourhood planning area is within or adjacent to a National Park or Area of Outstanding Natural Beauty (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.</p> <p>General mapped information on soil types and Agricultural Land Classification is available (under 'landscape') on the Magic website and also from the LandIS website, which contains more information about obtaining soil data.</p> <p>Natural environment issues to consider</p> <p>The National Planning Policy Framework sets out national planning policy on protecting and enhancing the natural environment. Planning Practice Guidance sets out supporting guidance.</p> <p>Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.</p> <p><u>Landscape</u></p>	<p>for the AONB – both documents give a great deal of detail on the landscape character.</p> <p>Comment noted. A large part of Blakeney is within an Area of Outstanding Natural Beauty (AONB). The Norfolk Coast Partnership Landscape Character Assessment for the AONB has provided useful information.</p> <p>Comment noted.</p> <p>Comment noted. North Norfolk District Council have been very supportive in the development of the Blakeney Neighbourhood Plan.</p>

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		<p>Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.</p> <p>If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.</p> <p><u>Wildlife habitats</u> Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed here), such as Sites of Special Scientific Interest or Ancient woodland. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.</p> <p><u>Priority and protected species</u> You'll also want to consider whether any proposals might affect priority species (listed here) or protected species. To help you do this, Natural England has produced advice here to help</p>	<p>Comment noted. A number of the policies in the Blakeney Neighbourhood Plan seek to preserve or enhance the landscape of the village and surrounding countryside and coastline.</p> <p>Comments noted. The Blakeney Neighbourhood Plan does not propose any additional sites for development.</p> <p>Comments noted. Policy 11 seeks for preserve and enhance biodiversity in Blakeney.</p> <p>Comment noted.</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
		<p>understand the impact of particular developments on protected species.</p> <p><u>Best and Most Versatile Agricultural Land</u> Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 171. For more information, see our publication Agricultural Land Classification: protecting the best and most versatile agricultural land.</p> <p>Improving your natural environment</p> <p>Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:</p> <ul style="list-style-type: none"> • Providing a new footpath through the new development to link into existing rights of way. • Restoring a neglected hedgerow. • Creating a new pond as an attractive feature on the site. 	<p>Comments noted. Listed below is where the policies in the Blakeney Neighbourhood Plan are seeking to achieve your suggested outcomes.</p> <p>Policy 11.</p> <p>Policy 6, criteria 7 – retaining existing hedgerows.</p> <p>Policy 13 -seeks to protect the existing duck pond.</p> <p>Policy 6, criteria 7 – retaining existing trees.</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
		<ul style="list-style-type: none"> • Planting trees characteristic to the local area to make a positive contribution to the local landscape. • Using native plants in landscaping schemes for better nectar and seed sources for bees and birds. • Incorporating swift boxes or bat boxes into the design of new buildings. • Think about how lighting can be best managed to encourage wildlife. • Adding a green roof to new buildings. <p>You may also want to consider enhancing your local area in other ways, for example by:</p> <ul style="list-style-type: none"> • Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community. • Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. • Identifying green areas of particular importance for special protection through Local Green Space designation (see Planning Practice Guidance on this). • Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild 	<p>Policy 11 – biodiversity gain.</p> <p>Policy 12 – reducing light pollution and preserving dark skies.</p> <p>Policy 14 – ensuring management, maintenance and funding arrangements are in place for open space.</p> <p>Policy 13 – key areas of open green space are identified although the Local Green Space designation is not sought.</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
		<p>flower strips in less used parts of parks, changing hedge cutting timings and frequency).</p> <ul style="list-style-type: none"> • Planting additional street trees. • Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links. • Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore). 	<p>Policy 11 – biodiversity gain. Policy 14 – management and maintenance.</p> <p>Policy 6 – ensuring new development is integrated with existing homes.</p> <p>Proposed action:- Comments noted and no changes to the BNHP are proposed.</p>
<p>PS/19 Blakeney Resident</p>	<p>Policy 1</p>	<p>Agree with none of the Policies.</p> <p>Disagree with all 17 of the Policies.</p> <p>Overall disagree with the Neighbourhood Plan.</p> <p>No. I fully support the objective of the provision of more affordable housing within Blakeney. However, I would have thought we need a robust assessment of need within Blakeney before any policy giving local households priority allocation could apply.</p>	<p>Thank you for your response.</p> <p>Comment noted. In October 2018 North Norfolk District Council (NNDC) identified 706 on their housing list wishing to live in Blakeney, of these, 79 were identified as having a local connection – current home, former home, work place and/or close family – using the NNDC housing list is seen as an acceptable method to assess need. Albeit, a snapshot at that specific time but one that can be re-run easily and accurately at any time.</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
	Policy 2	<p>I doubt whether the allocations policy for affordable housing by NNDC is within the remit of the Blakeney Neighbourhood Plan.</p> <p>No. I believe the implementation of this type of policy will be extremely difficult, if not impossible.</p>	<p>A large number of Neighbourhood Plans have policies that give local people the opportunity to access affordable housing.</p>
	Policy 3	<p>No. I don't think I would need planning permission if I decided to rent my house out for holiday purposes. Therefore, this policy is of questionable value.</p>	<p>Comment Noted. A number of Neighbourhood Plans, where second home ownership is a key issue, have included and successfully implemented such a policy to restrict second home ownership.</p>
	Policy 4	<p>No. The likelihood of anyone applying for this type of planning permission seems extremely remote, therefore, the policy does not appear to have any worth.</p>	<p>Comment noted. Planning permission would be required should you wish to have your house recognised as holiday accommodation and pay business rates rather than council tax.</p> <p>In some instances, people do this to enable them to claim small business rate relief and not pay any business rates.</p>
	Policy 5	<p>No. How is it proposed to identify holiday accommodation in order to impose additional restrictions on it? Would this be just?</p>	<p>Comment noted. In seeking to increase the number of principal residences in Blakeney, where this does happen, this policy will ensure that residential homes will be available for permanent occupation rather than second homes.</p>
	Policy 6	<p>No. It strikes me that this is already in the draft Local Plan. As an example of the questionable value of this</p>	<p>Comment noted. Holiday accommodation is identified by NNDC through use classes as sui generis and pays business rates. It is felt as 'just' that such extensions should not have a detrimental impact – such as on-street parking.</p> <p>Comments noted, although these criteria for improving design are not covered by the Local Plan.</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
		<p>objectives. The principal reason for this is that the policy accepts external lighting providing that it is “for safety and/or security reasons”. It will always be possible for applicants to argue that lighting is necessary for safety reasons so I believe that, for this reason, it will be ineffective.</p> <p>I would suggest that this policy could be significantly improved by drawing on the wording frequently submitted in response to planning applications by Norfolk Coast Partnership which recommends that any outdoor lights should be:</p> <ol style="list-style-type: none"> 1) fully shielded (enclosed in full cut-off flat glass fitments) 2) directed downwards (mounted horizontally to the ground and not tilted upwards) 3) switched on only when needed (no dusk to dawn lamps) 4) white light low-energy lamps (LED, metal halide or fluorescent) and not orange or pink sodium sources. <p>I would also add the following conditions:</p> <ol style="list-style-type: none"> 5) The illumination of buildings themselves is not acceptable as this causes reflected light pollution. 6) Lights to be sited as low as possible such that they avoid light spillage off the property. 7) Lights to be of the lowest level of brightness required in order to minimise reflected light and use less power. <p>The Norfolk Coast Partnership also refers to the Institute of Lighting Professionals, Guidance Notes for the Reduction of Obtrusive Lights which gives guidance for lighting in an AONB.</p>	<p>The exception will be public highways where the safety requirement would be stipulated by NCC Highways Authority.</p> <p>Comment noted. Policy 6, criteria 11 includes most of these details, although is less prescriptive it does list the following elements - <i>‘incorporate modern technologies, motion sensors, softer down lighting and timers to restrict operating hours’</i>- this allows the requirements to adjust as technologies change and improve over the next 20 years.</p> <p>The specific details will be added to Policy 6.</p> <p>Comments noted. While these criteria are seen as well meaning they would be difficult to establish exact criteria or specification. Will add to supporting text as areas of encouragement.</p> <p>Comment noted. The reference suggested will be added to aid and guide those wishing to include lighting with their development proposals.</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
	Policy 13	<p>I note that policy 12 seeks to discourage light pollution through large windows and sky lights: I would suggest this source of light pollution comes a distant second to exterior lighting which reflects widely and is likely to be left on for much of the night.</p> <p>I would also add that Blakeney could make a significant reduction to existing light pollution by:</p> <ul style="list-style-type: none"> - upgrading the street lights (if we are going to have them) to modern, shielded lights; - turning off the street lights at, say, midnight rather than leaving them to burn until dawn; - improving the design of the flood lights on the tennis courts to reduce the light spillage upwards and outwards away from the courts; - removing the, very recently installed, shocking lights on the public toilets on the Quay; - removing (or upgrading with a modern alternative) the sodium light in the Village Hall car park. <p>I recognise the need to protect areas which are special to the community within the village but I make the following points on Policy 13:</p> <p>It is not possible to confidently identify some of the spaces (and their boundaries) listed in this policy as no map is provided.</p> <p>Paragraph 6.239 of the draft neighbourhood plan notes that the policy “is not seeking ‘Local Green Space’ designation”. Having read guidance on neighbourhood plans provided by Locality and the NPPF paragraphs 99 and 100 it is clear that neighbourhood plans can protect certain open</p>	<p>Comment noted. External lighting is of a greater issue although the use of internal lighting can also spoil the skyline and affect the dark skies.</p> <p>Comments noted. Will be added to the Community Projects and Actions list.</p> <p>Comments noted. A map of the specific areas identified in Policy 13 will be added.</p> <p>Comment noted. The protection Policy 13 brings to each of these open spaces is not the same as ‘Local Green Space’ designation.</p> <p>The Steering Group decided not to seek Local Green Space designation for these areas as many are in private ownership and at this time it is not possible to know how to be capable of enduring beyond the end of the plan period – a requirement of the NPPF in the designation of Local Green Space.</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
	<p data-bbox="398 879 517 911">Policy 14</p> <p data-bbox="398 1177 517 1209">Policy 15</p>	<p data-bbox="604 256 1276 480">spaces by designating them as Local Green Spaces. Policy 13 proposes to designate a selection of open areas and grants them a similar level of protection to Local Green Space but without the high bar of justification which is required for Local Green Space designation. I believe, therefore, that this policy is not in accord with the NPPF.</p> <p data-bbox="604 520 1276 807">I disagree with the inclusion of my property (39 New Road) within this designation because the justification put forward does not warrant its inclusion. I'm aware that a couple of members of the steering group (the chairman and one of the parish councillors) currently enjoy views from their homes towards the sea over my garden... I'm sure this can't be the reason for its inclusion as an open space!!! Could it??!!</p> <p data-bbox="604 882 1276 1042">No. Policy 14 seems fine except that there is no new development considered in the neighbourhood plan which could lead to the establishment of these new green spaces to which this policy would apply.</p> <p data-bbox="604 1177 1276 1273">No. I can't understand what benefits this policy would provide over the existing and draft local policies.</p>	<p data-bbox="1330 256 2002 320">Some of these open spaces are not 'green', but are seen as important open space within the village.</p> <p data-bbox="1330 520 2002 679">Comments noted. The inclusion of this area has been identified as meeting two of the three reasons for being important to Blakeney. Firstly, historic and secondly, strategic – as defined in paragraphs 6.253 and 6.255 of the Blakeney Neighbourhood Plan.</p> <p data-bbox="1330 719 2002 847">Being part of the open space located at the heart of the village and within the Conservation Area it is felt important that this open space should be preserved.</p> <p data-bbox="1330 919 2002 1015">Comment noted. The emerging Local Plan is likely to allocate a site for development that should include recreational space.</p> <p data-bbox="1330 1046 2002 1174">In addition, new proposals are starting to come forward for further affordable development that could also have a requirement to provide recreational space.</p> <p data-bbox="1330 1206 2002 1398">Comment noted. Policy 15 relates specifically to protecting existing and supporting additional employment and home-working in Blakeney, while being subject to meeting a criteria that is also specific to Blakeney - rather than the District wide policy in the existing Core Strategy or the policies</p>

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	Policy 16	<p>No. I don't think this policy adds anything which is not already covered in other neighbourhood plan policies or in the local plan.</p>	<p>than may come forward as part of the emerging Local Plan.</p> <p>Comment noted. Policy 16 is specifically aimed at the support of the retention of commercial premises in Blakeney – not covered by other policies in the Blakeney Neighbourhood Plan, Core Strategy or emerging Local Plan.</p>
	Policy 17	<p>No. Drawing on the points raised in this policy, I would suggest that the village should be looking at the provision of parking further away from the Quay and reducing the available parking at the Quay - possibly limited to disabled parking and electric vehicles at this stage? This would help to reduce the impact of traffic on the village (another major area of concern raised in consultation) and would encourage walking and cycling and would make the whole Quay area much more attractive. If someone came up with the fresh idea of turning the Carnser area into a car park today, I don't think it would be supported!</p>	<p>Comment noted. This suggestion did not come up through the previous community events and has previously been suggested to the National Trust, as the landowner.</p>
	Overall	<p>No.</p> <p>Omissions The following subjects, many of which were raised at the consultations, do not seem to have been addressed in the draft plan:</p> <ul style="list-style-type: none"> - How the subject of potential exception sites for local affordable housing should be progressed. 	<p>It is noted that you do not support the Blakeney Neighbourhood Plan.</p> <p>Comment noted.</p> <p>It was decided by the Steering Group not to seek to allocate sites for additional homes in the Blakeney Neighbourhood Plan. The Parish Council is working</p>

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		<ul style="list-style-type: none"> - No mention is made of the proposal for affordable housing on Langham Road. - The siting of market housing and associated affordable housing is not mentioned. (It seems somewhat odd that the Neighbourhood Plan is not putting forward a view or even consulting on where development takes place). - Traffic calming measures through the village on the Coast Road. - Tourism: I find it very strange that the main stay of the village receives so little attention in the draft Neighbourhood Plan. Surely this is an area which is likely to have a very substantial impact on Blakeney over the next 20 years? - Annexes to residential housing to provide holiday accommodation: this subject is frequently addressed by the Parish Council which consistently objects to annexes for the provision of holiday accommodation and, therefore, I am surprised that this matter has not been mentioned at all in the draft Neighbourhood Plan. I would add that I am, in general, not against this type of development as it provides income and employment to residents and, by definition, ensures a mix of full-time residents and visitors. 	<p>with a number of bodies to bring forward proposals for affordable homes.</p> <p>As per comment above, the Parish Council are working on this.</p> <p>As per earlier comment above, the Blakeney Neighbourhood Plan is not seeking to allocate sites for market and affordable homes.</p> <p>These are included within section 7, paragraph 7.3. This lists the highway and traffic improvement projects.</p> <p>Theme 3 within the Blakeney Neighbourhood Plan is specifically targeted at the Local Economy and Tourism. Policies 15 and 16 seek to support more local employment and retain commercial premises, while policy 17 is focuses specifically on tourism.</p> <p>This has not been previous raised through any of the community events, consultation or by the Steering Group.</p> <p>None of the policies are specifically set out to either support or not this type of development. Policy 8 feels the most relevant – as it deals with 'infill' - and its criteria would need to be met along with elements of other policies in the Blakeney Neighbourhood Plan.</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
		<p>I'm unclear as to whether the plan as written would be deemed to support or oppose holiday annexes.</p> <p>Community projects and actions</p> <p>This seems to be a random selection of ideas: they are very interesting but what do they add to the plan if they do not relate to policies? What use will this list be put to?</p> <p>I am not sure of the criteria for ideas/projects to be added to the list but would propose the following for consideration?</p> <ul style="list-style-type: none"> - the establishment of a footway from Blakeney to Wiveton, either on the side of the road or, preferably, on the inside of one of the hedges. It is common to see people walking along this road which is quite dangerous and to which there is no practical alternative. - ensure necessary maintenance is carried out on the launching slip in the Carnser car park which is at risk of being lost through lack of maintenance. <p>Note: can I just say that the form as presented with the simple "yes/no" format does not distinguish between the ambition of a policy and the policy itself.</p>	<p>Comments noted. The ideas have come from residents and stakeholders at the community events but have not been able to be taken forward in the policies – either due to there not being a identifiable way of delivering or the evidence available does not support or they are not land use.</p> <p>The Steering Group have compiled the list to ensure the ideas and suggestions are not lost and can be actioned should a group be so minded. Will be added to the Community Projects and Actions list.</p> <p>Comment noted. The policy is the important element that was being consulted on. The Ambition statement is there to aid the understanding of the policy and the intended outcome of that policy.</p> <p>Proposed action:- Comments noted and the following changes to the BNHP are proposed.</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
			<p>Add to the supporting text of Policy 12 the reference to ‘Institute of Lighting Professionals, Guidance Notes for the Reduction of Obtrusive Lights which gives guidance for lighting in an AONB.’</p> <p>6.238: Add a new paragraph “To reduce light pollution the following actions are encouraged: -</p> <p>a) The illumination of buildings themselves is not acceptable as this causes reflected light pollution. b) Lights to be sited as low as possible such that they avoid light spillage off the property. c) Lights to be of the lowest level of brightness required in order to minimise reflected light and use less power.</p> <p>Add map(s) to identify each area of open space listed in Table 2 associated with Policy 13.</p> <p>Section 7: Community Projects and Actions list – add project to review parish street lighting.</p> <p>7.2: Add additional project to seek the establishment of a footway from Blakeney to Wiveton.</p>
PS/20 Strutt & Parker		<p>Overall disagree with the Neighbourhood Plan.</p> <p>Please see attached correspondence in relation to Section 5: Sustainable Growth and Development (5.16 – North Norfolk Site Allocations).</p>	<p>Thank you for your response and your disagreement to the Neighbourhood Plan is noted.</p> <p>Thank you, the attached correspondence has been included as part of your response detailed here.</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
	Section 5	<p>I write in relation to the Blakeney Parish Council Pre-Submission Neighbourhood Plan (Consultation) and on behalf of my client, The Oddfellows. Strutt & Parker has been appointed by The Oddfellows to prepare a representation in respect of the Neighbourhood Plan.</p> <p>This submission comprises this letter together with the following supporting documents:</p> <ul style="list-style-type: none"> • Supporting landscape statement, commissioned by my client The Oddfellows and prepared by SES (Southern Ecological Solutions); • Pre-submission Consultation Form; • Site location plan showing the location of my client's site and potential future site; • Map 4 of the Neighbourhood Plan – Potential Sites in Blakeney. <p>Section 5 of the Neighbourhood Plan (Pre-Submission Version v1) focusses on Sustainable Growth and Development and at 5.16 focusses on the North Norfolk Site Allocations. It is expected that the new North Norfolk Local Plan will be adopted by North Norfolk District Council in late 2020 and identifies Blakeney as a 'Large Growth Village'. The Emerging Local Plan proposed an allocation of 30 new homes on a 1.5-hectare site known as BLA04/A in Blakeney, as seen on Map 5 within the Pre-Submission Neighbourhood Plan.</p> <p>My client wishes to oppose the allocation referred to as BLA01/A, and instead support the sites known as BLA01 and BLA09 (as shown on Map 4 of the Pre-Submission Version v1 Neighbourhood Plan and</p>	<p>Comment noted and thank you for explaining the context of your response.</p> <p>Comment noted and all supporting documents have been received.</p> <p>Comments noted. Please note section 5 of the Blakeney Neighbourhood Plan sets the context in which the Plan has been developed and the requirement under the Neighbourhood Planning Regulations to meet the 'basic conditions'. This includes conformity with the current Core Strategy and not undermining the emerging Local Plan.</p> <p>Comments Noted. Thank you for providing details of your opposition to the 'preferred' site (BLA04/A) put forward by North Norfolk District Council in their</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
		<p>included within this submission), which were considered by, but ultimately rejected by North Norfolk District Council. The justification for recommending these alternative sites is on the basis that they would form a more appropriate location at which to focus Blakeney's future growth, and the justification for this is set out in detail below, and in the accompanying landscape statement.</p> <p>Strutt & Parker previously submitted two sites on behalf of The Oddfellows to the Council's 'call for sites' exercise, for consideration as potential development sites. These sites are known as the following:</p> <ul style="list-style-type: none"> • Land to the south of the A149 Morston Road, Blakeney (BLA01); and • Land west of Langham Road, Blakeney (BLA09). <p>However, despite being available, deliverable and achievable these sites were rejected by North Norfolk District Council, this representation seeks to explain why my client considers that the Parish Council should consider the site known as 'Land to the South of A149, Morston Road, Blakeney' for its approach to the future growth of Blakeney (please see the accompanying location plan showing the site hatched red).</p> <p>Site BLA04/A</p>	<p>recent Regulation 18 consultation on the first draft of the emerging Local Plan.</p> <p>The preference suggested is that of North Norfolk District Council and not an allocation by the Blakeney Neighbourhood Plan.</p> <p>North Norfolk District Council have made this choice based on their sustainability assessment and evidence they have previously collected or had presented to them.</p> <p>Comments noted. We are pleased to hear that you have responded to North Norfolk District Council and hope that you have provided them with all this information to enable the District to evaluate the alternatives for sustainability and deliverability as the District progresses through its plan making process.</p> <p>Comments noted. We would remind you that the rejection of these two sites is a choice North Norfolk District Council has made and NOT the Blakeney Neighbourhood Plan.</p> <p>North Norfolk District Council have outlined in their document First Draft Local Plan Alternatives Considered why the District has selection BLA04/A as their 'preferred' site and why BLA01 and BLA09 – along with six other alternatives considered – have not been selected.</p>

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		<p>The Council has chosen to allocate the site known as BLA04/A for 30 new homes within the village. This has been allocated on the basis that the Council considers the site to have a less sensitive landscape setting than other sites in the village. The assessment also states that the location is 'reasonably well contained within the landscape' (paragraph 88, North Norfolk First Draft Local Plan).</p> <p>We believe that it is evident that site allocation BLA04/A is not 'reasonably well contained in the landscape' (as but rather, as the supporting Landscape Statement confirms, is very prominent in the landscape.</p> <p>The proposed allocated site is extremely open and given the relatively well established settlement edge the proposed allocation of the site would have significant localised landscape and visual impact in views from Langham Road and Saxlingham Road, and public rights of way including Footpath 6 (FP6) to the rear of Kingsway, the end of Bridleway 5 (BW5) along Wiveton Down to the south, and Footpath 7 (FP7) along the drive to the south west.</p> <p>Availability of Alternative Sites My client's land comprises two land parcels, both of which are availability, deliverable and achievable but for the purpose of this representation we are recommending the parcel known as BLA01 be put forward, BLA09 (shown as the site hatched blue on the accompanying location plan) available for future growth. There is also considerable market interest in the land and no significant planning</p>	<p>Comments noted, although you should recognise that North Norfolk District Council has not allocated site BLA04/A – at this time it is shown as the District's 'preferred' site – and can only be allocated once the emerging Local Plan has completed Regulation 19, tested by examination and adopted by the District. Only then will the site or sites have the status of 'allocated'.</p> <p>Comment noted, this assessment was undertaken by North Norfolk District Council and is their view.</p> <p>Comments noted. This is your assessment which differs to the assessment and view taken by North Norfolk District Council.</p> <p>Comments noted. The Steering Group, supported by the Parish Council, has decided that the Blakeney Neighbourhood Plan will not be making any land allocations, as the work North Norfolk District Council is undertaking in the preparation of the emerging Local Plan are well advanced and a total of nine sites has been assessed through the planning process. It is not the intent for the Blakeney</p>

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	Policy 1	<p>constraints that would reduce or eliminate its potential to come forward for development.</p> <p>We are putting forward the alternative land to the Parish Council as part of this consultation. Land to the South of A149, Morston Road, Blakeney (shown hatched green on the accompanying location plan) is currently used for agricultural purposes and is located immediately adjacent to the recently completed Harbour Way development (built by Hill) and could be accessed to the south of this, enabling rejected site reference BLA09 to also come forward in the future.</p> <p>The site is well enclosed between the existing built form to the north and Wiveton Down (forming a ridge to the south and west). The principal views are from Langham Road and FP7 along the drive to the south, and to a lesser extent from Saxlingham Road, FP6 and the A19/Morston Road. FP7 is elevated above the level of the site, and subsequently there are views over and between the boundary vegetation to the north towards the North Sea and the east to St Nicholas' Church.</p> <p>The recently developed site at Harbour Way provides an indication of the change to these views and the extent of development would be increased but would be partially softened by the intervening hedge. The site could be delivered for a combination of market and affordable housing together with open space and the creation of new footpaths/cycleways enhancing permeability into the village. It is estimated that the site could deliver</p>	<p>Neighbourhood Plan to make additional allocations over and above those that will ultimately be in the emerging Local Plan.</p> <p>Comments noted, please see comments above which outlines the Parish Council's position in relation to site allocations.</p> <p>Your representation needs to be made to North Norfolk District Council as they continue the plan making process for the emerging Local Plan.</p> <p>Comments noted. Thank you for recognising the need for affordable housing for local people. There are other means of delivering affordable housing on sites that would not normally be used for housing.</p> <p>An option for your client, if keen to help address the local need for affordable homes, is to bring forward proposals for 'rural exception sites', although these</p>

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		<p>between 60-85 residential units, of which as Policy 1 of the Pre-Submission Neighbourhood Plan states, a proportion of these could provide much needed Affordable Homes for Local People.</p> <p>There are no access issues and full vehicular/cycle access can be achieved directly from Langham Road. The site flat with slightly raised land to the south and west shielding the site from long-range views (and helping to contain the site). In terms of heritage constraints, the site is not located within a Conservation Area, nor within or close to the setting of any listed buildings. There are also no scheduled monuments on the site or in its vicinity.</p> <p>There are no stability or contamination issues on the site and the site is entirely located within Flood Zone 1 and therefore at very low risk from flooding. Furthermore, there are no legal issues relating to the site, which is within a single ownership.</p> <p>The site is well-related to the existing settlement with residential development on its northern boundary and should be reconsidered.</p> <p>I trust that this representation and the enclosure are self-explanatory. I would be very happy to discuss the above in more detail, and would like to stress my client's commitment to working with Blakeney Parish Council and the neighbourhood plan group.</p>	<p>are unlikely to deliver the profitability that your client may be seeking.</p> <p>Comments noted.</p> <p>Comment noted.</p> <p>Comment noted, although the site is outside the Settlement Boundary for Blakeney.</p> <p>Comments noted. In the section on the Emerging Local Plan all the alternatives put forward by landowners and agents are shown on Map 4. Additional supporting text will be added to paragraph 5.31 to emphasize the 'preferred site' is North Norfolk District Council's choice.</p>

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			Proposed action:- Comments noted and no changes to the BNHP are proposed.
<p>PS/21 Blakeney Residents Kingsway</p>		<p>Blakeney Neighbourhood Plan Concerns</p> <p>I am writing to you in your capacity as Chairman of the Blakeney Neighbourhood Plan (BNP) Committee on behalf of several resident of Kingsway regarding certain statements made in the Draft BNP. These residents will also be sending in their Pre-Submission Consultation Response Form highlighting certain potential amendments.</p> <p>We recognise that the Draft BNP is an extensive and valuable document which, once approved and adopted by the village and North Norfolk District Council, will set out what Blakeney residents want to see regarding building development and environmental protection for the next 20 years or more. You and your committee should rightly be congratulated on the Draft document.</p> <p>This letter sets out a more detailed response regarding statements made in the Draft BNP document and NNDC's Preferred Site for new housing in Blakeney in the Draft Local Plan 2016-36.</p> <p>The first major point to state is that those of us in Kingsway, who have objected to the Draft Local Plan 2016-36 Preferred Site designated as BLA04/A via the Consultation Portal, are not per se against the need for more housing in Blakeney; quite the</p>	<p>Thank you for your response to the consultation Blakeney Neighbourhood Plan.</p> <p>Comments noted and thank you of outlining the context of your response.</p> <p>Comments noted and thank you for recognising the importance the Neighbourhood Plan will have for the future of our village.</p> <p>Comment noted and thank you for taking the time to provide detailed comments and views.</p> <p>Comment noted. We are pleased to hear that your objections have been lodged with North Norfolk District Council in response to their proposed preferred' site (BLA04/A) put forward by the District in their recent consultation on the first draft of the emerging Local Plan. Thank you for recognising there</p>

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		<p>opposite in fact, in that we understand the need for more affordable type housing to be built.</p> <p>The second major point is that some Kingsway residents are passionate about ensuring that the environmental and landscape impact of any such new housing development scheme is minimised.</p> <p>This passion is evidenced by the fact that we are frequently resident in Blakeney and/or have visited Blakeney many times before owning a property in Kingsway. In fact my own association goes back to 1970 when Mr & Mrs Goldsmith (my in-laws) moved into Kingsway and became very active in the village organisations including the Parish Council.</p> <p>We are therefore concerned that the statement in Section 5.31 appears to endorse the Draft Local Plan Preferred Site selection of BLA04/1.</p> <p><i>“Policy HOU 1 identifies a total growth of 54 new homes to 2036 and Policy DS1 proposes an allocation for 30 new homes on a 1.5 ha site BLA04/1..”</i></p> <p>This statement is completely counter to the statement in Section 5.21 which refers to the then new development in Avocet View stating <i>“The area identified as suitable for development was selected in order to minimise landscape impact”</i>.</p>	<p>is a need for housing that is affordable for local people.</p> <p>Comment noted. The community of Blakeney is strong in its views on preserving the village and has continued to support the development of the Neighbourhood Plan to make a significant difference in shaping the future of our village.</p> <p>Comment noted.</p> <p>Comment noted. North Norfolk District Council have made this choice based on their sustainability assessment and evidence they have previously collected or had presented to them.</p> <p>The preference suggested is that of North Norfolk District Council and not an allocation by the Blakeney Neighbourhood Plan. Text will be added to make it clear that Site BLA04 is North Norfolk District Council's choice of site and their preference for development of the sites that came forward.</p> <p>Comment noted. These are the words used by North Norfolk District Council following their assessments in their documents.</p>

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		<p>BLA04/1 cannot be said to minimise landscape impact</p> <p>As you may know, the Draft Local Plan Consultation Portal received 15 representations against BLA4/01 with many advocating BLA01 (to be designated alongside the existing Harbour Way (Avocet View) development). Only two representations supported BLA04/1 and their support was primarily for the need for new homes in the village.</p> <p>Blakeney Parish Council's view on BLA04/1</p> <p>Blakeney Parish Council (BPC) did not make any comments as BPC either way regarding BLA04/1 in their response to the Draft Local Plan. So it is difficult to see how the BNP can include the statement in Section 5.31 without some further balancing comment at the very least. Otherwise it does look like tacit approval of BLA04/1</p> <p>As most members of your committee are not Parish Councillors, I feel it is only appropriate that they should be made aware of the environmental and landscape concerns expressed in my email to BPC of June 10th (appended below)</p> <p>Environmental and Landscape Impact Studies.</p> <p>The 15 Objection Representations made via the Draft Local Plan Consultation Portal largely agreed that the selection of BLA04/1 cannot have been made on the basis of minimising the environment impact. Quite the reverse is true.</p>	<p>Comment noted.</p> <p>Comment noted. We are pleased to hear that you have responded to North Norfolk District Council and hope that you have provided them with all this information to enable the District to evaluate the alternatives for sustainability and deliverability as the District progresses through its plan making process and finalises its choice of allocations.</p> <p>Comments noted. As per comments above text will be added to make it clear the words express the views of North Norfolk District Council.</p> <p>Comment noted. As requested, all members of the Steering Group will see a copy of your email.</p> <p>Comments noted. The assessment has been made by North Norfolk District Council and this is their view being expressed.</p>

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		<p>There are not one but two expert reports written by respected environmental, planning and landscape consultancies (Axis Ltd and Southern Ecological Solutions Ltd). These reports are highly critical of the selection of BLA04/A as the Preferred Site. Copies of their reports are attached to my accompanying email and I urge you and your colleagues to read them.</p> <p>Both of these consultancies reached the same basic conclusion that the Preferred Site of BLA04/1 would not achieve the objective of ensuring a minimal impact on the environment. Furthermore BLA04/1 would in fact be counter to several statements made and adopted in the recent Blakeney Conservation Report of August 2018.</p> <p>In summary Axis stated</p> <p><i>3.1.7 As such, both BLA01 and BLA09 should be considered more preferable to BLA04/A in respect of landscape and visual impact, and comparable in terms of access. Therefore, it is considered that the selection criteria for the preferred allocation (BLA04/A) is not robust and will not be defensible when the plan is examined.</i></p> <p><i>3.1.9 Development within these two parcels of land (BLA01 & BLA09) would be a natural extension to the recent Avocet View development and would allow for future natural expansion, if developments are design to facilitate this.</i></p>	<p>Comments noted. North Norfolk District Council, based on the comments and evidence they have received and the sustainability assessment, to evaluate which, if any, sites in Blakeney are appropriate.</p> <p>Comment noted.</p> <p>Comment noted. North Norfolk District Council will make the choice of which is their preferred site in the Regulation 19 consultation document.</p> <p>Comment noted.</p>

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		<p>4.1.1 <i>The selection of BLA04/A as the preferred location for residential expansion in Blakeney appears to be based on a number of factual errors and contradictory assessments that are not robust when reviewed through site visits to the area. As such, the selection of the preferred site allocation should be reconsidered in favour of sites that are less conspicuous in the landscape, would have less of an impact on residential amenity, public footpaths and the setting of St Nicholas church.</i></p> <p>In summary SES stated</p> <p>5.5 <i>A comparative assessment has been made with the preferred Site Option identified as Site Reference BLA04/A ('the preferred site'), which is allocated in draft by policies DS1 (Proposed Allocations) and DS24 (Land East of Langham Road) for approximately 30 dwellings. The assessment confirms that the development of this site would have a significant local landscape and visual impact including views to St. Nicholas's Church. Such impacts would be difficult to mitigate (even in the long-term) and/or substantially limit the number of dwellings which could be provided.</i></p> <p>5.6 <i>5.6 In conclusion, site BLA01 is the preferred location of growth from a landscape perspective. The site provides a logical extension which can be well integrated into the village and its surrounding landscape.</i></p> <p>In the Blakeney Conservation Area Appraisal and Management Plan Report :-</p>	<p>Comments noted. North Norfolk District Council will review the evidence and evaluate the sites based on the comments and information from the Regulation 18 consultation.</p> <p>Comments noted.</p> <p>Comment noted.</p> <p>Comment noted.</p>

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		<p><i>P88 : New development will not negatively impact on views within or towards the Conservation Area and views of landmark buildings will be preserved.</i></p> <p><i>P93 : Views of Blakeney from Wiveton and Cley, and from the surrounding landscape to the south and south- west will be preserved.*</i> <i>* i.e from Langham and Saxlingham Roads</i></p> <p>In view of these independent reports which address issues within Planning and Environmental planning regulations, it is hard to see how the BNP can just include Section 5.31 without a balancing section or making a statement suggesting BLA01 as an alternative.</p> <p>Requested Action by the BNP Committee when amended the Draft BNP.</p> <p>Firstly, I would hope that you will share this email with all members of the BNP Committee.</p> <p>I have specifically included Rosemary Thew in this email as I and Dave Foreman met with Rosemary, Tracey and Edward Hackford back in June about our concerns over BLA04/1 when then Draft Local Plan Consultation became open. Secondly, I would hope that your committee read through the two consultancy reports lodged at NNDC and appended to this email.</p> <p>I would then ask that you modify or balance the statement in 5.31 along the following lines either within 5.31 or in a new section 5.33.</p>	<p>Comment noted.</p> <p>Comment noted and additional text will be added to make it clear that it is North Norfolk District Council that has selected the 'preferred' site.</p> <p>Comment noted and the Steering Group will see your response in full.</p> <p>Comments noted. The Steering Group have all received a copy of the two reports you have submitted.</p> <p>Comment noted. Additional text will be added to make it clear that it is North Norfolk District Council that has selected the 'preferred' site.</p>

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		<p>“Notwithstanding the Preferred Site BLA04/A identified in the Draft Local Plan, the alternate site designated as BLA01 (also identified in the Draft Local Plan) will minimise the impact of any such housing development as BLA01 is sited adjacent to BLA03 (“Avocet View - now Harbour Way” housing development). Furthermore, BLA01 will provide a strategic solution for future housing development within Blakeney. It will also provide an important Green Space Provision and be connected to the village through pedestrian access to Queen’s Close housing area. None of these additional features are served by BLA04/A.”</p> <p>In Conclusion</p> <p>I hope that you can see the theme running through this correspondence which is that certain residents in Kingsway care passionately about how Blakeney will develop over the next 20+ years. I can't believe that there are not other Blakeney residents who feel similarly about BLA04/A.</p> <p>I believe therefore that the Draft BNP should take our concerns into consideration for the whole of the village.</p> <p>The Preferred site BLA04/A is on the East side of Langham Road. When visitors to Blakeney crest the hill on the Langham Road and first see Blakeney laid out before them, they see on the East side of Langham Road, a very mature and open field line with well-established mature trees (partly hiding the houses on the south side of Kingsway). On the West side of Langham Road, they can just about see the</p>	<p>Comments noted. Thank you for your suggested wording although this will not be used. The Steering Group, supported by the Parish Council, has decided that the Blakeney Neighbourhood Plan will not be making any land allocations, therefore, no assessment by the Steering Group will be made of the two sites listed or the other seven alternatives that North Norfolk District Council has appraised in the preparation of the first draft of the emerging Local Plan through the planning process. It is not the intent for the Blakeney Neighbourhood Plan to make additional allocations over and above those that will ultimately be in the emerging Local Plan.</p> <p>Comments noted. Once North Norfolk District Council has completed its review of the comments and responses it has received the District will publish all those responses it has received, and you will be able to see how other Blakeney residents have responded and feel about this site.</p> <p>Comments noted. Your concerns will be taken into account and considered by the Steering Group.</p> <p>Comment noted.</p>

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		<p>rooftops of Harbour Way houses just above the mature roadside hedgerow lines.</p> <p>Any support for BLA04/A being built on the East side of Langham Road behind Kingsway will irrevocably destroy this cresting view of Blakeney.</p> <p>Preservation of such views from Langham Road and the Saxlingham Road are implicitly recognised in sections of the the Blakeney Conservation Report of August 2018.</p> <p>Support for BLA01 will ensure that any development has a minimum visual and environmental impact, yet provide the necessary capacity for housing within and beyond the 2016-36 Plan.</p>	<p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Proposed action:- Comments noted and the following changes to the BNHP are proposed:-</p> <p>Paragraph 5.31: Add the following text - “this is North Norfolk District Council’s choice of the sites that came forward and their preference for further residential development.”</p>
<p>PS/22 Blakeney Resident</p>	<p>Policy 1</p>	<p>I would like to make the following comments on the draft Blakeney Neighbourhood Plan</p> <p>Policy 1 Affordable homes for local people</p> <p>I agree with the ambition of this policy and recognise that the principle had a high level of support from the community. However, I repeat here what I have said in Steering Group meetings but which was not accepted by the group: I am concerned that the policy and introduction, as</p>	<p>Thank you for your response.</p> <p>Comments noted. See answers to your questions below.</p>

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		<p>written, is misleading because it overstates the number of affordable homes which are likely to be provided for local people during the life of the plan. I explain the reasons for this below:</p> <p>Para 6.47 states that “10 – 15 local households... will initially benefit (dependent on Local Plan Affordable Home Policy percentage) although this number is likely to increase over the lifetime of the development.”</p> <p>How has this statement has come about?</p> <ol style="list-style-type: none"> 1. Firstly, what development is likely in Blakeney? <p>No sites (large enough to be required to provide affordable housing) are likely to come forward until the NNDC draft Local Plan (2016-36) is adopted.</p> <p>Assuming the plan is adopted as currently drafted, there will be a development of 30 homes, 35% of which (according to the draft local plan) will be affordable. Thus, there will be about 10 affordable homes.</p>	<p>Comment noted and please see answers to each of your questions below.</p> <p>Comment noted. The emerging Local Plan is likely to allocate at least one site for at least 30 new homes.</p> <p>The Core Strategy Policy Ho 2 on Affordable Homes requires a level of 50% affordable homes. As a site has been identified as the ‘preferred’ site it could be possible for this to come forward for development prior to the adoption of the emerging Local Plan. The requirement for affordable homes would, in this instance, be the requirement in the Core Strategy.</p> <p>Comment noted. The Policy DS24, as drafted, states ‘approximately’, which is usually taken to mean at least. Section 20.1 on page 272 of the First Draft Local Plan (Part 1) identifies that a requirement of 11 affordable homes will be required by the emerging Local Plan.</p> <p>As there are alternative sites and the emerging Local Plan does not allocate sufficient sites to meet the homing need of the District further sites could be allocated in subsequent versions of the emerging</p>

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		<p>2. How many of these will be allocated to “local” people? (As defined in Policy 1 of the Blakeney draft Neighbourhood Plan.)</p> <p>This is a moot point, NNDC policy is that this type of “strategic” development is subject to their own allocation policy which is determined by housing need in the whole of the North Norfolk District.</p>	<p>Local Plan if suitable sites cannot be found in other locations.</p> <p>With the pressure on the delivery of new homes there is a danger that North Norfolk District Council may not be able to demonstrate a 5-year land supply.</p> <p>If this happens then the District, including Blakeney, will be vulnerable to predatory applications that it may have to allow.</p> <p>Therefore, the range of 10 – 15 does seem appropriate as it covers a number of possible outcomes dependent of circumstances and timing.</p> <p>Comments noted. All of the affordable homes (see comments above on the range of likely number) will be available to households with a local connection first (where there is an identified need based on the cascade criteria). As per the Policy, there is a cascade and if there are no eligible households allocation will then be in accordance with the Housing Allocation Policy.</p> <p>Comment noted. The District wide policy will only be applied if there is no local need, see comments above. As the development is within the Blakeney Neighbour Area the policies of the Blakeney Neighbourhood Plan will be applied to all development proposals that come forward after the Neighbourhood Plan is ‘made’ (adopted). Consideration and ‘weight’ must be given to the policies of the Neighbourhood Plan once it has completed its examination.</p>

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		<p>However, there is some disagreement amongst the professionals and some of them believe that it will be possible for Blakeney households to be given priority as a result of Policy 1 of the Neighbourhood Plan. The proportion of homes which may be allocated on this basis is unclear but likely to be somewhere between 35% and 100%, depending on who you talk to.</p> <p>If you believe in 35%, approximately 3 affordable homes will be provided to local people. If you believe in 100%, some 10 affordable homes will be provided to local people.</p> <p>3. Where does "15 homes" come from?</p> <p>This is in the event that one is able to cherry pick the most favourable policies from both the present and future NNDC Local Plans: ie</p> <ul style="list-style-type: none"> • 30 homes are developed (draft NNDC Local Plan); • 50% of these are affordable (existing NNDC Local Plan); • all the affordable homes go to households with a Blakeney connection; (abandonment of NNDC affordable home allocation 	<p>Comments noted. Many adopted Neighbourhood Plans have a policy that enables households with a local connect to be give priority over the needs-based assessment undertaken as part of the District's Housing Allocation Policy. Other District Councils in Norfolk already apply policies that enable local connection.</p> <p>The Housing Officer at North Norfolk District Council has agreed that all (100%) of the new affordable homes in Blakeney could, in the first instance, be made available to householders with the eligible local connection.</p> <p>Comment noted, see answer to question 1 above that outlines how 15 may be the number of affordable homes.</p> <p>Comment note. The assumption made is incorrect. The requirement will be based on the policy that is adopted - it is not possible to 'pick the most favourable'.</p> <p>Therefore, until the emerging Local Plan is adopted the requirement is 50% of the total number of new homes will be affordable homes, as per the Core Strategy. Once the emerging Local Plan is adopted the requirement will be 35%, as the emerging Local Plan policy requirement will supersede the Core Strategy policy.</p>

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	Policy 3	<p>policy and, instead, allocation of all affordable homes to Blakeney connections).</p> <ul style="list-style-type: none"> (Did anyone else see the herd of unicorns grazing on the Pastures the other day??!!) <p>Finally, Paragraph 6.47 also states that "...this number is likely to increase over the lifetime of the development." How can this come about?</p> <p>In view of the above, I feel that this policy is misleading to the community.</p> <p>Policy 3 Change of use from residential to holiday accommodation</p> <p>Whilst I agree in principle with the ambition to resist the wholesale conversion of residential homes into holiday accommodation, I do not believe this policy will achieve this aim because, as noted in para 6.72 – 6.75, it is rarely (if ever) necessary to obtain planning permission to change the use of a residence to holiday accommodation and this policy will only have an effect where planning permission is required.</p> <p>Therefore, I disagree with this policy because, as with policy 1 above, I think it is misleading as it implies a</p>	<p>Comment noted although is not relevant to the Blakeney Neighbourhood Plan.</p> <p>Comment noted. Over the lifetime of the development it is likely that residents will move, enabling another householder with a local connection, as defined in Policy 1, to be able to access the affordable home as a priority. Therefore, the number of households who will benefit from the affordable homes will increase over time.</p> <p>Comment noted. The policy is clear that it will enable local households to access affordable homes in Blakeney.</p> <p>Comments noted. In 2018 North Norfolk District Council identified there are 127 homes of the total of 711 in the village that have this status. (See Table 1 of the Blakeney Neighbourhood Plan). Nearly 18% of the total number of homes.</p> <p>The impact going forward is expected to be limited but that does not prevent the community of Blakeney taking action and starting somewhere to address this issue.</p> <p>Comment noted. The policy is clear and the supporting text evidence and clarity required to</p>

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	<p data-bbox="398 454 504 486">Policy 4</p> <p data-bbox="398 1045 504 1077">Policy 5</p> <p data-bbox="398 1372 515 1404">Policy 13</p>	<p data-bbox="604 255 1279 351">greater degree of control over the use of properties as holiday accommodation than it would actually provide.</p> <p data-bbox="604 391 1279 454">Policy 4 Change of use from holiday accommodation to residential</p> <p data-bbox="604 454 1279 845">My understanding is that it is even more rare for planning permission to be required in the event of a change from holiday accommodation to residential than it is for the reverse. Further, given that this policy requires the Principal Residence condition (Policy 2 of the Blakeney Neighbourhood Plan) to be applied to any properties undergoing such a change of use, it will be extremely unattractive to the property owner (even one who fully intends to live in the home permanently). Therefore, I can imagine no circumstances under which anyone would apply for such permission.</p> <p data-bbox="604 885 1279 949">As this policy will probably have no effect, it is potentially misleading.</p> <p data-bbox="604 981 1279 1013">Policy 5 Extensions to holiday accommodation</p> <p data-bbox="604 1013 1279 1268">Is it possible to restrict extensions to holiday accommodation as distinct from residences? Even when, as noted above, there is normally no difference in planning terms between residence and holiday accommodation? I believe this policy implies a greater degree of control/restriction over holiday accommodation than the Neighbourhood Plan would actually carry.</p> <p data-bbox="604 1308 1279 1340">Policy 13 Open Space Preservation</p> <p data-bbox="604 1340 1279 1396">I should note that my home (39 New Road) is listed as one of the open spaces to be preserved so,</p>	<p data-bbox="1332 255 2007 351">explain the situation and how the action will make a difference, albeit, the numbers are expected to be low.</p> <p data-bbox="1332 454 2007 646">Comments noted. Any of the currently identified 127 homes with this usage classification could be returned to residential use. When this happens, it is desirable for the Principle Residence condition applied to prevent it becoming a second home, as per Policy 2.</p> <p data-bbox="1332 885 2007 949">Comment noted. This policy will prevent the increase of second homes in its application.</p> <p data-bbox="1332 1013 2007 1173">Comments noted. Yes, these are commercial premises and their usage classification is the differential. The ambition of this policy isn't about control – it seeks to reduce the detrimental impact some development has had on residents.</p> <p data-bbox="1332 1340 1556 1372">Comment noted.</p>

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		<p>although I am a member of the Steering Committee, I took no part in these discussions as I have a personal interest.</p> <p>Whilst I feel it is very important to preserve certain open spaces within the village of Blakeney I feel there are several problems with Policy 13 of the draft Neighbourhood Plan as it is written:</p> <ul style="list-style-type: none"> ▪ The policy ambition states that it is “not seeking Local Green Space designation”. Why is this? Surely a nationally recognised designation would confer greater protection to these areas? ▪ Unsurprisingly, I object to the inclusion of my home, 39 New Road, on the list as it is not an “open space”. ▪ No map is provided in the draft Neighbourhood Plan, thus it is impossible for the community to understand what areas are being proposed or the extent of these areas. <p>Policy 15 Local employment</p>	<p>Comments noted.</p> <p>The Steering Group decided not to seek Local Green Space designation for these areas as many are in private ownership and at this time it is not possible to know how to be capable of enduring beyond the end of the plan period – a requirement of the NPPF in the designation of Local Green Space.</p> <p>Some of these open spaces are not ‘green’, but are seen as important open space within the village.</p> <p>Comments noted. Being located at the heart of the village and within the Conservation Area it is felt important that this open space should be preserved.</p> <p>As an area it meets two of the three reasons for being important open space to Blakeney. Firstly, historic and secondly, strategic – as defined in paragraphs 6.253 and 6.255 of the Blakeney Neighbourhood Plan.</p> <p>Comment noted. A map of the specific areas identified in Policy 13 will be added.</p>

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		<p>Thank you for consulting the Environment Agency on the Blakeney Neighbourhood Plan. We have reviewed your draft and have the following comments to make as part of the Regulation 14 Pre-Submission Consultation.</p> <p><u>Background</u></p> <p>Our principal aims are to protect and improve the environment, and to promote sustainable development. We:</p> <ul style="list-style-type: none"> • Act to reduce climate change and its consequences • Protect and improve water, land and air • Work with people and communities to create better places • Work with businesses and other organisations to use resources wisely. <p>You may find the following two documents useful. They explain our role in in the planning process in more detail and describe how we work with others. They provide:</p> <ul style="list-style-type: none"> • an overview of our role in development and when you should contact us • initial advice on how to manage the environmental impact and opportunities of development • signposting to further information which will help you with development • links to the consents and permits you or developers may need from us. <p>Building a better environment: Our role in development and how we can help, https://www.gov.uk/government/uploads/system/u</p>	<p>Comments noted.</p> <p>Comments noted. Thank you for highlighting these resources. The Steering Group will review and include any additional points or information that may help with explanation or justification.</p>

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	Policy 10	<p>Gain' should be a central objective. This can be achieved through creating; green corridors; woodland and hedgerows; pollinator banks; and new wetland habitat. This will help to achieve biodiversity 'Net gain' and bring multiple benefits for wildlife and people</p> <p><u>Flood Risk</u></p> <p>We are pleased to see that all the site allocations (confirmed and proposed) are situated outside of tidal flood risk in both the current day and with climate change (up to 2115). Our specific comments on site allocation Maps 3 and 4 are:</p> <ul style="list-style-type: none"> • Site allocation BLA03 on Map 3 is in Flood Zone 1 in both current day and with climate change (up to 2115). • Site allocations BLA01, BLA02, BLA04, BLA04/A, BLA05, BLA06, BLA07, BLA08, BLA09 and BLA11 on Map 4 are all located in in Flood Zone 1 in both current day and with climate change (up to 2115). <p>We note that there is a flooding chapter (6.153), which sets out the ambition and policy of this proposed neighbourhood plan. Please see specific comments below regarding this flooding chapter:</p> <ul style="list-style-type: none"> • Point 6.154 sets out the ambition to reduce flooding risk in this neighbourhood plan. We note that the ambition focuses on surface water and sewerage as the key sources of flood risk to Blakeney. It is disappointing that 	<p>Comments noted. The proposed allocation, by North Norfolk District Council, is at this time their 'preferred' site and the District still has more work to do before reaching the stage of being able to allocate the site they have identified as their preference.</p> <p>Comment noted. North Norfolk District Council will be aware of this in their consideration of the site.</p> <p>Comment noted. North Norfolk District Council will be aware of this in their consideration of the sites listed.</p> <p>Comment noted.</p> <p>Comment noted. The risk, as seen from recent events, of tidal flooding is high in the area and will be specifically added to Policy 10.</p>

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		<p>this ambition does not provide at least an equal weighting to tidal flood risk, especially considering the historic tidal flooding event that are detailed in points 6.166, 6.167 & 6.169. We recommend that tidal flood risk is specifically mentioned within the flood risk ambitions of this plan.</p> <ul style="list-style-type: none"> Point 6.156 states that the Environment Agency Flood Zones identify that parts of Blakeney are in Flood Zone 2. This statement is incorrect and Map 6, which supports this statement is outdated. This point should state that the Environment Agency tidal Flood Zones identify that parts of Blakeney are in Flood Zone 3b, Flood Zone 3a and Flood Zone 2. We recommend that Map 6 is updated to show the new tidal Flood Zones (updated on 31 January 2019), which are available on .GOV.UK (https://flood-map-for-planning.service.gov.uk/) and are also available within the North Norfolk SFRA (https://www.north-norfolk.gov.uk/tasks/planning-policy/strategic-flood-risk-assessment/). Point 6.163 sets out the neighbourhood plans intention to contribute towards reducing flood risk in Blakeney. We note that the intention focuses on surface water and sewerage as the key sources of flood risk to Blakeney. It is disappointing that this ambition does not include tidal flood risk. We recommend that tidal flood risk is specifically mentioned as a source of flood risk as this 	<p>Comments noted. Map 6 and the supporting text will be updated as suggested.</p> <p>Comment noted. Tidal flood risk will be added to the text at 6.163 and to the ambition statement at 6.154.</p>

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	Policy 10	<p>plan should aim to make a positive contribution to this issue.</p> <ul style="list-style-type: none"> • We are glad to see that Policy 10 on drainage and flood risk requires that all proposals for new development within the Blakeney Neighbourhood Plan's area should be accompanied by a Flood Risk Assessment (FRA). We recommend that point 1 of policy 10 is updated to include tidal flood risk as a source of flood risk and that an FRA should demonstrate no increase to flood risk on the site or wider area. • On the climate change point within policy 10, it would be useful if it referred to the following link, which provides the appropriate climate change allowances: https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances • We suggest that reference to the Hunstanton to Kelling Hard Shoreline Management Plan (SMP) is included within point 6.172, as this strategy provides the relevant tidal flood risk policies for the area. • You may wish to include the following comments within Policy 10: An environmental permit for a flood risk activity may be needed from the Environment Agency for works in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m 	<p>Comment noted and criteria 1 of the policy will be updated to include tidal flood risk.</p> <p>Comment noted. Add link to the supporting text to Policy 10.</p> <p>Comment noted. Reference to the supporting document will be added to paragraph 6.172 and Appendix 2.</p> <p>Comment noted. The suggested wording will be added to Policy 10.</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
		<p>from a tidal main river and from any flood defence structure or culvert.</p> <p><u>Access to Flood Defences</u></p> <p>The Environment Agency currently use or require access to a number of locations in the Parish such as; Blakeney West Bank and the Blakeney to Cley Embankment in addition to watercourses which we maintain such as the Blakeney Drain. We should be contacted before any development work is carried out so that we can advise on what may be acceptable: This is to ensure we have access to our tidal flood defences.</p> <p><u>Informatives</u></p> <p>Please note that the views expressed in this letter are a response to the proposed Neighbourhood Development Plan only and do not represent our final view in relation to any future planning or permit applications that may come forward. We reserve the right to change our position in relation to any such application.</p> <p>Please contact me on the details below should you have any questions or would wish to contact any of our specialist advisors. Please continue to keep us advised on the progress of the plan.</p> <p>Attachments:- Planning for the Environment at the Neighbourhood Level. Environment Agency Flood Zone 3 Factsheet East Anglia (East) Oct 2017 – v.6</p>	<p>Comment noted. It is understood that this would be a precondition of any planning approval granted in the area by the Local Planning Authority.</p> <p>The Blakeney Neighbourhood Plan does not propose any additional sites for development. Those that have been approved through planning permissions or put forward in the emerging Local Plan will be conditioned by Local Planning Authority.</p> <p>Comments noted.</p> <p>Comments noted. The Environment Agency is already included on our 'stakeholder list' and will receive updates.</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
			<p>Proposed action:- Comments noted and the following changes to the BNHP are proposed: -</p> <p>6.154: Add text “..... sewerage or tidal.”</p> <p>6.156: Update text to read “The Environment Agency tidal Flood Zones identify that parts of Blakeney are in Flood Zone 3b, Flood Zone 3a and Flood Zone 2.</p> <p>Map 6: replace with new map to show the new tidal Flood Zones.</p> <p>6.157: Add supporting text and link. “Providing the appropriate climate change allowances, see link: https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances”</p> <p>6.163: Add to text “..... Risk of sewerage, surface water and tidal flooding in Blakeney.”</p> <p>Policy 10: Add to the list in criteria 1 “tidal”.</p> <p>Add a new paragraph at the end of the policy “An environmental permit for a flood risk activity may be needed from the Environment Agency for works in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m from a tidal main river and from any flood defence structure or culvert.”</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
			<p>6.172: Add the Hunstanton to Kelling Hard Shoreline Management Plan (SMP) to the list of supporting documents.</p> <p>Policy 11: Reword third paragraph to “New development must demonstrate how it delivers a ‘net gain’ in biodiversity and improves connections with existing.....”.</p> <p>Appendix 2: Add the Hunstanton to Kelling Hard Shoreline Management Plan (SMP) to the list resources.</p>
<p>PS/24 Norfolk Coast Partnership</p>		<p>Overall we are supportive but have some policy suggestions/observations.</p> <p>AONB Response The Neighbourhood Plan has clearly outlined the social, environmental and economic pressures and threats facing Blakeney. The wealth of designations and heritage combined with a dynamic coastline very susceptible to climate change makes planning a difficult task as the Plan also needs to recognise the need for appropriate development to meet the needs of residents and visitors.</p> <p>The Norfolk Coast Partnership is pleased to see that the AONB has been considered through policy and we have some observations and suggestions that might help to ensure that the special qualities of the AONB are conserved and enhanced in line with NPPF para 172.</p> <p>Holme-next-the-Sea has produced an AONB policy in their Neighbourhood Plan that’s currently out for</p>	<p>Thank you for your response and support.</p> <p>Comments noted. Blakeney is an amazing place and its important that future activities not only take account of needs and local economy, but also seek to preserve our heritage and environment.</p> <p>Comments noted. Paragraph 172 of the National Planning Policy Framework puts “great weight” on conserving and enhancing landscapes and scenic beauty within AONB. Limiting scale of development and requiring additional assessment.</p> <p>Comment noted. Blakeney is entirely situated within an Area of Outstanding Natural Beauty (AONB). The</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
		<p>consultation and we are very supportive of this approach. I have attached it so you can consider whether it is a policy you would like to add of if there is anything you can use.</p> <p><i>POLICY HNTS 19: AONB LANDSCAPE QUALITY</i> <i>Development proposals will be required to conserve and enhance the scenic beauty and special qualities of the AONB landscape.</i></p> <p><i>Views of the landscape and scenic beauty</i></p> <p><i>Proposals for new development outside the Holme development envelope must demonstrate that they will conserve and enhance the visual integrity, identity, sense of remoteness and scenic quality of the AONB landscape as viewed from Holme's network of footpaths. These views are coloured red on the views map. Views towards St Mary's Church and those across the Parish from Green Bank towards the village and the Lincolnshire coast are especially important.</i></p> <p><i>Sense of remoteness, peace and tranquillity</i></p> <p><i>All development proposals should conserve and enhance the sense of remoteness and the tranquillity of the Parish's AONB setting and should have regard for the following impacts:</i></p> <p><i>(i) Direct impacts resulting from changes to the visual and aural environment in the immediate setting of the development which may intrude, distract or disturb (ii) Indirect or secondary impacts caused beyond the site of the proposed development such</i></p>	<p>Steering Group has considered carefully a specific policy on AONB and concluded that, in the case of Blakeney, attributing a policy to AONB is not necessary beyond the specific requirements already included with the Blakeney Neighbourhood Plan policies.</p> <p>Specifically these are: - Policy 6, criteria 2 requiring sensitivity to natural assets of the surrounding area and being guided by the North Norfolk Landscape Character Assessment SPD.</p> <p>Policy 6, criteria 3 requires development to preserve or enhance the character and appearance, referencing the Blakeney Conservation Area Appraisal. This document in section 4 identifies Blakeney with the AONB and the Site of Special Scientific Interest (SSSI). Detailing the setting and important views – both of the natural environment - such as vistas across the Blakeney Salt Marshes and - of the built environment - such as the Grade I listed St. Nicholas Church.</p> <p>Policy 7, criteria 1 recognising and reinforcing the distinctive local character. And criteria 2 visual quality of the landscape and amenity views.</p> <p>Policy 12 that seeks to preserve the dark night skies.</p>

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	<p>Objective 5</p> <p>Policy 1</p>	<p><i>as those associated with traffic and car parking (iii) Cumulative impacts of incremental development</i></p> <p><i>Dark night skies</i></p> <p><i>In order to minimise light pollution all planning consents will be subject to the following conditions in respect of external lighting:</i> <i>(i) Fully shielded (enclosed in full cut-off flat glass fittings) (ii) Directed downwards (mounted horizontally to the ground and not tilted upwards) (iii) No dusk to dawn lamps (iv) White light low-energy lamps (LED, metal halide or fluorescent) and not orange or pink sodium sources</i></p> <p><i>Proposals including external lighting in prominent locations likely to be visible from the surrounding landscape will not normally be supported except where a requirement can be demonstrated in the interests of safety and security on public footways.</i></p> <p><i>Where internal lighting is likely to cause disturbance or risk to wildlife, including protected bird species, proposals will be sought for mitigating pollution from internal light sources. Large windows and roof lights are particularly relevant in this context.</i></p> <p>Objectives 5 – As well as preserving the local environment could you add enhance. This is in line with Para 172 and developers should be demonstrating net gain for biodiversity.</p> <p>Policy 1 – We support</p>	<p>Policy 13 that seeks to preserve existing open space within Blakeney.</p> <p>Comment noted. Policy 11 will be reworded to include 'net gain' for biodiversity.</p> <p>Support noted.</p>

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	Policy 2	Policy 2 – We support, Holme are proposing a similar policy so will be interesting to see what impact this has.	<p>Support noted. Many coastal villages are taking small steps, through the opportunity of neighbourhood planning, to start to address a difficult and complex issue that the Local Planning Authorities seem reluctant to act on.</p> <p>Comment noted. Light pollution is covered under Policy 12 although will be added as a third criteria.</p> <p>Support noted.</p> <p>Comment noted. Consideration of visual impact, not just large glass extensions, within design is covered under policies 6 and 7.</p> <p>Comment noted. Please see earlier comments relating to AONB.</p> <p>Thank you for highlighting this resource. The Norfolk Coast Partnership Landscape Character Assessment for the AONB will be added to the supporting documents in paragraph 6.132 and list of reference documents in Appendix 2.</p> <p>Comments noted. The suggested criteria will be added to Policy 6, criteria 11.</p>
	Policy 3	Policy 3 – Perhaps add light pollution in under para 2.	
	Policy 4	Policy 4 – We support	
	Policy 5	Policy 5- Could design be considered. Large glass extensions can be visually intrusive and modern materials can erode character.	
	Policy 6	<p>Policy 6 - Para 2 - We would like to see specific mention of the 'special qualities of the AONB'. The local character and distinctiveness is part and parcel of the AONB designation which is a higher level of protection than North Norfolk's Landscape Character Assessment SPD. For information we also have a Landscape Character Assessment for the AONB which you can see here: www.norfolkcoastaonb.org.uk/partnership/integrated-landscape-character/370</p> <p>Point 11 - When responding to applications that have lighting implications we use this standard text: 'National Planning Policy Framework Clause 125 and Norfolk County Council's Environmental Lighting Zones Policy both recognise the importance of preserving dark landscapes and dark skies. In order to minimise light pollution, we recommend that any</p>	

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		<p>outdoor lights associated with this proposed development should be:</p> <ol style="list-style-type: none"> 1) fully shielded (enclosed in full cut-off flat glass fitments) 2) directed downwards (mounted horizontally to the ground and not tilted upwards) 3) switched on only when needed (no dusk to dawn lamps) 4) white light low-energy lamps (LED, metal halide or fluorescent) and not orange or pink sodium sources <p>Please also refer to the Institute of Lighting Professionals, Guidance Notes for the Reduction of Obtrusive Lights which gives guidance for lighting in an AONB.</p>	<p>Comments noted. Thank you for highlighting this resource. The Institute of Lighting Professionals, Guidance Notes for the Reduction of Obtrusive Lights will be added to the supporting documents in paragraph 6.132 and list of reference documents in Appendix 2.</p>
	Policy 7	Policy 7 – ‘involve a high standard of design which enhances the visual quality of the landscape and built environment and does not have a significant detrimental impact on amenity views of surrounding countryside and coastline or the special qualities of the AONB ’.	Comment noted. Suggested wording will be added to Policy 7, criteria 2.
	Policy 8	Policy 8 - will not detract through scale, materials and design.	Comment noted. Suggested wording will be added to Policy 8.
	Policy 9	Policy 9- Again replacement dwellings should not detract through scale, materials and design.	Comment noted. Suggested wording will be added to Policy 9.

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		<p>4) white light low-energy lamps (LED, metal halide or fluorescent) and not orange or pink sodium sources</p> <p>Please also refer to the Institute of Lighting Professionals, Guidance Notes for the Reduction of Obtrusive Lights which gives guidance for lighting in an AONB.</p> <p>Also consider the implications of internal lighting where there are large areas of glazing. A lighting plan, appropriate low-level lighting, tinted windows, overhangs and blinds can mitigate impact.</p>	<p>Comment noted. Paragraph 3 of Policy 12 identifies the need for internal lighting impacts to be considered.</p>
	Policy 13	Policy 13 - We support	Support noted.
	Policy 14	Policy 14 - We support	Support noted.
	Policy 15	Policy 15 – We support	Support noted.
	Policy 16	Policy 16 – We support	Support noted.
	Policy 17	<p>Policy 17 - The AONB Management Plan talk a great deal about tourism and the impacts on the environment. We would like to see more explicit mention of the AONB designation in this policy as this holds more policy weight than the Landscape Character Assessment. It could be a simple sentence to respect the special qualities of the AONB.</p>	<p>Comments noted. As suggested wording will be added to Policy 17.</p> <p>Proposed action:- Comments noted and the following changes to the BNHP are proposed.</p> <p>Policy 3: Add a third criteria ...“there are no significant impacts in preserving dark night skies resulting from additional light pollution.”</p>

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			<p>Policy 6, criteria 11: add the following list of requirements..</p> <ul style="list-style-type: none"> a) fully shielded (enclosed in full cut-off flat glass fitments) b) directed downwards (mounted horizontally to the ground and not tilted upwards) c) switched on only when needed (no dusk to dawn lamps) d) white light low-energy lamps (LED, metal halide or fluorescent) and not orange or pink sodium sources. <p>Policy 7, criteria 2: Add to the end of sentence “.....coastline or the special qualities of the AONB”.</p> <p>6.132, 6.152 and 6,264 : Add “Norfolk Coast Partnership Landscape Character Assessment for the AONB” and “The Institute of Lighting Professionals, Guidance Notes for the Reduction of Obtrusive Lights” to the list of supporting documents.</p> <p>Policy 8: Add new criteria with the wording “will not detract from the AONB through scale, materials and design.”</p> <p>Policy 9: Add new criteria with the wording “will not detract from the AONB through scale, materials and design.”</p> <p>Policy 11: Add a new starting paragraph “Development must demonstrate how it delivers a ‘net gain’ in biodiversity and improves connections with existing.....”.</p>

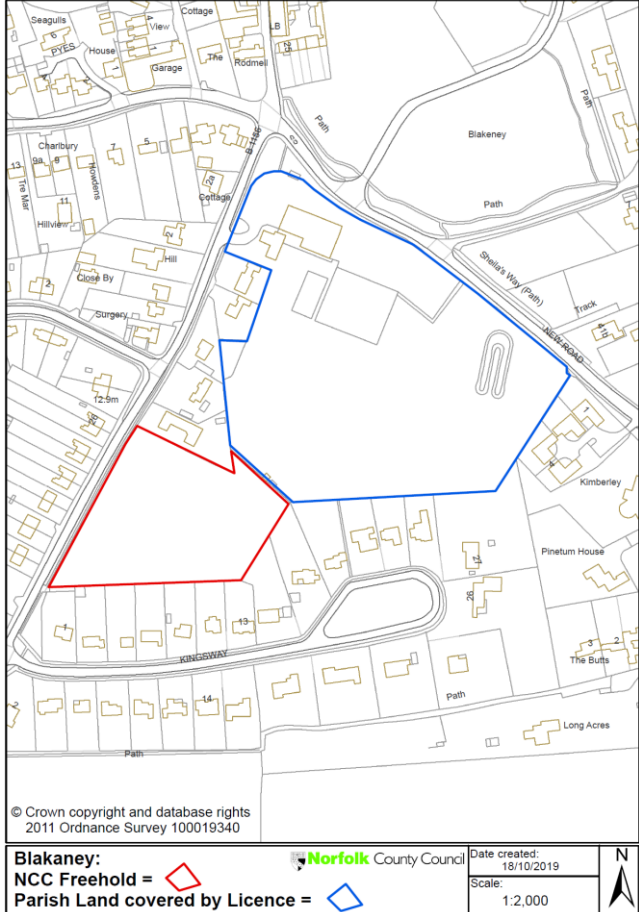
No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
			<p>Add to paragraph two "... supported (such as including provision of bird/bat boxes and native planting). Recommendations should be informed by an ecological survey undertaken by a qualified ecologist."</p> <p>Policy17: Add a fourth criteria "4. respect the special qualities of the Area of Outstanding Natural Beauty (AONB)."</p> <p>Appendix 2: Add "Norfolk Coast Partnership Landscape Character Assessment for the AONB" and "The Institute of Lighting Professionals, Guidance Notes for the Reduction of Obtrusive Lights" to the list reference documents.</p>
<p>PS/25 Norfolk County Council</p>		<p>1. Preface</p> <p>1.1 The officer-level comments below are made without prejudice, the County Council reserves the right to make to any further comments the County Council may have on future iterations of the emerging Neighbourhood Plan.</p> <p>1.2 The County Council welcomes the opportunity to comment on the emerging Neighbourhood Plan and recognises the considerable amount of work and effort which has been put into developing the Plan to date.</p> <p>2. General Comments</p> <p>2.1 The County Council supports the objectives set out in the Plan (page 21). In particular the County Council supports objective 4 and objective 5.</p>	<p>Thank you for your response.</p> <p>Comments noted.</p> <p>Comment noted, it is appreciated.</p> <p>Support noted.</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
		<p>3. Infrastructure Delivery</p> <p>3.1 The Plan could contain supporting text referencing the following;</p> <ul style="list-style-type: none"> • Housing and other development will be expected to contribute towards improving local services and infrastructure (such as transport, education; library provision, fire hydrant provision, open space etc.) through either the payment of a Community Infrastructure Levy (CIL); planning obligations (via an s106 agreement / s278 agreement); or use of a planning condition/s. • Norfolk Fire and Rescue Service advocates the installation of sprinklers in all new developments. Sprinklers have a proven track record to protect property and lives. It would therefore be helpful if the emerging Neighbourhood Plan could refer to the installation of Sprinklers in new developments. <p>4. Historic Environment</p> <p>4.1 It is noted that some consideration of the historic environment is made, in the Plan, through maps 8 and 9 (pages 75 and 76) and the text associated with them. Brief consideration is given built heritage, but no mention is made of below-ground archaeological remains of any kind. Some</p>	<p>Comment noted. Paragraph 8.5 sets expectation of development contributing towards local services and infrastructure. Further reference will be added to Section 5: Sustainable Growth and Development and Theme 1: Built Environment.</p> <p>Comment noted. The inclusion of 'sprinklers' as a policy requirement sadly cannot be justified – it could be seen to be overly onerous on a development, may impact viability and without any evidence to justify why this specific requirement is necessary for Blakeney Neighbourhood Area but not policy for any other area of Norfolk or UK.</p> <p>In recognition of Norfolk County Council's (NCC) request to refer to the installation of sprinklers this will be included in the supporting text for the Built Environment theme.</p> <p>Comments noted.</p>

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		<p>consideration is given to designated heritage assets, but only listed buildings are mentioned.</p> <p>The Guildhall is a scheduled monument, there is an additional scheduled monument within the parish of Blakeney.</p> <p>4.2 There are no specific policies relating to historic environment both in terms of built heritage and below-ground archaeological remains. Therefore, it is recommended that the neighbourhood plan should include more detailed consideration of designated and undesignated heritage assets of all kinds.</p> <p>4.3 It is recommended that the authors of the of the neighbourhood plan consult the Historic Environment Record (heritage@norfolk.gov.uk). The online version of the Historic Environment Record, Norfolk Heritage Explorer is partial dataset (extracted from the Norfolk Historic Environment Record) which is updated periodically and is therefore not suitable for use in the planning process. Even appropriately derived Norfolk Historic Environment Record data is not static and may be subject to change and enhancement within the lifetime (up to 2040) of neighbourhood plan. New discoveries are made, and existing sites and buildings can be reinterpreted. The implementation of new nationally or locally derived guidance and policies can lead to reassessment of the significance of individual or groups of heritage assets.</p>	<p>Comment noted. Historic England record the listing of the Guildhall as Grade II* (list entry number 1373987). It is the Medieval undercroft (known as the Guildhall) that is on the scheduled monument list (list entry number 1014237)</p> <p>Comments noted. The details are contained within the Blakeney Conservation Area Appraisal and Management Plan. Policy 6, criteria 3 sets the requirement of the historic environment and references the Blakeney Conservation Area Appraisal and Management Plan.</p> <p>Comment noted, thank you for highlighting this useful resource.</p>

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		<p>4.4 It is also recommended that the Historic Environment strategy and advice team are consulted (hep@norfolk.gov.uk). Advice can be provided as to which heritage assets are most significant and ways in which they can be protected and enhanced. Advice can be given to the wording of historic environment policies. At least one other neighbourhood plan in Norfolk has recommended that potential developers with concerns about how their development may affect the historic environment, should contact Norfolk County Council Environment Service historic environment strategy and advice team directly for pre-application advice to identify archaeological implications.</p> <p>5. Lead Local Flood Authority (LLFA) The LLFA welcome the inclusion of Policy 10 (page 66) in the Plan. References to surface water flooding have been made throughout the Plan with references to supporting documents.</p> <p>5.2 It is recommended the Norfolk LLFA Statutory Consultee Guidance for Planning Document: Version 4, March 2019 is referenced in Section 6.172 (page 67).</p> <p>6. Corporate Property Service 6.1 At present the land edged red on the plan, see appendix 1, is held by NCC's Children's Services portfolio and, in conjunction with the land edged blue, is used to provide the required playing field provision to the local school. Any disposal or development of either parcel should not be undertaken without the school's long-term access to</p>	<p>Comment noted. Will be added to Policy 6 as a new criteria.</p> <p>Comment and support noted.</p> <p>Comment noted. Thank you for highlighting this resource, reference to this supporting document will be added to paragraph 6.172 and Appendix 2.</p> <p>Comment noted. As the landowner the Local Planning Authority (NNDC) would expect you to be involved in, and agree to, any development proposals for this land. Please note that this is one of the areas identified in Policy 13 (Table 2, number 4).</p>

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		<p>a playing field being guaranteed in some way. If this can be achieved then NCC would wish this site to be used in the most appropriate manner to deliver the aims of the Neighbourhood Plan in relation to the social, economic and environmental needs of the village.</p> <p>7. Transport 7.1 The policies included in the Plan that promote the provision of adequate parking spaces is supported.</p>	<p>Comment and support noted.</p> <p>Proposed action:- Comments noted and the following changes to the BNHP are proposed:-</p> <p>5.3: Add following text “ Housing and other development will be expected to contribute towards improving local services and infrastructure, including contributions towards new infrastructure (such as transport, education; library provision, fire hydrant provision, open space etc.) through planning obligations and via a S106 agreement / S278 agreement or use of planning conditions.”</p> <p>6.95. Improving Design of Development: Add text to explain the additional criteria to Policy 6 recommended by Norfolk County Council.</p> <p>6.109: Add following text “Through planning obligations and via a S106 agreement / S278 agreement or use of planning conditions development will be expected to contribute towards improving local services and infrastructure, including contributions towards new infrastructure.”</p>

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		<p>Appendix 1 – Red line plan for Blakeney Playing Fields</p> 	<p>Policy 6: Add a new criteria to say.... “ It is recommended that pre-application advice is sought from the Norfolk County Council Environment Service Historic Environment Strategy and Advice Team to identify archaeological implications for any proposed development.</p> <p>6.130: Insert a new paragraph of text to say “Norfolk County Council’s response to the Pre-Submission Version of the Blakeney Neighbourhood Plan requested the inclusion of the following; Norfolk Fire and Rescue Service advocates</p> <ul style="list-style-type: none"> • The installation of sprinklers in all new developments. • Sprinklers have a proven track record to protect property and lives. <p>Therefore, the installation of sprinklers in new development is supported but is not a policy or planning requirement.”</p> <p>6.172: Add “Norfolk LLFA Statutory Consultee Guidance for Planning Document: Version 4, March 2019” to the list of supporting documents.</p> <p>Appendix 2: Add “Norfolk LLFA Statutory Consultee Guidance for Planning Document: Version 4, March 2019” to the list reference documents.</p>

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<p>PS/26 Historic England</p>		<p>Thank you for inviting Historic England to comment on the Regulation 14 Pre-Submission Draft of the Blakeney Neighbourhood Plan.</p> <p>We welcome the production of this neighbourhood plan, but do not wish to make any comments at this time.</p> <p>We would refer you to our detailed guidance on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here: https://historicengland.org.uk/advice/planning/planning-making/improve-your-neighbourhood/.</p> <p>For further advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult your local planning authority conservation officer, and if appropriate the Historic Environment Record at Norfolk County Council.</p> <p>To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.</p>	<p>Thank you for your response.</p> <p>Support and comment noted.</p> <p>Comment noted, thank you for highlighting this resource.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Proposed action:- Comments noted and no changes to the BNHP are proposed.</p>

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<p>PS/27 North Norfolk District Council</p>		<p>Blakeney Neighbourhood Plan - Pre submission Version (September 2019 Reg.14 v1)</p> <p>Thank you for consulting North Norfolk District Council on the pre submission draft Blakeney Neighbourhood Plan. Please find attached our detailed comments on the Draft Blakeney Neighbourhood Plan.</p> <p>We recognise the hard work and commitment that has gone into the production of the draft Neighbourhood Plan by the members of the Steering Group, Blakeney Parish Council and the Clerk.</p> <p>We all want to see a Plan that best reflects the aspirations of the community whilst fitting into the parameters of neighbourhood planning, gets through independent examination and will be effective in the longer term. However, as you will see from our comments, we have some significant concerns in relation to the evidential basis of the plan and a number of the policies.</p> <p>The comments are a detailed and comprehensive review of the emerging neighbourhood plan from across the Council's departments at the formal Regulation 14 stage of the Neighbourhood Planning (General) Regulations 2012 as amended. This stage</p>	<p>Thank you for your comprehensive and detailed response. It is appreciated the time and energy that North Norfolk District Council will help us make the Blakeney Neighbourhood Plan the best it can be, although the Steering Group found the tone and nature of the feedback disappointing.</p> <p>Comment noted. Thank you for recognising the level of work that has gone into the production of the Blakeney Neighbourhood Plan.</p> <p>Comment noted. However, the comments of North Norfolk District Council in their response does not match this statement. It is apparated that Officers of North Norfolk District Council do not understand the differing requirements of the Local Plan making process and neighbourhood planning. It is clear North Norfolk District Council are seeking to inappropriately influence the Blakeney Neighbourhood Plan to allocate additional residential development sites to make up for the noticeable shortfall of sites and housing numbers in the emerging Local Plan.</p> <p>Comment noted. In the spirit of good will and accepting that everyone is seeking to do the 'best they can' for the Blakeney Neighbourhood Plan we would draw to North Norfolk District Council's</p>

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		<p>requires formal comments in line with our professional and statutory role and the comments should be seen as a constructive attempt try to assist the Parish Council in finalising the plan in order to produce an effective Neighbourhood Plan for Blakeney in line with the stated aims and objectives. We want to make sure that the relationship with the Steering Group, going forward, is constructive and collaborative, and certainly want to encourage the Steering Group to continue their hard work and the commitment required to see the process through.</p> <p>We would welcome the opportunity to discuss the detailed response with the Parish Council and I also reiterate our willingness and openness to provide ongoing professional, informal and formal, assistance over the coming weeks and months.</p> <p>North Norfolk District Council response November 2019</p> <ol style="list-style-type: none"> 1. Thank you for consulting North Norfolk District Council (NNDC) on the pre submission Blakeney Neighbourhood Plan (the Plan). NNDC is the statutory Local Planning Authority (LPA) for the area and is a specific consultee. NNDC recognise the work and commitment 	<p>attention the words on page 10 of the Locality Policy Writing Guide by Tony Burton, where it states...</p> <p>"There are few absolutes and planning professionals and even Examiners have been known to have differing views."</p> <p>Comment noted and the opportunity to go through in detail would be welcomed. This detailed response from the Steering Group was sent to North Norfolk District Council with a request for meetings to discuss in detail.</p> <p>This is an opportune moment to remind North Norfolk District Council that the appointment of the examiner should be with the agreement of the Qualified Body – Blakeney Parish Council – who require the Examiner to be accessed through the Neighbourhood Planning Independent Examiner Referral Service (NPIERS)</p> <p>Thank you for your comprehensive and detailed response.</p>

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		<p>that has gone into the production of the Plan by members of the Steering Group, Blakeney Parish Council and the Clerk.</p> <ol style="list-style-type: none"> <li data-bbox="640 389 1279 746">2. The comments below form officers' review of the emerging neighbourhood Plan from across the Council's departments at regulation 14 stage of the Neighbourhood Planning (General) Regulations 2012 as amended. This stage requires formal comments in line with our professional and statutory role and should be seen as a positive attempt try to assist the Parish Council in finalising the Draft Plan in order to produce a final Plan for the parish. <li data-bbox="640 783 1279 978">3. We want to see a Plan that best reflects the aspirations of the community whilst fitting into the parameters of neighbourhood planning, meets the required basic conditions tests at independent examination and will be effective in the longer term. <li data-bbox="640 1209 1279 1401">4. The commentary and advice contained in the response is drafted in such a way as to make sure the emerging Plan faces less challenge at examination, has the best chance of being adopted and will stand the test of time. 	<p>Thank you for recognising the time and effort the local community have put in to produce the Regulation 14 Pre-Submission Draft Blakeney Neighbourhood Plan.</p> <p>Comments noted. Although there are a number of areas where Officers, in their response, have 'strayed' beyond the scope of their roles within the neighbourhood planning process and regulations.</p> <p>Comments noted. Despite the tone and positioning of many of the comments the Steering Group have taken the points raised in a constructive and positive frame, each comment will be considered and used to shape and inform the Examination version of the Blakeney Neighbourhood Plan.</p> <p>Comments noted. Thank you to North Norfolk District Council (NNDC) for their helpful remarks that will help to improve the policies of the Blakeney Neighbourhood Plan to deliver better outcomes over the lifetime of the Blakeney Neighbourhood Plan. The Basic Conditions Report, one of the supporting documents that will be submitted with the Blakeney Neighbourhood Plan, will comprehensively detail how and where each of the Blakeney Neighbourhood Plan policies meet the basic conditions – as defined by the Neighbourhood Planning Regulations.</p> <p>Comment noted.</p>

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		<p>5. We highlight a number of concerns in relation to the evidence base of the Plan and officers would like to work with the steering group to ensure your evidence provides the basis for a truly effective Plan for Blakeney.</p> <p>We would like to work with you on setting a housing target and expanding the evidence base on local need.</p> <p>6. We believe a number of the aspirations and objectives of the Plan could be achieved by allocating a site in Blakeney for housing growth. We understand this is a difficult, controversial and complex process, however, we want to support you in this process, if you choose to undertake it.</p> <p>7. We would like to discuss the detailed response with the Parish Council and also reiterate our</p>	<p>Comments noted. The concerns raised in NNDC's comments will be addressed through the responses given against each concern as raised later in NNDC's comments.</p> <p>Comment noted. However, NNDC has chosen not to follow Government requirement of using a standard methodology, instructions and guidance in the calculation of the District wide housing need for the emerging Local Plan (as set out on paragraphs 9.11 to 9.21 of First Draft Local Plan (Part 1)) and, as a result, is in serious risk of the emerging Local Plan being found 'unsound' at its examination. Therefore, there is little confidence in any housing target set by NNDC.</p> <p>The Blakeney Neighbourhood Plan, following discussions with NNDC, does not seek to allocate sites for development, as NNDC is progressing the emerging Local Plan within which local sites put forward by landowners and agents in the 'call for sites' process will be assessed. The community of Blakeney accept there is a need for growth but would like to see the delivery of homes that are affordable to local residents.</p> <p>Comment noted. Please see comment above regarding site allocations, which the Blakeney Neighbourhood Plan does not seek to do. Your comment is contra to your previous advice.</p> <p>Comment noted. The Steering Group would welcome the opportunity to meet and discuss the</p>

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		<p>willingness to provide ongoing professional support and to undertake a number of informal workshops or meetings with the steering group based around topic areas.</p> <p>Section 1: Overarching comments to the Plan Overview</p> <p>8. We fully support the production of neighbourhood plans, believing that when combined with other elements of the Development Plan, they can be effective in addressing local issues and help shape growth to meet local community needs in a way that the strategic nature of the Local Plan cannot. As such they provide the opportunity to add much local distinction, positivity and direction in order to help a neighbourhood grow.</p> <p>9. We recognise that much hard work has gone into the production of the Blakeney Plan and are supportive of many of the underlying principles of what the Parish Council is trying to achieve.</p> <p>However, in examining the Plan and the policies there are some significant concerns which go back to the heart of neighbourhood planning process that, in officers' professional</p>	<p>District comments, as per the previous workshop held in July 2019.</p> <p>Comments noted. It is good to hear that North Norfolk District Council and its Officers are fully behind neighbourhood planning and the way it can apply policies at a local and lower level in far more detail than the Local Plan.</p> <p>The draft policies in the Blakeney Neighbourhood Plan will make a difference to the community and the look and feel of the village for many years. Taking on such issues as second home ownership, giving priority to people with local connect to affordable homes, preserving and enhancing both the built and natural environments, keeping our dark skies dark and promoting local economy and jobs.</p> <p>Comments noted. Thank you to North Norfolk District Council and its Officers for their support and input in the production of the Blakeney Neighbourhood Plan - recognising the ambitions of the local community and what it is trying to achieve.</p> <p>Comments noted. These specific concerns will be taken onboard and addressed as they are raised later in this response. We ask that Norfolk District Council and its Officers listen to and understand the ambition of our policies. The Blakeney</p>

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		<p>opinion, need to be taken on board in order to produce a meaningful and effective Plan.</p> <p>10. Many of these comments will come as no surprise and have previously been raised – but have not been taken on board in the finalisation of this consultation document. Taken as a whole we are of a view that with the Plan, as presented, there is real danger that it will not pass the scrutiny of independent examination based on the circumstances of Blakeney or be effective in addressing the stated aims without significant deletion, and amendment.</p>	<p>Neighbourhood Plan is following the neighbourhood planning process as set out in the regulations and guidance. The content of the policies is not new and can all be found in other adopted 'made' Neighbourhood Plans, while specific application to Blakeney is demonstrated for each policy through the appropriate evidence and justification.</p> <p>Comment noted. Through previous discussions and meetings, the Steering Group had understood that North Norfolk District Council and its Officers were in agreement with the content and draft policies in the Blakeney Neighbourhood Plan.</p> <p>We would like to remind North Norfolk District Council and its Officers of our earlier conversations and the differing requirements of neighbourhood planning and the application at a neighbourhood level to those of the emerging Local Plan that is applied across the District, especially with regard to appropriate evidence and justification required.</p> <p>The Steering Group have looked at many 'made' adopted Neighbourhood Plans to seek policy ideas and to see how these policies can be used at a neighbourhood level to build sustainable communities. Having seen these policies, many similar to those in the Blakeney Neighbourhood Plan, successfully pass examination the Steering Group are confident that they are appropriate and been tailored to Blakeney with the supporting justification and evidence needed.</p> <p>Comments noted. The policies within the existing Core Strategy have been reviewed and considered</p>

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		<p>11. In taking the Plan forward we strongly recommend that a review of existing Local Plan policies takes place followed by the commissioning of significantly stronger supporting evidence base (with an appropriate review and consideration of the evidence) in order to inform potential policy options. Throughout this response, potential solutions are outlined which would allow officers to be more supportive towards the Plan and we would encourage the Parish Council to give serious consideration to them going forward.</p> <p>12. Plans should to be ambitious, but realistic, and a level of honesty and realism is required around the recognised cumulative influence any Plan will have on development in the parish. Consideration needs to be given to the cumulative effects of all the policies combined as well as the effects of individual policies. There is little, to no point, in promoting a policy if the level of influence it has (irrespective of the supporting evidence) is trivial and/or has the potential to limit development.</p>	<p>in the formation of the Blakeney Neighbourhood Plan. As have the policies in the emerging Local Plan, which the Blakeney Neighbourhood Plan needs to be mindful of at this time and give them due consideration.</p> <p>The evidence base for the Blakeney Neighbourhood Plan is comprehensive and published in the Blakeney Baseline Date (November 2018) document. This information and evidence has been used to inform the Blakeney Neighbourhood Plan and, it so instances, included with the Plan itself.</p> <p>Comments noted. It is sad that NNDC feel this way. The Blakeney Neighbourhood Plan seeks to address some serious issues the village will face in the future if it is to thrive and prosper while growing as a sustainable community. Many of these issues NNDC has chosen to not take action on in the emerging Local Plan – such as 'second home ownership' - with the result that vast sways of the housing stock stands empty for large periods of the year.</p> <p>The Blakeney Neighbourhood Plan is realistic about the level of impact it can have but the community of Blakeney have decided that it wants to do something to start to address these issues – such as the impact of second home ownership and affordability – within the scope of the planning process and reach of the Blakeney Neighbourhood Plan. Such as affordable homes for householders with a local connection to Blakeney.</p> <p>Blakeney is a small village and, therefore, when outcomes are measured some may only be small</p>

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		<p>13. Though you may find much of this response critical, the comments are designed to be informative, constructive and supportive in the production steps ahead of the final submission and prior to independent examination.</p> <p>14. Overall, the emerging Plan as presented reflects a missed opportunity to define and refine development proposals in Blakeney in order to add a level of local distinctiveness in the way expected by the government through neighbourhood planning.</p> <p>We draw your attention to two neighbourhood plans, Coggeshall and Stadbroke, both of which set out a clear structure and ambition, set out positive policies justified by appropriate evidence and provide a framework for planning, which if followed provide good examples of what can be achieved and how to manage the production of a neighbourhood plan.</p>	<p>(when compared to the District). It is felt by the community that any small positive outcome is a success and better than not taking the opportunity and doing nothing.</p> <p>Comments noted. It is felt that the comments are very negative and, in some cases, do not represent the neighbourhood planning process or Localism Act. All comments have been considered and used to inform the development of the Blakeney Neighbourhood Plan.</p> <p>Comments noted. Our view differs from that of NNDC. The community of Blakeney have embraced the neighbourhood planning process and seen it as an excellent opportunity to express what is important to them. There has been much discussion and drafting and re-drafting of policies - the seventeen policies in the Blakeney Neighbourhood Plan will, over the plan period to 2040, make a difference to achieving the goal of a sustainable community.</p> <p>Comment noted. It is assumed you mean Stradbroke Neighbourhood Plan as we have not been able to find any "Stadbroke" Neighbourhood Plan. We thank you for pointing out these two good Neighbourhood Plans although we must point out neither are coastal villages and therefore, their Visions and Objectives are significantly different.</p> <p>Comments noted. Thank you for informing of the process. All responses will be recorded within the Consultation Statement, which will be one of the</p>

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		<p>15. It will be up to the Parish Council as the Qualifying Body to review these and other comments received to inform the production of the final plan. A schedule of all comments received and the actions flowing out of them should form part of the required consultation statement at submission stage and be used in a constructive and positive way to demonstrate how the feedback has helped inform the final version of the Plan ahead of independent examination.</p> <p>16. On reviewing the material made available for the consultation, it is noted that there are numerous individual and overarching issues that run throughout the document which raises significant concerns around compliance with government legislation on plan making. To address these concerns, in taking the Plan forward, the Parish Council may wish to consider the other areas of professional support that are available. In addition to further officers' support, Locality (as the national group funded to provide external support for neighbourhood planning) not only provide key neighbourhood planning guidance documents but also offer best practice advice and additional technical planning support through AECOM .</p>	<p>supporting documents to the Blakeney Neighbourhood Plan when submitted, with the comments, considerations of the Steering Group and any actions or changes detailed.</p> <p>Comments noted. As each issue has been raised in NNDC's comments it will have a response that addresses that issue. This could result in an amendment to the next version of the Blakeney Neighbourhood Plan (in which case it will be detailed in the text of the response and listed at the end of all the responses) or that the Steering Group have a different view to NNDC and no change will be necessary – drawing NNDC's attention again to the words on page 10 of the Locality Policy Writing Guide by Tony Burton</p> <p><i>"There are few absolutes and planning professionals and even Examiners have been known to have differing views."</i></p> <p>Comments noted. Locality have provided support to the Blakeney Neighbourhood Plan, their guidance and resource materials have been used throughout the development of the Blakeney Neighbourhood Plan – Locality's Writing Planning Policies document has been very useful helping with such things as Policy 1 Affordable Homes for Local People and Policies 6 and 7 improving the design of development and homes.</p>

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		<p>17. Officers have concerns that the basic conditions have not been met in relation to:</p> <p>1. A misunderstanding of planning, planning law and the neighbourhood plan process: including basic conditions test, scope of land use planning/ focus on non-land use planning matters, failure to include a housing target for the application of housing policies, suitability of some of the approaches chosen & the inadequateness of methodologies used and screening requirement for environmental effects</p>	<p>Comments noted, although the neighbourhood planning process has been followed – as outlined in Locality's Road Map support resource.</p> <p>It is not for NNDC to pick and choose which policies the Blakeney Neighbourhood Plan should take to a lower level and apply in more detail at a neighbourhood level rather than being constrained, as NNDC are, with policies that have to apply across the entire district.</p> <p>As previously stated above, the Blakeney Neighbourhood Plan does not seek to allocate site for development (on earlier advice received from NNDC) and is leaving it for the emerging Local Plan to do this, therefore, housing target is not needed. Although, there is a duty on NNDC to provide one.</p> <p>It had previously been agreed that NNDC would undertake the production of the Strategic Environmental Assessment (SEA) and Habitat Regulation Assessment (HRA) to support the Blakeney Neighbourhood Plan. Due to a 'mix-up' NNDC did not receive the request for these to be completed to support the Regulation 14 consultation. The Statutory Bodies have not raised this as an issue. It has been subsequently agreed with NNDC, since the Pre-Submission consultation has finished, that the SEA and HRA will be undertaken on the Examination version of the Blakeney Neighbourhood Plan, as this will include any modifications and changes.</p>

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		<p>2. A significant lack of evidence, lack of objectiveness in presentation and justification to support approaches including;</p> <p>a. the significant reproduction of large parts of other Made Plans without the appropriate review and locally derived evidence informing and supporting the approach.</p> <p>b. Misinterpretation of the limited evidence</p> <p>3. Ambiguity, duplication, conformity and repetition issues, both between policies and also with statutory plans;</p> <p>4. The long term effectiveness of policies and their ability to address the issue raised.</p> <p>18. There remains a significant amount of unnecessary duplication and repetition, lack of clarity, conformity with other development plan policies which if not addressed will also</p>	<p>Comments noted and we would again draw your attention to the comprehensive evidence base for Blakeney contained in the Blakeney Baseline Date (November 2018) document. This information and evidence has been used to inform the Blakeney Neighbourhood Plan and, in so instances, included with the Plan itself.</p> <p>Comment noted. This is not the case. Where appropriate policies have been located in other made Neighbourhood Plans the justification and evidence has been found and applied for Blakeney.</p> <p>Comment noted. Again, we would disagree, the explanation within the supporting text for each policy clearly sets out how the evidence has been used and applied.</p> <p>Comments noted. Do not believe this is the case. Hopefully will be addressed through individual comments later in your response. However, will review all policies accordingly.</p> <p>Comments noted.</p> <p>Comment noted. Do not believe this is the case, please see comment above. The Blakeney Neighbourhood Plan has a plan period to 2040, four years longer than the emerging Local Plan. The emerging Local Plan will not supersede the Blakeney Neighbourhood Plan, instead they will be</p>

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		<p>inevitably limit the shelf life of the neighbourhood plan as they will be superseded by the emerging Local Plan.</p> <p>19. It is advisable to go back to basics, seriously reconsider the scope and evidence base required and to allow this evidence inform the policy choices rather than seeking to make a policy fit into a preconceived outcome. The starting point should be a review of the existing Core Strategy and emerging Local Plan for conformity issues (see our guidance note).</p>	<p>complementary as part of the Development Plan. With the emerging Local Plan applying to the entire District, including Blakeney, while the Blakeney Neighbourhood Plan will just apply to the Blakeney Neighbourhood Area.</p> <p>Comments noted. However, we must point out your suggested approach is how the Blakeney Neighbourhood Plan has been development – starting with the Vision and Objectives, identifying themes and reviewing evidence to support the developing policies. Each stage has involved the engagement of the local community who have been shown the results of previous consultations and asked to share views, ideas and comment as the Blakeney Neighbourhood Plan has been developed. It would seem NNDC does not like some of the policies within the Blakeney Neighbourhood Plan, but this is not a reason not support the local community in their aspirations and the adoption of policies that will make a real local difference to existing and future residents of Blakeney.</p> <p>The Blakeney Baseline Date document contains information and evidence, much of which NNDC has helpfully provided.</p> <p>The conformity of the Blakeney Neighbourhood Plan will be demonstrated in the Basic Conditions Report which undertakes a comprehensive review of the adopted policies of the Core Strategy and emerging Local Plan.</p> <p>Comments noted.</p>

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		<p>20. The comments provided are substantial and detailed, however, in an attempt to minimise repetition, this section seeks to cover many of the high level and cross cutting issues followed by advice on how the plan could establish itself on a sound footing. In section 2 more detailed comments are given on each section and individual policies.</p> <p>Previous feedback</p> <p>21. Although some policy wording has been amended officers' remain concerned that our previous detailed written advice provided on the emerging plan (in March 2019 and at a subsequent meeting on 25th March 2019 with the steering group) has not been adequately considered and incorporated into the production of this consultation document. As such the emerging Plan continues to project fundamental flaws into the community consultation in such a way that can only mislead the general public and consequently dilute the effectiveness of the consultation exercise.</p> <p>Policy considerations</p>	<p>Comments noted. It is disappointing that officers feel this way. It was appreciated the time and effort that officers put into the meeting on 25th March and subsequent workshop on 5th July 2019.</p> <p>At these productive sessions the points raised by NNDC were discussed and an agreed understanding and approach was agreed, with the Blakeney Neighbourhood Plan being updated accordingly.</p> <p>The community engagement has been inclusive and reached out to all who wanted to be involved. The events have been well supported and the Steering Group meetings are open to the community, with local residents attending the meeting in December 2019.</p> <p>Hopefully you will detail later in your response the "fundamental flaws" to enable us to look into these and take any corrective action necessary.</p> <p>Comments noted.</p>

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		<p>National Policy</p> <p>22. Overall neighbourhood planning provides a powerful set of tools for local people to plan for the types of development to meet their community's needs, develop a shared vision for their neighbourhood and shape the development and growth of their local area. In neighbourhood plans the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area, which is set out through the Local Plan. The Council is supportive of neighbourhood planning and recognises that the production of a neighbourhood plan can be daunting and there are many issues to consider, however, it remains a formal planning document guided by prescribed legislation and which must undergo independent examination.</p> <p>23. The neighbourhood plan must comply with basic condition tests which include national and local policy considerations, European legislation requirements and equality law compliance. In doing so a Plan is required to have appropriate justification and we cannot stress enough that throughout the production of the Plan, the Parish Council should take the council up on its offer to provide continued and constructive guidance.</p> <p>24. The basic conditions tests are not repeated here as you will no doubt be familiar, however the National Planning Practice Guidance</p>	<p>Comments noted.</p> <p>Comments noted.</p>

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		<p>(PPG) provides comprehensive web based guidance for the planning system which all Plans and Programmes should be in general conformity with. In many cases the guidance adds detail and interpretation of the National Planning Policy Framework, NPPF, and clarity to the interpretation of the basic condition tests. There is a specific section for neighbourhood planning in the guidance which also links to relevant parts of other guidance such as plan making which details the use of evidence further. Other sections cover the use and limitations around planning obligations which covers such items as affordable housing contributions and the parameters of s106 agreements. These guidance documents cover many of the topics that are to be covered in the emerging the Plan.</p> <p>25. It is strongly recommended that the neighbourhood planning section of the PPG and the locally specific and detailed guidance documents produced by NNDC (see below) are reviewed and taken into consideration in future versions of this emerging neighbourhood plan.</p> <p>Planning Guidance</p> <p>26. NNDC have produced a suit of additional guidance aimed at supporting local communities in North Norfolk undertaking neighbourhood planning. These are based around specific check sheets and frequent</p>	<p>Comment noted.</p> <p>Comment noted. Thank you for highlighting these resources which have been used in the development of the Blakeney Neighbourhood Plan.</p>

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	Policy 1	<p>topics that town and parish councils have sought guidance on. They are designed to provide guidance on how neighbourhood planning groups can reflect local circumstances and develop policies that are justified and evidenced in a positive and realistic way, which if followed will provide more certainty at examination and provide an effective policy base to inform decisions. These guides are updated from time to time and can be found on the Council's web site: https://www.north-norfolk.gov.uk/section/planning/planning-policy/neighbourhood-planning/</p> <p>27. In addition, those producing neighbourhood plans should refer to and obtain an understanding of the National Planning Practice Guidance which provides the government's guidance and parameters around neighbourhood planning: https://www.gov.uk/government/collections/planning-practice-guidance.</p> <p>Detailed comments on the approach outlined in the Plan Affordable Housing & Local Connection</p> <p>28. The Council have consistently advised the Steering Group that the statutory occupation of housing sits outside the scope of the neighbourhood plan and land use planning. It is wrong to suggest that neighbourhood plans can set policies that determine who gets priority in occupation and which housing provider should supply the properties.</p>	<p>Comment noted.</p> <p>Comments noted. This policy was covered at length in the meeting with NNDC on 25th March 2019. It was explained that a large number of made Neighbourhood Plans contain this policy, (such as Lynton and Lynmouth Neighbourhood Plan and Woodcote Neighbourhood Plan).</p> <p>Writing Planning Policies document (published by Locality as part of their resource support) says on page 19 "<i>Homes for locals - this is one of the most frequently addressed topics in neighbourhood</i></p>

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		<p>Furthermore, the Plan should not seek to misrepresent planning officers and imply a level of support that is not there. Inaccurate references contained in the document should be removed.</p>	<p><i>planning. The process of allocating social housing is a matter for housing management and not planning policy but requirements can be managed by legal agreement. It can be a complex area and one where it is well worth talking to the local authority housing team to avoid any risk of conflict with EU rules around free movement. The question of who qualifies for access to such housing and how the 'local connection' is defined has been dealt with in different ways".</i></p> <p>In discussion with NNDC's Officer, Housing Strategy & Delivery Manager, at the meeting on 25th March 2019 he agreed that that Policy 1 of the Blakeney Neighbourhood Plan would be able to work and be complementary to NNDC's Housing Policy. In fact, he stated that the numbers (of affordable homes coming forward in Blakeney) being so small as to not have a significant impact on the overall policy of the District.</p> <p>This resulted in the draft Policy 1 being amended from a proportion of affordable homes being made available to local people first to all affordable homes now being available.</p> <p>The view expressed by the Officer, Housing Strategy & Delivery Manager, was confirmed in his email dated 12th September 2019 which finished with the words....</p> <p><i>"This is my own view and is not the policy as outlined above. I think I made the point in relation to the suggestion to make some affordable housing on an allocated site for local priority. In my view the</i></p>

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		<p>29. For those neighbourhood groups who wish new housing to go to those with a connection to the parish it should first be noted that the existing countryside policy and rural exception site development policies that exist in the Core Strategy and emerging Local Plan already do this.</p> <p>30. Countryside development for affordable housing in perpetuity in association with a specific neighbourhood connection is allowed through Core Strategy policy HOU3, HOU5 and the emerging Local Plan policy HOU3 and HOU4. In such cases preference is already given to those with a connection to the parish.</p>	<p><i>numbers being so small as to not have a significant impact on the overall policy."</i></p> <p>Comment noted. It is the same flexibility in the Housing Policy that enables this to happen for exception sites that is used by many made Neighbourhood Plans with similar policies as Policy 1 of the Blakeney Neighbourhood Plan.</p> <p>Exception sites are a very good way of delivering affordable homes through small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. Small numbers of market homes may be allowed at the local authority's discretion, for example where essential to enable the delivery of affordable units without grant funding. At this time landowners are extremely reluctant to release land for exception sites as the emerging Local Plan is incomplete and does not allocate sufficient sites to meet the District identified need. There is a need for more sites to be allocated across the District.</p> <p>The status of the 5-year housing supply is an issue and while the April 2019 NNDC statement on the 5-year housing supply states 5.73 years this is based on NNDC not following the national standard methodology when assessing the local need for new</p>

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		<p>For all other developments affordable housing occupation is determined by the strategic housing policies of the Council in line with the government's reasonable preference criteria and choice based lettings scheme. This is a statutory requirement that applies to all development and includes the strategic site allocations in the Local Plan. This will take precedent over the parish council's aspiration for seeking priority to be given for those with a locally defined connection through the neighbourhood plan.</p>	<p>homes. This has resulted in a reduction in the identified need for the District.</p> <p>If the national standard methodology was applied then the identified need would be 2,905 over the five years, resulting in a 5-year housing supply of only 4.7 years (paragraph 4.8 North Norfolk District Council Five-Year Supply of Housing Land 2019-2024 (April 2019)). Without a 5-year housing supply the District is at risk of predatory planning applications on sites it may not support.</p> <p>Both of these points mean landowners are holding on to their land as the opportunity still exists for them to realise a bigger financial reward for their asset than would be achieved through exception site development.</p> <p>Comments noted. Refer to the response given above (28) the Housing Strategy & Delivery Manager, at the meeting on 25th March 2019, confirmed that once the Blakeney Neighbourhood Plan is made, that Policy 1 of the Blakeney Neighbourhood Plan would then be applied in the first instance to all affordable homes – including those on any strategic sites – and, secondly, if not taken up the NNDC Housing Policy would be applied.</p> <p>Comment noted. Please see earlier responses above which demonstrate this statement made by NNDC is incorrect.</p>

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		<p>31. A neighbourhood plan group seeking to add further local connection criteria outside of the statutory policy would not only be contrary to the Councils allocation policy but also contrary to the legislation to which Local Authorities must conform to. For case history, please see the Inspectors report into the Corpusty & Saxthorpe Neighbourhood Plan where a similar approach was deleted at examination.</p> <p>32. As written the Plan misinterprets and misleads its readers and it needs to be recognised and explicitly stated that in national policy there are affordable housing thresholds below which no affordable housing can be asked for, as well as percentage requirements in the Local Plan.</p>	<p>In the Corpusty & Saxthorpe Neighbourhood Plan CA1 was not written as a policy, but instead as a “Community Aspiration”. As an aspiration it was poorly positioned and as the Examiner stated not appropriate.</p> <p>This is completely different to the approach taken in Policy 1 of the Blakeney Neighbourhood Plan that is similar to the policy approach taken in many other made Neighbourhood Plans that have affordable homes for local people.</p> <p>Comment noted. The Blakeney Neighbourhood Plan clearly sets out the likely number of affordable homes that will be available based on the emerging Local Plan housing allocations and the Core Strategy policy requirements. This is not misleading.</p> <p>The Blakeney Neighbourhood Plan does not seek to set affordable housing percentages as these would duplicate or be in conflict with those set in NNDC's Core Strategy.</p> <p>In paragraphs 6.12, 6.30 and 6.40 the Blakeney Neighbourhood Plan references the current policy requirement of Policy HO2 of the NNDC's Core Strategy for the provision of affordable homes.</p> <p>The current policy requirement of 50% affordable homes within any new development (of ten or more new dwellings) – Policy HO2 of NNDC's Core Strategy.</p> <p>In the emerging Local Plan Blakeney is identified as being in 'Affordable Zone 2' and the requirement will</p>

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		<p>Clarity needs to be given around the expectations and the numbers of affordable homes the plan expects to deliver and further consideration given to the effectiveness of the approaches in achieving the ambition.</p> <p>33. It is true that the Blakeney Housing Association has agreed its own lettings policy with the Council. This housing society is a community initiative that provides for small scale and very local needs by operating on a small geographical scale. As such North Norfolk District Council has agreed with the Association that they can apply specific allocation policies provided that the policy comply with equalities legislation and that they are operating in the specified area.</p> <p>34. It should be noted that these local societies can purchase land and build in the relevant communities but neighbourhood plans should not seek to write policies that favour them as housing providers over others or prevent other</p>	<p>be different once the emerging Local Plan is adopted - as the draft Policy HOU 2 requires at least 35% affordable homes on development (of six or more new dwellings). It is not appropriate to mention this change in the Blakeney Neighbourhood Plan as it isn't current policy and may be revised in future versions of the emerging Local Plan.</p> <p>Comment noted. Please see response at (31) above, Affordable Home for Local People is not an "aspiration" of the Blakeney Neighbourhood Plan – it is a policy – and aligns to its Objective 3 and Vision of ".....supporting a vibrant and sustainable community."</p> <p>Comment noted. The activities of the Blakeney Neighbourhood Housing Association are supported by the local community. Your comments also seem contra to those made above in (31). Agreeing a different policy with Blakeney Neighbourhood Housing Association illustrates what has been done in other made Neighbourhood Plans is also appropriate for Policy 1 of the Blakeney Neighbourhood Plan and will deliver affordable homes for local people.</p> <p>Comment noted. It is incorrect and outrageous of you to infer the Blakeney Neighbourhood Plan seeks to favour any housing providers – it does NOT.</p> <p>The affordable housing resulting from policies in the Core Strategy and the emerging Local Plan would, as we understand it, need to be delivered through a registered provider (which the Blakeney Housing</p>

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		<p>providers from operating. Neighbourhood plans should therefore not seek to replicate such business models or criteria in policies. It goes without saying that where any housing is provided by such a local housing society its specific nomination criteria would be applied.</p> <p>35. By seeking to provide housing to those with a local connection across the parish, at the expense of those in general need, such an approach does not comply to equality legislation and conflicts with the Council's statutory duty in accordance with its responsibilities under separate Housing legislation. Therefore, Policy 1 has no grounds for inclusion in the Plan.</p> <p>36. The Plan is also seeking restrictive letting policies on windfall development and as such the steering group need to be aware of the policy restrictions in national guidance where thresholds apply to the provision of affordable housing along with the potential to conflict with the strategic approach of the Council which in part is reliant on a windfall allowance to achieve its housing target for market housing. This is particularly relevant to the Plan as no additional growth is being brought forward through the neighbourhood plan to</p>	<p>Association is not) many of which across Norfolk are familiar in operating where there is a local policy for allocation (such as Policy 1 of the Blakeney Neighbourhood Plan), whether at district level, neighbourhood level or on exception sites.</p> <p>Comments noted. Please see earlier responses (28 and 30) the NNDC's responsible officer, the Housing Strategy & Delivery Manager, has already confirmed that this approach works because of the built-in flexibility of the NNDC's Housing Policy and is not in conflict (due to the relatively small numbers involved). This has already been in operation for a number of years in at least two other Norfolk District Councils, as well as the large number of other made Neighbourhood Plans across the country. There is no reason why it cannot be applied in Blakeney as part of its Neighbourhood Plan.</p> <p>Comments noted. Policy 1 of the Blakeney Neighbourhood Plan, once made, would apply to all development in the Blakeney Neighbourhood Area.</p> <p>Please see earlier response above (32), the requirement for affordable homes is currently set by the NNDC's Core Strategy and in the future will be set by the emerging Local Plan. Not by the Blakeney Neighbourhood Plan.</p> <p>This is a misrepresentation of Policy 1 of the Blakeney Neighbourhood Plan as this policy will have no effect on the delivery of housing, market or otherwise.</p> <p>It does raise further concern and weakness in the approach taken in the emerging Local Plan if it is</p>

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		<p>address the identified local need or a housing target set for the plan.</p> <p>As such the Plan is not positively prepared and in conflict with the strategic approach set out in the Core Strategy and emerging local Plan and also fails to adhere to national guidance.</p>	<p>reliant on windfall development to achieve its target numbers – let's hope it passes its examination when it reaches that stage to 2021.</p> <p>Please see earlier responses above (26, 30 and 35) made by NNDC's Housing Strategy & Delivery Manager who recognised that this isn't an issue due to the relatively small numbers likely to be involved.</p> <p>Emerging Local Plan, paragraph 7.20 outlines why the emerging Local Plan (part1) "seeks to focus most of the required growth within and closely related to the defined Large and Small Growth Towns and a small number of Selected Villages. This approach will help to secure the delivery of Sustainable Development because", six criteria are then listed with number three being..</p> <ul style="list-style-type: none"> • "these locations have high levels of need for affordable homes and allowing development here will enable the delivery of more affordable homes where they are most needed" <p>Therefore, Policy 1 of the Blakeney Neighbourhood Plan is positively prepared, there is no conflict with current policy in the Core Strategy or future policy in the emerging Local Plan – in paragraph 7.24 of the emerging Local Plan it states ... " these communities (<i>Blakeney is included in the list</i>) have affordable housing needs and the Council believes these should be addressed locally provided such proposals are modest in size and do not result in harmful impacts."</p> <p>Comment noted. Thank you for highlighting the reference resources.</p>

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		<p>37. Further explanations on planning obligation thresholds is contained in the housing section of the emerging Local Plan and is also contained in the PPG and more detail on these issues and other housing matters including the approach to general needs housing and exception site are explained fully in the Council's Neighbourhood Plan Guide to Housing .</p> <p>38. There are opportunities outside the neighbourhood planning process where communities can identify and progress affordable housing sites with the support of the Council's Housing Enabling team through community-led housing. Detailed discussions have already been had and continue between the parish council, community enabling officers and housing providers round the opportunities of this approach in Blakeney and it is surprising that the plan remains silent on these and does not seek to develop a joined up strategy.</p> <p>39. Community-Led Housing organisations can own and manage homes and the land they stand on. The community benefits are clearly legally defined and protected for the community now and into the future. E.g. community land trusts principals offer a way of providing genuinely affordable housing in perpetuity, where the assets are held in trust for the benefit of the community. This method</p>	<p>Comments noted, NNDC's Local Housing Enabler Officer has already provided definitions and exact numbers that have been included in the Blakeney Baseline Data document and Blakeney Neighbourhood Plan.</p> <p>Comments noted, although as you have stated this is beyond the scope of the Blakeney Neighbourhood Plan.</p> <p>Comment noted. As per earlier response Blakeney Neighbourhood Plan does not seek to allocate additional housing.</p> <p>Comments noted.</p>

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		<p>seems more closely aligned to the ambitions of the parish council, where a local letting approach could be explored with the Council separately as a housing provider in its own right or in partnership with Blakeney Housing Society.</p> <p>40. As a way forward in achieving more affordable homes and to meet the needs of both the District and locally identified need through the NP we would advise that the policy approach currently outlined in the Plan is not the correct way to realise the ambition.</p> <p>We would encourage, and be supportive, of the Parish Council if it sought a more joined up approach - using the community housing led approach, to deliver its housing ambition and using the neighbourhood plan to identify and allocate suitable land. The approach should be set out an appropriate, justified and deliverable housing strategy.</p> <p>41. A number of potential sites have previously been identified both by the Parish Council and the local planning authority, LPA. These could be further refined through the neighbourhood planning process where more certainty could be provided in meeting the community's aspirations and expectations by allocating appropriately assessed sites. Many of these sites have already been assessed as part of the Local Plan process and officers can provide an assessment framework and further advice on how to undertake site</p>	<p>Comments noted. The Policy approach is correct and has been successfully achieved by many communities in their made Neighbourhood Plans.</p> <p>Comment noted. As per earlier responses Blakeney Neighbourhood Plan does not seek to allocate additional housing.</p> <p>Comment noted. As per earlier responses Blakeney Neighbourhood Plan does not seek to allocate additional housing.</p>

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		<p>appraisal. Further professional financial and technical support is also available through Locality for this purpose. A housing target needs to be agreed with the LPA as advised in the national guidance and more information on this is contained below. As a way forward we would advise that a comprehensive Housing Topic paper is produced that reviews all the factual evidence across the whole built environment and seek to draw out all the issues both positive and negative that have a bearing on the NPA.</p> <p><u>Housing Target</u></p> <p>42. Strategic policies in the Local Plan set out the overall housing target for the District and distribute growth across a hierarchy of settlements. Such requirements are based on the overall housing requirement/target of the Local Plan and are based on appropriate evidence and national policy and assist in the Council meeting its own identified housing needs at a strategic level across the District. Blakeney is identified as a service centre and as such is a settlement that provides for wider district needs as well as its own and this wider function should be explained in the plan along with how through the emerging neighbourhood planning additional sites can be identified to address any properly evidenced local need.</p>	<p>Comments noted, however, your classification of Blakeney as a “service centre” is incorrect.</p> <p>In the Core Strategy Blakeney is identified in Policy SS1 Spatial Strategy for North Norfolk as one of the six Coastal Service Villages. The policy states “Development in these Coastal Service Villages will support local coastal communities in the face of coastal erosion and flood risk. Land may be identified in or adjacent to these settlements to provide for new development or relocation from areas at risk.”</p> <p>Blakeney is identified in the emerging Local Plan in Policy SD 3: Settle Hierarchy and Policy HOU 1: Housing Targets for Market & Affordable Homes as one of five “Larger Growth Villages”.</p> <p>Growth Villages (large and small) are defined in the emerging Local Plan in paragraph 7.24 as...</p> <p>“The Growth Villages (large and small) have a number of services but the range is often limited and</p>

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		<p>43. In order to address affordable housing provision in line with the government expectations and the neighbourhood plan's ambition to ensure a more balanced housing market the Plan should include a <u>locally derived housing target informed by local evidence of need.</u></p>	<p>only Ludham, Mundesley, Briston and Blakeney include a Primary School, convenience shop(s), doctors' surgery, some public transport, some 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. Outside of these selected locations most settlements have very limited services and residents need to travel elsewhere to access schooling, shopping, employment and other facilities. Housing growth in such locations would be unsustainable as it would fail to meet the objectives outlined above. Nevertheless these communities have affordable housing needs and the Council believes these should be addressed locally provided such proposals are modest in size and do not result in harmful impacts."</p> <p>Despite looking we have not been able to find a definition of a "service centre" within the emerging Local Plan.</p> <p>Comment noted, however, this is not necessary, as per earlier responses, Blakeney Neighbourhood Plan does not seek to allocate additional housing.</p> <p>Comment noted, however, it is not the place of NNDC to say what the Blakeney Neighbourhood Plan should or should not include. The Blakeney Neighbourhood Plan and its policies have been developed through extensive community</p>

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		<p>The Plan should be seeking opportunities for positive growth through the identification of additional sites (to the emerging Local plan) and allocate additional housing sites.</p> <p>This could include the identification of sites, both market and/or exception housing to address any fully evidenced local needs over and above that required through the emerging Local Plan.</p> <p>44. As the Plan makes provision for housing and introduces housing policies, the NPPF now expects the Local planning Authority to set a housing requirement for designated neighbourhood plan areas. The housing requirement figure and its origin (specific to the neighbourhood plan) are expected to be set out in the neighbourhood plan as <u>a basis for their housing policies</u>. In order to meet need, neighbourhood plans are expected by the Government to plan to meet their housing</p>	<p>engagement to meet the agreed Objectives of the community and the Vision the community wish to see delivered. The Blakeney Neighbourhood Plan is framed in the positive, recognises that growth will come to Blakeney and seeks to ensure that growth helps to maintain a sustainable community while being mindful to the heritage and environment.</p> <p>Comments noted. The Blakeney Neighbourhood Plan does not seek to allocate additional housing. This comment is surprising and concerning as the Steering Group were under the impression that the emerging Local Plan was for the entire district of North Norfolk, including Blakeney. That being the case, and to avoid double counting, it should not be possible to identify “local needs over and above that required in the emerging Local Plan” as these should already be included.</p> <p>Comment noted. However, this is not necessary, as per earlier responses, Blakeney Neighbourhood Plan does not seek to allocate additional housing.</p>

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		<p>requirement and where possible exceed it through additional housing allocations including affordable housing.</p> <p>45. The plan would benefit from greater clarity on the housing target and along with greater clarity on the status of Core Strategy and emerging local plan allocations.</p> <p>The Plan gives the impression that it will influence the Core Strategy allocations, however these have already been fully built out. The emerging Local Plan allocations would remain a strategic allocation to address a wider need and it must be made clear in the contextual information that neighbourhood plan policies apply to the growth outside that identified as strategic growth i.e. only apply to growth brought forward through the neighbourhood plan. This is particularly relevant in relation to the proposed approach around principle residency, and the policies in the Build Environment section other issues around conformity.</p>	<p>Comment noted. The Blakeney Neighbourhood Plan goes to great extent (eight pages in section 5) to explain the planning context of the Development Plan, the Core Strategy and key Policy SS1 that identifies Blakeney's position as a Coastal Service Village and relating the Core Strategy Aims to how they apply to Blakeney. The Site Allocation for Blakeney BLA03 (now complete).</p> <p>The emerging Local Plan is discussed and NNDC's preferred site for allocation is identified along with nine other sites put forward by landowners.</p> <p>Comments noted, however, your interpretation of planning regulations is incorrect, and you are not the first (and probably not the last) Local Planning Authority) to get this wrong initially – this was explained in detail at the meeting on 25th March 2019 (see 21 above).</p> <p>Once the Blakeney Neighbourhood Plan is 'made' any planning application in its determination (outline, detailed, reserve matters [period to 'first permits being issues]) will take account of all policies in the Development Plan, which will include all the policies in the Blakeney Neighbourhood Plan.</p> <p>Comment noted. However, this is not necessary, as per earlier responses, Blakeney Neighbourhood Plan does not seek to allocate additional housing.</p>

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		<p>In order to do this, you need to set a housing target and bring forward appropriate growth.</p> <p><u>Setting a housing Target</u></p> <p>46. National guidance advises that any housing requirement set should be met and where possible exceeded. In order to do this the NPPF expects that an indicative housing target is provided to neighbourhood planning bodies by the Local Planning Authority.</p> <p>Such a target should be in addition to the strategic target set out in the Local Plan and based on evidence. This should be based on local characteristics, evidence and in agreement with the neighbourhood plan body. Any housing requirement is subject to the basic conditions tests and needs to be in general conformity with the Local Plan and will need to be tested at examination. <u>No such housing target has been requested, nor does the plan seek to positively provide for any additional growth in order to address its objectives. As such these areas are highlighted for concern and should be reviewed as a matter of urgency in conjunction with officers.</u></p>	<p>Comment noted. Not necessary, as per earlier responses, Blakeney Neighbourhood Plan does not seek to allocate additional housing.</p> <p>The housing target in the emerging Local Plan does raise concern as NNDC has decided to come away from the standard national methodology. If this approach by NNDC is not upheld at the emerging Local Plan's examination, it is likely to require significant reworking of the emerging Local Plan and further site allocations across the district.</p> <p>Comment noted. This is incorrect. As per response above (43) this would result in double counting.</p> <p>Comment noted. However, this is not necessary, as per earlier responses, Blakeney Neighbourhood Plan does not seek to allocate additional housing.</p>

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		<p>47. It is advised that agreement on an indicative housing target is sought from the LPA which can be used as a starting point for the housing policies. In setting any housing target consideration will be given to relevant policies in the existing and or emerging spatial strategy as set out in the Local Plan alongside the characteristics and factual evidence of the neighbourhood plan area. <u>In general, the Council are supportive of additional appropriate small scale growth in all parishes through neighbourhood planning where it is demonstrated there is a local need.</u></p> <p>Evidence Base</p> <p>48. Key to the development of a sound neighbourhood plan is the evidence base, which should be fully transparent, referenced and verifiable. Evidence, not opinion, should be used to inform and justify the development of any plans options and emerging proposed policies. Building a strong evidence base, to support and inform the production of a neighbourhood plan is vital to the immediate and longer term success of a neighbourhood plan.</p> <p>49. The National Planning Policy Framework states: <i>Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order.... A local</i></p>	<p>Comments noted. The Blakeney Neighbourhood Plan is supported by a strong evidence base – see the Blakeney Baseline Data document – with justification and explanation included within the text elements of the Blakeney Neighbourhood Plan itself.</p> <p>Comments noted, however unable to find this reference and words contained in the National Planning Policy Framework, please could you advise the paragraph number.</p> <p>It is disappointing that this has been raised again, as it was discussed at length in our meeting on 25th March and subsequent workshop on 5th July 2019 (see above response [21]), that the evidence base for the Blakeney Neighbourhood Plan is considerable and extensive with elements included within the Blakeney Neighbourhood Plan and more</p>

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		<p><i>planning authority should share relevant evidence, including that gathered to support its own plan-making, with a qualifying body.</i></p> <p>Paragraph: 040 Reference ID: 41-040-20160211 revision date 11.02.2016</p> <p><i>...Any neighbourhood plan policies on the size or type of housing required will need to be informed by the evidence prepared to support relevant strategic policies, supplemented where necessary by locally-produced information.</i></p> <p>Paragraph: 103 Reference ID: 41-103-20190509 Revision date 09.05.2019</p>	<p>detailed data and analysis presented in the Blakeney Baseline Data document. It was agreed in the meeting that there are large amounts of appropriate evidence although, at the time not positioned with the relevant policy. The Blakeney Neighbourhood Plan was restructured on the suggestion of NNDC to place evidence, justification and supporting text with the relevant policy in the Blakeney Neighbourhood Plan.</p> <p>The key word being emphasised “Proportionate”. NNDC Officers seem unable to differentiate between the requirements of neighbourhood planning and those which are far more stringent for the emerging Local Plan.</p> <p>Comment noted, thank you for highlighting the guidance.</p> <p>Comment noted, thank you for highlighting the guidance.</p> <p>However, as per earlier responses, Blakeney Neighbourhood Plan does not seek to allocate additional housing.</p>

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		<p><i>A neighbourhood plan can allocate additional sites to those in a local plan (or spatial development strategy) where this is supported by evidence to demonstrate need above that identified in the local plan or spatial development strategy</i></p> <p>Paragraph: 044 Reference ID: 41-044-20190509 Revision date 09.05.19</p> <p>50. Evidence is extremely important, it ensures that the choices made in your neighbourhood plan are backed up by facts and that the policies produced are robust and justified as required by national policy and guidance..</p> <p>51. The Blakeney Plan is almost entirely based around opinion. The opinion and views of the local community may demonstrate that the policies and approach in your plan have been informed by the consultation with the local community (and others with an interest in the area). However, it needs to be understood that opinion itself does not provide the justification for policies choices.</p> <p>52. These community views or aspirations should have been built upon by examining and analysing evidence. There is no substitute for research and fact finding which demonstrates that the choices made in the Plan are backed up and substantiated by up to date and robust background facts and evidence. If there is not the evidence to support the</p>	<p>Comment noted, thank you for highlighting the guidance.</p> <p>The Blakeney Neighbourhood Plan is supported by a strong evidence base – see the Blakeney Baseline Data document – with justification and explanation included within the text elements of the Blakeney Neighbourhood Plan itself.</p> <p>Comments noted. This is incorrect. The Blakeney Neighbourhood Plan has been shaped by opinion in the usual iterative way that neighbourhood planning process demands, the policies have been developed using the views expressed by the local community but also informed and justified by the extensive evidence base provided in the Blakeney Baseline Data document.</p> <p>Comments noted. This is exactly the process that has seen the development of the policies in the Blakeney Neighbourhood Plan.</p>

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		<p>community raised view or concern, then the Plan should be honest and explain the evidential context and not have a policy for the sake of it.</p> <p>Evidence needs to be locally derived, and it is wrong to seek to justify policies after an approach has already been predetermined.</p> <p>53. When using factual data, care must be taken in undertaking and presenting an objective analysis. Any review should not seek to skew data towards your preferred outcome but present a full and transparent picture from which to draw conclusions from.</p> <p>At present there is some concern that data used especially in the Build Environment section is incorrectly analysed and as such presents a misleading and leading picture to readers.</p> <p>E.g. Comparisons with Norfolk as a whole rather than the District Figures a whole different conclusion would be drawn. As such an incorrect picture is used to justify policies which will not stand up to scrutiny, will misinform the reader and has the potential to be undermined. Further detail on this is provided in the relevant sections below.</p> <p>54. A significant concern is the predominance of large sections of text and policy wording that has been copied from other made</p>	<p>Comment noted. It is disappointing that NNDC choose to use comments that are incorrect. No explanation or detail is given by NNDC to this sweeping statement.</p> <p>Comment noted. It is disappointing that NNDC choose to 'make up' comments that are incorrect.</p> <p>Comment noted. Hopefully NNDC explain their concern in more detail later in their comments to enable a response and, if necessary, corrective action taken.</p> <p>Comment noted. The comparison with Norfolk is valid and the data presented is correct. Hopefully NNDC identify in more detail later in their comments exactly where this is to enable a response and, if necessary, corrective action taken.</p> <p>Comment noted. With over 800 made Neighbourhood Plans it is now usual for Steering Groups to look at these Neighbourhood Plans for guidance on what will successfully pass examination – rather than 'reinventing the wheel' – and then use local evidence and justification.</p>

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		<p>neighbourhood plans. In particular, significant elements of the first five policies and supporting text seem to be directly lifted from two specific neighbourhood plans – St. Ives and North Northumberland Coast. There has been no review or presentation of the supporting evidence that accompanied those plans and on review is specific to their local circumstances. There has not been any meaningful analysis to provide justification for the same approach in Blakeney. This approach is not condoned and has the potential to undermine the long term application of the Plan and opens the risk of challenge.</p> <p>55. A failure to base policy on robust evidence runs a considerable risk that it will not accord with the basic conditions and may be ineffective as the Council will not be able to rely on it in the longer term as a consideration in the determination of planning proposals. This affects the life and usefulness of a neighbourhood plan.</p> <p>This is particularly relevant in relation to the proposed approach around principle residency, where very little justification or evidence has been put forward to support the approach.</p> <p>In order to bring forward such an approach a far more detailed and quantifiable evidence base needs to be developed on the basis of demonstrating the wider impacts of</p>	<p>It would seem NNDC are now agreeing that Policies 1 to 5 in the Blakeney Neighbourhood Plan are valid and appropriate policies – based on the inclusion of similar policies in the St. Ives and North Northumberland Coast Neighbourhood Plans – provided that the local evidence can justify them. Which the supporting strong evidence base in the Blakeney Baseline Data document and the justification and explanation included within the text elements of the Blakeney Neighbourhood Plan itself does.</p> <p>Comments noted. The Blakeney Neighbourhood Plan meets the basic conditions – as robustly demonstrated in the Basic Conditions Report submitted as one of the supporting documents).</p> <p>Comment noted. The Blakeney Neighbourhood Plan has two pages of explanation, justification and evidence relating to second home ownership, while the Blakeney Baseline Data document has one page of evidence.</p> <p>NNDC should be reminded that the evidence in the Blakeney Neighbourhood Plan needs to be “proportionate”.</p> <p>Comments noted, although Blakeney is a ‘village’ not a “Town”. Looks like this comment has been copied maybe from a different response NNDC has given to another Neighbourhood Plan.</p>

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		<p>unrestrained growth on the whole sustainability of the town and neighbourhood plan area, rather than the populist view cited that the number of second homes is hampering affordable house occupation by those with a local connection. Any claims of unsustainable impacts need to be substantiated by factual data and analysis of both positive and negative effects that second homes are believed to bring in order to establish the wider impacts on the sustainability of Blakeney.</p> <p>56. A detailed guide on how to establish and justify such a policy approach is contained in the NNDC neighbourhood plan guide to housing. The guide explains the evidence approach required and the detailed considerations that need to be presented in order to support and justify policy development. The guide uses the St. Ives approach as a case review and identifies basic evidence considerations such as:</p> <ul style="list-style-type: none"> ○ the position the settlement holds in the settlement hierarchy ○ viability impacts and consideration on the rate of deliver ○ existing age cohort of the parish ○ proportion of second homes (noting the difference between second homes and holiday homes) as well as the occupancy rates and the use as holiday lets and therefore their contribution to the local tourism economy 	<p>NNDC should be aware that this is not a “populist view”, instead it is a very divisive issue within the local community which is made up of a large number of second homeowners.</p> <p>Comments noted and thank you for highlighting this resource which has already been used in the development of the Blakeney Neighbourhood Plan.</p>

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		<ul style="list-style-type: none"> ○ trend based analysis ○ occupation rates ○ level of services ○ the consideration of alternatives that may more closely relate to the plans aims. <p>57. Any approach needs to be supported by a detailed analysis around the three strands of sustainability and include both positive and negative impact analysis specific to Blakeney followed by a balanced assessment of the potential options. It is simply not enough just to copy a policy from another plan.</p> <p>58. In developing policy approaches unintended effects should be considered. e.g. new housing that is subject to principle residency does not have the price controls that affordable housing does, or any local connection requirement so any property that has this condition will not contribute to the prime aim of the parish council and community of providing affordable housing. Also such an approach can have negative effects on land and house values which can impact the viability of delivery.</p> <p>59. A failure to ensure this advice is followed will leave the Parish Council vulnerable to challenge, especially when the issue of the lack of housing growth being promoted, and the lack of a housing target are taken into consideration. In short any policy approach seeking a principle residence restriction will</p>	<p>Comments noted, however Policy 1 of the Blakeney Neighbourhood Plan is specific to Blakeney and supported by the evidence and justification.</p> <p>Comments noted.</p> <p>Comments noted. However, with 30 new homes due to be built to 2036 – less than two years – the lack of housing growth is not a significant issue.</p>

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		<p>need evidence that they (second homes) are the cause of problems and the restriction, if applied would be an effective measure without potential adverse unintended consequences</p> <p>60. Evidence from St Ives is that this is now starting to impact on housing delivery in a negative way and that those wishing to purchase second homes are still doing so, but from the existing stock. A recent publication from the London School of Economics (as reported in The Telegraph) concluded that there has been a 7% rise in house prices in the existing stock and as such the policy has failed to address affordability or allow greater access to the market of local people. These factors and the effectiveness of any approach needs to be considered and documented as explained further is the detailed response to Policy 2 and is particularly relevant as the neighbourhood plan as drafted has the effect of constraining the supply of housing further.</p>	<p>Comments noted. Second homeownership is a difficult issue and the article in the Telegraph recognises this but, sadly, also sensationalises it. It is not balanced in its reporting and does not answer a number of key questions, such as:-</p> <ul style="list-style-type: none"> • How many local residents have benefited? • Are existing residents now able to buy new properties? • Are more homes occupied for more of the time? <p>This can NOT be classed as evidence – a newspaper report – as the actual report strangely includes nothing specifically relating to St Ives. In fact, his recent research on second home ownership was undertaken in Switzerland. The report provides no actual statistics of price changes in St Ives.</p> <p>An analysis has been carried out of comparisons to compare this assertion of what happened in St Ives with other similar coastal areas. Source: https://cornwalldevelopersparadise.wordpress.com/2019/11/22/the-case-of-the-research-study-that-wasnt-st-ives-second-home-ban/</p> <p>It states if the experience in St Ives is different, then this may well indicate an effect of the second home ban.</p>

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			<p>If we compare the past four years of price changes, from 2015 to 2019, at the Middle Super Output Area level, prices of new houses at St Ives have indeed fallen, and by 14%, close to the figure cited in the press.</p> <p>However, the numbers of new houses sold were extremely low, just a handful a year, which makes any price change index volatile.</p> <p>In addition, other places in Cornwall saw even greater falls in this same period:-</p> <ul style="list-style-type: none"> • St Austell prices of new housing fell by 43%. • Wadebridge new house prices were down by 38%. • Lanreath and Duloe the fall was 18%. • St Minver and St Kew it was 17%. <p>In none of these places was there a ban on new build second homes in this period.</p> <p>Meanwhile, prices of existing stock did indeed rise in St Ives, by 28% over this same period. But they also rose and at a very similar rate, in other coastal areas of Cornwall: -</p> <ul style="list-style-type: none"> • West Penwith the rise was 30% • Roseland 27% increase • Wadebridge up by 28% • In parts of Falmouth increased by 29% • Padstow and St Merryn a rise of 35%. <p>In none of these areas was there a ban on new build second homes in this period.</p>

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			<p>There is no evidence at all that the ban on second homes is the cause of the price rise in the existing housing at St Ives. Other areas with similar second home demand have experienced very similar price changes since 2015.</p> <p>The actual causes of this look likely to lie in more general factors, not the specific St Ives ban. The headline in the <i>Telegraph</i>, that the ban 'led to [the] rise in house prices' is false, misleading and unsupported by the data.</p> <p style="text-align: right;">Posted on November 24, 2019</p> <p>It should be noted further comments are available in the press, such as from Andrew Mitchell, Cornwall councillor for St Ives West and Cornwall Council cabinet portfolio holder for homes. He is reported to have said the issue of high housing prices had been going on for 30 years and insisted he had not encountered anyone in the town complaining of being priced out as a result of the ban.</p> <p>He said: "I think it is too early to tell and we need three, four or even five more years before we can say whether the ban has made things worse."</p> <p>"I don't think we have had enough large-scale developments in the towns for anyone to point the finger at the second homes ban as a good or bad thing."</p> <p>Comments noted and thank you for highlighting this resource which has already been used in the development of the Blakeney Neighbourhood Plan.</p>

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		<p>61. For detailed guidance on evidence and how to identify, use and sources of evidence please refer to the NNDC guidance document published on the Council's web site.</p> <p><u>Evidence example: green infrastructure and open space</u></p> <p>62. The Plan contains numerous poorly constructed sections but can be demonstrated through the open space section of the plan where there is a missed opportunity to set out a local green infrastructure strategy that will deliver the connections and improvements outlined as aspirations of the local community.</p> <p>63. Policy 13 adds no local distinction to existing policies. What the policy should be doing is designating appropriate sites for the Core Strategy policy to apply. In doing so any sites that meet the review criteria should also be mapped. Many of the spaces listed already benefit from an environmental/open space protection through various designations and Core Strategy / emerging Local Plan policies, where existing policies cover both designated and undesignated open spaces. As such the proposed policy does not bring any further protections to these sites and the policy along with the duplications / repetition of sites should be removed from the neighbourhood.</p>	<p>Comments noted. However, just because (in NNDC's view) an opportunity has been missed does not mean the section is "poorly" constructed. The "aspirations of the community" that could not be converted into policy (due to lack of evidence, justification or delivery method) have been captured and recorded as in Section 7: Community Projects and Actions of the Blakeney Neighbourhood Plan.</p> <p>Comments noted. Policy 13 of the Blakeney Neighbourhood Plan identifies known and additional open spaces that the community of Blakeney has noted as being important and should, as far as possible, be retained.</p> <p>A map detailing each of the open spaces will be added.</p> <p>Comments noted. Each of the Open Spaces has been assessed against the criteria listed in the Blakeney Neighbourhood Plan – Historic Importance,</p>

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		<p>64. There should be a thorough audit of existing policies and designations and Core strategy policy to inform future iterations of this Plan and include its findings as contextual information in the document to inform parishioners, the inspector and any determining officer at time of application.</p> <p>65. In order for existing Core Strategy policies to apply to any identified open space sites (and to address the communities' wishes around the importance for these areas for recreational, amenity and visual impact) there should be a robust assessment. The assessment must conclude on the suitability (or not) for designation together with an explanation of the methodology used. This detail should be contained in a background topic paper</p> <p>66. In the current Core Strategy protection is given to 'Open Land Areas' and 'Education and Recreation Areas' which are formally designated on the Proposal Map via adopted policy CT1 of the Core Strategy 2008. The parish council will be aware that as part of the preparation of a new Local Plan for the District the district council reviewed its evidence and policy approach in relation to designations and the provision of new, and protection of existing, green spaces of various types following feedback from the PC. The full assessment has been published and is available on the Council's web site and</p>	<p>Amenity Value and Strategic Importance - as detailed in paragraphs 6.253, 6.254 and 6.255. The outcome of the assessment is recorded in Table 2.</p> <p>Comments noted. Please see above response (64) for methodology used.</p> <p>Comments noted.</p>

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		<p>should be used in any review. In addition the council has published all the existing planning constraint layers including those with open space environment designation on its interactive constraint layer which the group can easily access https://maps.north-norfolk.gov.uk/wmlpublic/Map.aspx?MapName=FindIT</p> <p>67. Neighbourhood plans can bring forward protection for open space through the assessment of additional sites subject to an open and transparent review as outlined in the NPPF. Sites that meet the qualifying criteria for Local Green Space designation and or more general open land area should clearly be identified. LGS sites are given specific policy protection in the NPPF. Further information and the full assessment framework is provided for both in the published NNDC guidance on local Green space and in the Amenity Green Space review both available on the Council's web site.</p> <p>68. As a minimum the chapter should reference the sites with existing designations, a separate evidence paper should be prepared setting out how additional potential sites were identified and what value they bring i.e. through a review of existing all open space in the village, and then assessed according to the methodology set out in the NPPF (and detailed in the NNDC guidance). The council's published material includes an</p>	<p>Comments noted. Please refer to the Ambition statement at paragraph 6.240 as the Blakeney Neighbourhood Plan does not seek designation as Local Green Space as some of these areas do not meet the National Planning Policy Framework, paragraphs 99 – 100, criteria. As not all are 'green' and there is uncertainty of being capable of enduring beyond the end of the plan period.</p> <p>Comments noted. However, not necessary for a separate paper. Details of the sites coming forward through the consultation events is recorded in the Consultation Statement. The assessment criteria used is listed in the Blakeney Neighbourhood Plan – Historic Importance, Amenity Value and Strategic Importance - as detailed in paragraphs 6.253, 6.254 and 6.255. The outcome of the assessment is recorded in Table 2.</p>

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		<p>assessment pro-forma which can be used for such purposes.</p> <p>69. It should be noted that the NPPF specifically steers communities away from designation of large tracts of land and those that have been put forward for potential development. If such an approach was taken it would be contrary to the NPPF and as such runs the considerable risk of deletion. For a full list of potential housing sites, the published Housing and Economic Housing Land Availability Assessment, HELAA should be used as a source of evidence.</p> <p>70. For any sites that are subsequently identified as warranting special protection the location and extent should be identified and mapped in the neighbourhood plan and clearly referenced in a policy</p> <p>71. As an alternative to the approach currently detailed the steering group have the opportunity to address the wider community aspirations around open space and connectivity through the production of a locally distinctive GI strategy and link its delivery to growth.</p> <p>72. NPPF states: "To assist in planning positively for green infrastructure local planning authorities may wish to prepare an authority-wide green infrastructure framework or strategy. This should be evidence-based by, for example, including an assessment of current green</p>	<p>Comments noted. Paragraph 100(c) of the National Planning Policy Framework. The Blakeney Neighbourhood Plan does not seek designation as Local Green Space.</p> <p>Comment noted. NNDC is currently kindly producing a map of these Open Spaces for inclusion.</p> <p>Comments noted. With a low level of growth being proposed through the emerging Local Plan it would be inappropriate to impose requirements that are disproportionate to the scale of development.</p> <p>Comment noted. Does the inclusion of this comment mean that NNDC are undertaking a district-wide infrastructure framework over and above the assessment work linked to the emerging Local Plan?</p>

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		<p>infrastructure provision that identifies gaps in the network and the components and opportunities for improvement. The assessment can inform the role of green infrastructure in local and neighbourhood plans, infrastructure delivery plans and Community Infrastructure Levy (CIL) schedules."</p> <p>"Local Plans should identify the strategic location of existing and proposed green infrastructure networks. Where appropriate, supplementary planning documents can set out how the planning, design and management components of the green infrastructure strategy for the area will be delivered."</p> <p>73. As such a local assessment of GI gaps and a strategy that address how to add local value could be included in the final plan rather than slightly meaningless section that repeats existing policy.</p> <p>Evidence conclusion</p> <p>74. If the Plan does not have the evidence to support a particular policy approach, then you should consider removing the policy otherwise you run the risk of the independent examiner recommending the policy is deleted or modified in line with any evidence provided at examination by third parties and or from national policy.</p>	<p>Is NNDC now seeking to align with other Norfolk District Councils and reconsidering the introduction of Community Infrastructure Levy (CIL)?</p> <p>Comments noted and we look forward to seeing this with the next version of the emerging Local Plan.</p> <p>Comments noted. However, what NNDC is suggesting is not realistic for the proposed level of development in Blakeney.</p> <p>Comments noted. All policies within the Blakeney Neighbourhood Plan are supported by the appropriated and proportionate level of evidence, as agreed in the meeting of the 25th March and workshop held on 5th July 2019. The Blakeney Neighbourhood Plan has been restructured to facilitate evidence and justification being located close to each policy. The Blakeney Baseline Date document contains more evidence and analysis.</p> <p>Comment noted. The approach taken in the Blakeney Neighbourhood Plan of policy</p>

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		<p>Secondly, if a policy approach remains unjustified it runs the risk of not being enforceable in the longer term.</p> <p>75. If you remove a policy because of a lack of evidence you may wish to explain to the local community in the draft plan or consultation statement, why a particular issue they raised during consultation is not being addressed in the neighbourhood plan. If in any review, there is an evidence gap you may need to commission further evidence. The policy team can advise on the best ways to go about this.</p> <p>76. As a way forward the steering group should review available quantitative evidence and where necessary seek to establish other locally derived evidence to inform potential options. These options should be reviewed in line with the evidence to inform the best policy outcome. Jumping to a policy position without first considering the evidence should be avoided at all cost</p> <p>77. Further information is available in the NNDC guide on evidence for neighbourhood planning and in relation to housing policies, e.g. setting the housing target, and how to approach establishing a suitable evidence base for second homes can be found in the neighbourhood planning housing guide.</p>	<p>development and implementation is supported by guidance provided by Locality. Many similar policies are included in made Neighbourhood Plans.</p> <p>Comment noted. Should this happen, this will be addressed in the Consultation Statement document.</p> <p>Comment noted. This approach has already been undertaken by the Steering Group in developing the each of the policies in the Blakeney Neighbourhood Plan and will continue to be the approach as policies are finalised.</p> <p>Comment noted and thank you for the reminder.</p> <p>Comment noted, thank you for highlighting the guidance.</p>

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	Policy 10	<p>80. Not only do a significant number of the policies duplicate the existing and emerging policy base they also duplicate and conflict with each other. The plan would benefit from a full review of policies against those identified as strategic policies in the Core Strategy and also emerging Local plan. Where there is conflict policies should be removed or amended to remove the conflict. Clarity needs to be sought and further topic based discussions with officers as previously suggested are encouraged to establish a fuller understanding.</p> <p>81. An example of this is the Policy 10 Drainage and Flooding where it repeats the approaches already detailed in National Policy, Core Strategy and emerging local plan. The policy is an unnecessary duplication and the policy actually seeks more onerous requirements than National Policy in the case of SFRA but no evidence is put forward to justify this approach. The policy does not seek to address any local specific flooding issue which is not already captured through existing policy and as such is unnecessary and should be deleted.</p>	<p>Comments noted. This is an incorrect statement. The Basic Condition Report demonstrates specifically how and where the policies in the Blakeney Neighbourhood Plan support and complement those in the Core Strategy. The Blakeney Neighbourhood Plan has policies that will be successful at a neighbourhood level.</p> <p>Comments noted. Policy 10 of the Blakeney Neighbourhood Plan is a good example of a policy that operates at a neighbourhood level. The Local Lead Flood Authority (LLFA) have assisted in its drafting for neighbourhood planning and support its inclusion, please see response no.25.</p> <p>It is noted and welcomed that many, but not all, of the elements of Policy 10 have been replicated and included in the draft Policy SD 10 of the emerging Local Plan.</p> <p>The Environment Agency have also given their support and have gone on to comment "are glad to see that Policy 10 on drainage and flood risk requires that all proposals for new development within the Blakeney Neighbourhood Plan's area should be accompanied by a Flood Risk Assessment (FRA). Please see response no.23.</p>

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	Policy 13	<p>82. Another example is the promotion of the former school playing field on Langham Road as a 'protected' open space in Table 2. It is understood that the Parish Council is also supportive of an affordable housing scheme on this site and has had discussions with Blakeney Housing Trust and Broadland Housing Association. The neighbourhood plan therefore offers an opportunity not to reinforce the current open land area designation but to remove it and promote the site for Housing. Planning decisions are made in accordance with the Plan and the site is already designated as 'Open Land'.</p> <p>83. Ambiguity, repetition and conflict in and between neighbourhood plan policies should be removed. It should be noted amending a Draft Plan is not the role of the Inspector who is more likely to remove policies than seek to resolve a plans short comings.</p> <p>Significant conformity issues are highlighted in this overview and also detailed in section 2. Policy writing: Clarity and Effectiveness</p>	<p>Therefore, Policy 10 of the Blakeney Neighbourhood Plan will remain.</p> <p>Comments noted. If this proposal does come forward once the Blakeney Neighbourhood Plan is 'made' then the proposals will need to satisfy the requirements of Policy 13.</p> <p>This is an example of where the Blakeney Neighbourhood Plan has development a policy based on evidence and justification. This seems contra to the iterative approach to neighbourhood planning and contra to NNDC;s earlier incorrect comment, see (52) above, "..... and it is wrong to seek to justify policies after an approach has already been predetermined." It now seems NNDC are seeking the Blakeney Neighbourhood Plan to do what NNDC said previously in their comments was "wrong".</p> <p>Comment noted. The Steering Group will ensure there is no ambiguity, repetition or conflict in and between neighbourhood plan policies.</p> <p>Comment noted. To quote Tony Burton in his Locality policy writing guide "There are few absolutes and planning professionals and even Examiners have been known to have differing views." As previously stated above and discussed in the meeting with NNDC on 25th March 2019 there are NO conformity issues.</p>

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		<p>84. As set out in the NPPF plans should be aspirational but realistic. This means that plans need to balance evidence of need, and evidence of viability and deliverability. The expectation of government is that neighbourhood plans are positively prepared - i.e. not restrictive or protectionist. Collectively there is concern that the policies when taken as a whole are restrictive and could stagnate development. As such the plan itself despite words to the contrary in the document is considered not to be positively prepared.</p> <p>85. National planning guidance states that</p> <p><i>'A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications.'</i></p> <p>86. Many policies in the plan would benefit from amended wording to ensure clarity for application and implementation purposes. Duplication and conflict within policies also causes concern and Officers have suggested policy deletions where it considers the policy repeats other parts of the statutory development plan or the intended outcome of the policy cannot be achieved through the planning system.</p> <p>87. In some policies there is also the need to clarify in the supporting text where it is expected where and how a policy will apply -</p>	<p>Comments noted. The Blakeney Neighbourhood Plan is positively prepared. Hopefully these concerns are detailed later in your comments to enable a response and, if necessary, corrective action to be taken.</p> <p>Comment noted.</p> <p>Comments noted. Hopefully the suggested amended wording has been detailed later in your comments to enable consideration and, if necessary, rewording of the policy.</p> <p>Comments noted. Hopefully the clarity required has been suggested later in your comments to enable</p>

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		<p>there is a need to provide clarity of whether the policy should apply to the neighbourhood planning area as a whole or only in certain parts.</p> <p>88. Policies such as Policy 3 (Change of use from Residential to Holiday Accommodation) includes misleading and inaccurate interpretation of planning law and should be removed. Detail of these are included in the individual policy section that follows these comments. A failure to address these will result in running increased risks at examination of policy deletion. In order to rectify this a review of the effects of the Plan should take place and each individual policy checked so that they are each positively worded, and collectively do not conflict or overlap with each other or seek to repeat approaches already in the plan and wider development plan.</p> <p>89. With regard to Policy 8, it is not clear on what basis are you seeking to remove permitted development rights. In applying the policy an officer requires a justifiable reason to apply the policy and a blanket ban would not be enforceable. What evidence exists that PD rights have caused unacceptable impacts?</p> <p>90. We want to work with the Plan Steering Group in order to come up with an agreed approach to bringing the Plan to formal submission stage. Our suggested next stages can be considered in 2 parts: 1. The work that</p>	<p>consideration and, if deemed necessary, included in the supporting text.</p> <p>All policies in the Blakeney Neighbourhood Plan apply to the entire Blakeney Neighbourhood Area.</p> <p>Comment noted. This will be responded to in the later sections of your comments.</p> <p>Comment noted. The removal of permitted development rights of 'infill' development does not prevent further development. It does ensure good design (a principle of the National Planning Policy Framework) ensues and permitted development rights are not used to undermine Policy 8 of the Blakeney Neighbourhood Plan.</p> <p>Comments noted and having already had a workshop with District Officers the Steering Group are aware of the value of working together and are keen to work through the evidence and justification again</p>

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		<p>can be done on reviewing all of the comments and then making the appropriate revisions, and; 2. The information and documentation that is required from the Parish Council as Submitting Body at submission stage.</p> <p>91. As previously stated we would like to discuss the response in detail with the Steering Group and also reiterate our willingness to provide ongoing professional support.</p> <p><u>Blakeney Plan consultation response review</u></p> <p>92. The Steering Group should review comments and should be recorded on a schedule of representations outlining the representations to each areas, from whom and how it has been taken into consideration in finalising the Plan. There may be a temptation for the Steering Group to continue with the approach as outlined in the Plan and not fully address the comments which are considered, by NNDC, to be fundamental. It is the Parish Council's prerogative to do so - as you may feel that your approach is robust and correct. However, we would recommend, and support, a comprehensive review of the evidence base and the policies.</p> <p>93. We would therefore ask that a step back is taken at this stage and you take us up on our genuine offer of support and assistance. As previously suggested, we can undertake a number of informal workshops or meetings</p>	<p>to help NNDC to understand it is appropriate and proportional.</p> <p>Comment noted and the Steering Group, once it has completed its review of all the comments, is keen to discuss the comments made by NNDC.</p> <p>Comments noted.</p> <p>Comment noted.</p>

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		<p>with the steering group based around topic areas.</p> <p><u>Submission requirements</u></p> <p>94. It would be helpful if we were given plenty of notice that the Plan is likely to be submitted. This allows for time to be programmed into our work schedule – so that we can give the planning for the examination of the Plan the appropriate level of attention.</p> <p>95. In the first instance, can we direct you to the guidance that NNDC have produced which includes a 'Submission Check Sheet'. That guidance will not be repeated in detail, but essentially requires the following:</p> <ul style="list-style-type: none"> ○ Sign off for submission by the Parish Council provided to Local Planning Authority. ○ A map of the designated Neighbourhood Plan Area. ○ The proposed Neighbourhood Plan - hard copy and in Microsoft WORD format. ○ A Consultation Statement. ○ A Basic Conditions and other legal requirements statement. ○ Any relevant supporting information – i.e. the evidence base. <p>96. We do not believe that NNDC were asked by the Steering Group on who to consult at this Reg. 14 stage. Therefore, we will require the</p>	<p>Comments noted.</p> <p>Comment noted, thank you for highlighting NNDC's guidance. For the avoidance of doubt this is guidance and the Blakeney Neighbourhood Plan will follow the requirements of the Neighbourhood Planning Regulations.</p> <p>Comments noted. Details will be provided at the appropriate stage, subject to GDPR requirement.</p>

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		<p>details of who was consulted and all those who responded as well as contact details at submission. However, the Parish Council must be aware of their GDPR responsibilities in relation to personal data.</p> <p>97. We will need to be satisfied that the Reg. 14 consultation has been brought to the attention of all those who have an interest in the parish and not just those who live there. For example, has there been an attempt to contact the second home owners or engagement with the property industry (those involved in land and house sales) and have all the landowners who are subject to any designations (i.e. open space) been contacted and given the opportunity to give their views? We would be happy to provide best practice copies of other consultation statements.</p> <p>98. Consideration should be given to Planning Policy Guidance on "Consulting on, and publicising, a neighbourhood plan". <i>A qualifying body must consult any of the consultation bodies whose interest it considers may be affected by the draft neighbourhood plan or Order proposal. The consultation bodies are set out in Schedule 1 to the Neighbourhood Planning (General) Regulations 2012 (as amended). Other public bodies, landowners and the development industry should, as necessary and appropriate be involved in preparing a draft neighbourhood plan or Order.</i></p>	<p>Comment noted, see above response.</p> <p>Comments noted. Comment noted, thank you for highlighting this guidance.</p>

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		<p>Paragraph: 048 Reference ID: 41-048-20140306.</p> <p>99. It is important that we have an editable version of the Plan in order to allow the post examination process to be effective and efficient. The Steering Group may have concerns regarding version control of the document, however, it must be noted that it is the responsibility of NNDC to accept or decline the modifications suggested by the examiner. NNDC have the following responsibilities following receipt of the examiner's report:</p> <ul style="list-style-type: none"> ○ NNDC is responsible for arranging the publication of the report as set out in the regulations. ○ We must consider each of the examiner's recommendations, the reasons for them and decide what action to take in response to each (e.g. what modifications to make, whether to extend a referendum area). ○ NNDC can make modifications to ensure the basic conditions are met and may decide to extend the area for referendum beyond the designated neighbourhood area (the default being the neighbourhood area matches the referendum area). ○ NNDC must publish a map of any extended areas (if appropriate). 	<p>Comment noted, however, not a requirement of the neighbourhood planning process or Regulations.</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
		<p><u>Strategic Environmental Assessment, SEA, & Habitat Regulations Assessment, HRA</u></p> <p>100. No SEA or HRA screening report accompanies the consultation document and these legal assessments will need to be carried out to inform the final production of the neighbourhood plan.</p> <p>101. Where a neighbourhood plan is likely to have a significant environmental effects, it may require a strategic environmental assessment, SEA. There is a requirement for draft neighbourhood plans to be assessed to determine whether the Plan is likely to have such effects. This process is referred to as screening. If an assessment finds that significant environmental effects are likely then a full SEA will need to be undertaken. Similarly, a screening exercise is required with regard habitat regulations assessment, HRA to</p>	<p>Comment noted. It had previously been agreed that NNDC would undertake the production of the Strategic Environmental Assessment (SEA) and Habitat Regulation Assessment (HRA) to support the Blakeney Neighbourhood Plan. Unfortunately, NNDC did not receive the request for these to be completed to support the Regulation 14 consultation.</p> <p>The Statutory Bodies have not raised this as an issue.</p> <p>It has been subsequently agreed with NNDC, since the Pre-Submission consultation has finished, that the SEA and HRA will be undertaken on the Examination version of the Blakeney Neighbourhood Plan, as this will include any modifications and changes.</p> <p>Comments noted. Thank you for outlining the process.</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
		<p>neighbourhood plan needs to be better explained – so that the reader is aware of how the suite of Plans are used in the determination of planning applications.</p> <p>103. Neighbourhood plans should provide a clear local distinction to the wider strategic content of the Local Plan in order to ensure planning proposals reflect local land use issues. The limitations of neighbourhood planning should be better and clearly explained in the executive summary.</p> <p>104. The reference to coastal erosion in the opening paragraph is particularly puzzling. No coastal erosion issues are identified in the existing coastal erosion risk mapping for Blakeney. There is no policy on coastal erosion (as is the right approach) in the Plan, nor is there a community project or action identified at Section 7.</p> <p>105. The Blakeney Plan will not ‘become part of the Local Plan’. It will sit alongside the Local Plan and form part of the ‘Development Plan’ for Blakeney.</p> <p>106. Reference to decisions being taken on “...traffic, pavements, cycle routes and such things that affect our daily lives” is also misleading in that the majority of ‘decisions’ on such matters will be the remit of the Highway Authority and do not require planning permission. In respect of where planning permission may be required, the</p>	<p>Comments noted. The Blakeney Neighbourhood Plan sets out the strategic context in Section 5: Sustainable Growth and Spatial Context, including the emerging Local Plan. Section 1: Introduction and Background positions the Neighbourhood Plan. These do not need to be in the Executive Summary.</p> <p>Comment noted. Included as an example of decisions beyond the scope of the Blakeney Neighbourhood Plan.</p> <p>Comment noted. Local Plan will be changed to Development Plan.</p> <p>Comments noted. The paragraph will be reworded to ensure it is not misleading.</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
	Section 2	<p>policies in this Plan appear to have limited impact on <i>such things</i>.</p> <p>107. The tone of the Executive Summary suffers the same failings as a number of the policies: it suggests, and promises, a level of influence on planning (and non-planning) matters that simply cannot be delivered.</p> <p>'About Blakeney'</p> <p>108. There is no census or demographic data presented in this section which would provide the demographic context for Blakeney. Although, some of this data is presented in the 'Built Environment' section, this section should really provide a clear picture, not just about the physical and historical fabric of Blakeney - but should also give the reader an understanding of the people who live there.</p> <p>109. It is important to highlight early on in the document that Blakeney lies within the Norfolk Coast AONB, a nationally designated landscape renowned for its scenic beauty and mosaic of coastal landscape.</p> <p>110. The saltmarsh habitat immediately north of the settlement is an internationally rare landscape protected through its designation as part of the North Norfolk Coast Special Area of Conservation (SAC), Special Protection Area (SPA), SSSI and Ramsar.</p>	<p>Comment noted. With the amendment above, on the only specific raised, the Executive Summary no longer does this.</p> <p>Comments noted. This section is to give the reader a feel for the history of Blakeney. The demographic data along with a vast amount of Census data is presented in a separate document – the Blakeney Baseline Data Report – that was issued to support the draft Blakeney Neighbourhood Plan.</p> <p>Comment noted. Paragraph 2.15 states that Blakeney is in the designated Area of Outstanding Natural Beauty.</p> <p>Comment noted. Theme 3: Natural Environment does not specifically mention the saltmarsh habitat, this will be added. Referenced is made in the Landscape section (from paragraph 6.176) of the important and protected sites and Map 7 specifically identifies the North Norfolk Coast Special Area of Conservation (SAC).</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
	Section 4	<p>111. The historic core of the village has been designated as a Conservation Area since 1974 and contains 102 listed buildings. A recent Conservation Area Appraisal has been undertaken and adopted and this should be used to inform the Neighbourhood Plan. e.g. Section 2 of the Appraisal: Summary of Special Interest could be used to set the scene in this Section 2: About Blakeney.</p> <p><u>'Vision and Aims for Blakeney'</u></p> <p>112. The Objectives may need revising once the detailed comments (in relation to the policies) are taken into account.</p> <p>113. Objective 1. To preserve the look and feel of the village. The use of the word 'preserve' implies that change would be detrimental to the look and feel of the village which may not be the intention. Suggest the wording could be amended to read as follows:</p> <p><i>To accommodate appropriate change and development so that the intrinsic character and appearance of the village is retained and enhanced.</i></p> <p>114. Objective 7. To maintain a navigable port in Blakeney for leisure and commercial craft. This is picked up as a 'community project and action' – but is not reflected in the main Plan or in a specific policy. Suggest it</p>	<p>Comment noted. The Blakeney Conservation Area Appraisal and Management Plan is covered in detail in the Heritage section (from paragraph 6.197). Additional words will be added to section 2 to introduce the heritage of Blakeney.</p> <p>Comment noted. The Objectives have been agreed with the local community.</p> <p>Comments noted. This assumption is not true. The Objective is linked to the Vision and seeks to preserve Blakeney's "...unique character..."</p> <p>Comment noted. The suggested wording will be used to update Objective 1.</p> <p>Comment noted. Despite not being able to deliver a policy with the Blakeney Neighbourhood Plan to facilitate Objective 7 the navigable port is seen by the community as being very important. It will remain</p>

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	Section 5	<p>should not be identified as one of the key objectives of the Plan.</p> <p>115. Blakeney Channel is not be within the area that can be controlled by NNDC (or a neighbourhood plan) under Town and Country Planning legislation and is, in fact, the responsibility of the Marine Management Organisation (MMO). The MMO license, regulate and plan marine activities in the seas around England so that they're carried out in a sustainable way. MMO is an executive non-departmental public body, sponsored by the Department for Environment, Food & Rural Affairs.</p> <p><u>'Sustainable Growth and Development'</u></p> <p>116. Sections 5.16 to 5.32 needs rewriting to add the clarity that the Core Strategy allocation is now built out and fully occupied.</p> <p>117. This section may well want to conclude that the proposed allocation in the emerging Local Plan may not fully meet the local needs but it must be stated (in order to be accurate) that the allocation is indented to go some way as to meet District needs. In reference to the proposed allocation, this section should provide an explanation of the site assessment process and that, on balance, this site was chosen from other options. All options have been consulted on and are in the public domain.</p>	<p>as an objective with the aspiration being delivered through project work.</p> <p>Comment noted and the Blakeney Channel is beyond the scope of the Blakeney Neighbourhood Plan.</p> <p>Comment noted. Paragraph 5,21 states in its penultimate sentence "Development of allocation site BLA03 has now been completed and occupied.</p> <p>Comment noted. The local housing need should be reflected in the District needs although it is appreciated the local need may be delivered elsewhere within the District.</p> <p>Comment noted. Paragraph 5.24 outlines the 'call for sites' and Map 4 illustrates the 10 sites that were assessed. It is not the place of the Blakeney Neighbourhood Plan to explain the site assessment process. However, in an earlier comment (No.3)</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
	Policy 1	<p>118. Overall this section fails to explain a key point – which is how the plan could contribute to sustainable development in the village by allocating sites for growth. It could be explained in this section that by using the detailed and comprehensive information in the site assessment the Blakeney Plan could take this work forward and seek to identify further sites for growth which could be used to meet the local need through an allocation in the Blakeney Plan.</p> <p>Theme 1: Built Environment</p> <p>Policy 1: Affordable Homes for Local People</p> <p>119. The stated 'Ambition' in the Plan is: <i>Affordable Homes for Local People – seeking to create the opportunity for residents of Blakeney or those with connections to Blakeney who are on the housing list, priority to access affordable housing in Blakeney.</i></p> <p>120. In para 6.13 the presentation and analysis of the Census and other data is somewhat misleading. The data presented, and the conclusions drawn, is based on a comparison of Blakeney with the County of Norfolk and England. There has been no comparison with the District data or comparison with similar parishes in the district. A comparison of Blakeney with North Norfolk and the Glaven Valley Ward suggests a significantly different picture than that</p>	<p>paragraph 5.31 will have additional text to reflect the choice in site NNDC has made.</p> <p>Comment noted. As per earlier responses Blakeney Neighbourhood Plan does not seek to allocate additional housing. The identification and allocation of sites is the role of the emerging Local Plan, which needs to allocate more sites – as per draft Policy SD3 – to meet the identified housing need. Until this is finalised and adopted there could be changes to the emerging Local Plan that impact on Blakeney.</p> <p>Comment noted.</p> <p>Comment noted. The comparison with Norfolk and England is valid and illustrates a picture for Blakeney in relations to these wider areas, this is not misleading. Different comparisons could be undertaken with other coastal villages or North Norfolk which may or may not alter the picture a little, but these may detract from the significant difference that Blakeney has to Norfolk and England.</p>

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		<p>presented in the Plan. See commentary in the 'Evidence' section below.</p> <p>121. In paras. 6.19 to 6.29 the information relating to the Blakeney Neighbourhood Housing Society, albeit interesting, does not add anything substantially to the evidence base for the Plan.</p> <p>122. At para. 6.30 there is an incorrect reference to current Core Strategy policy. The requirement to provide affordable homes applies to 10 or more dwellings and not the 11 or more stated in this para.</p> <p>123. The discussions with officers and the overall view of NNDC is misrepresented at paras. 6.43 to 6.46. Planning and Housing Officers' have provided the Parish Council and steering group with clarification on this matter on a number of occasions. The context of any discussion, around need and application of a local connection criteria, must be considered against the significant general concerns that officers raised in relation to the suggested policy approach at the meeting and in written representations. These concerns are re-iterated at paras. 19 to 31 of this representation.</p> <p><u>Evidential basis of Policy 1</u></p>	<p>Comment noted. Blakeney Neighbourhood Housing Society plays an important role in the provision of low-cost housing for local people. The inclusion demonstrates that the community of Blakeney have, and will continue to do so, sought and delivered alternative solutions to the problem of affordability of homes as part of meeting the local need.</p> <p>Comment noted and will be corrected.</p> <p>Comment noted. Please see the earlier response above (28). Clarification was sought prior to the inclusion of paragraph 6.44 from the Housing Strategy & Delivery Manager. His emailed response was received on 12th September 2019 which finished this the words.... <i>"This is my own view and is not the policy as outlined above. I think I made the point in relation to the suggestion to make some affordable housing on an allocated site for local priority. In my view the numbers being so small as to not have a significant impact on the overall policy."</i></p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
		<p>124. The preparation of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.</p> <p>125. Please see paras. 19 to 38 for detailed comments in relation to affordable housing and setting a housing target.</p> <p><u>Census and other data</u></p> <p>126. The data presented paints a distorted view and offers unhelpful comparisons with</p>	<p>Comments noted. The evidence does underpin Policy 1 of the Blakeney Neighbourhood Plan. Information contained in paragraphs 6.32 to 6.39 has been provided by NNDC and should be taken as accurate and up to date at the time (October 2018). It is proportionate and factually true in robustly demonstrating the housing need – General Need 706 households and Local Need 79 - therefore, establishing the 'local need'.</p> <p>Once the Blakeney Neighbourhood Plan is 'made' and Policy 1 applied it will be necessary for the up to date number of 'Local Need' to be established from NNDC Housing List – it is understood this is an easy and quick process from NNDC data base, as per the data query run in October 2018 – as the new affordable homes are built and come available for allocation using the priority criteria in Policy 1 of the Blakeney Neighbourhood Plan.</p> <p>If at that time the up to date information has no households with 'Local Need' then, as per the priority criteria in Policy 1 of the Blakeney Neighbourhood Plan, the affordable home(s) would be allocated to meet the District-wide need. As described in Paragraph 6.50.</p> <p>Comment noted. Please see earlier responses above at (19 to 38).</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
		<p>Norfolk and England. When Blakeney is compared to the District and the Ward it is a significantly different picture. What the Blakeney data actually suggests is that, in many regards, the village is similar to other villages in the area and the District as a whole.</p> <p>127. As an example in Figure 3, 'Housing Type', the information presented and the conclusions state that <i>"Despite having significantly more one and two person households the housing mix in Blakeney, recorded in the 2011 Census, is dominated by detached homes, 54%, significantly higher than Norfolk and England at 39% and 22% respectively."</i> Firstly, it appears the data is incorrect. Secondly, when Blakeney is compared with the Glaven Valley Ward and with the District - the statistic for 'detached homes' paints a significantly different picture. Blakeney has 43% (correct figure not 54%), 47.3% in the Glaven Valley and 44% in North Norfolk as a whole. Therefore, Blakeney has actually less detached homes than the Glaven Valley and North Norfolk averages. It also has significantly more 'terrace' properties at 25% than the District (16.2%) and the Glaven Valley Ward (18.9%).</p> <p>128. This presentation and interpretation of the Census and other data is important as it sets the scene and is the justification for much of what follows in relation to housing mix, affordability and the need for homes for local people. Given the distorted and incorrect</p>	<p>Comment noted. Please see earlier response (120) above.</p> <p>Comments noted.</p> <p>Comment noted. The data will be checked and, if necessary, corrected.</p> <p>Comment noted. Using the numbers quoted this still demonstrates that 77% of households are one or two persons in size while over 90% of housing (c673 homes) are of two or more bedrooms.</p> <p>Comment noted. However, as per the response above (127), this does not alter the justification and the evidence supports this.</p>

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		<p>nature of the census and other data in the Plan there is a lack of confidence in the remainder of the census related evidence presented.</p> <p>129. When taking into account the presentation of the Census data and the potentially incomplete need data – the Plan has simply not put across an evidential justification for the Policy 1.</p> <p><u>Clarity and effectiveness of Policy 1</u></p> <p>130. Notwithstanding the significant concerns around the evidence and how this evidence has informed and justified the policy – there are concerns regarding how effective this policy will be. There are no outstanding allocations in the village and the policy will only apply to new residential developments in Blakeney over 10 dwellings. It appears there have been no developments in the village in the last 10 years of 10 or more dwellings, (other than the Core Strategy allocation) Looking at the available land within the settlement boundary – it is unlikely that any proposals for 10 or more dwellings would come forward.</p>	<p>Policy 1 of the Blakeney Neighbourhood Plan is about creating the opportunity for local households and people with local connections to access affordable homes in Blakeney.</p> <p>Comment noted. NNDC has accepted there is a 'Local Need' for housing and has included this in the emerging Local Plan, paragraph 7.20 as part of the third criteria, including Blakeney, to state</p> <ul style="list-style-type: none"> • “these locations have high levels of need for affordable homes and allowing development here will enable the delivery of more affordable homes where they are most needed” <p>Comments noted. The emerging Local Plan has a proposed allocation for Blakeney of c30 new homes which will deliver either 10 or 11 new affordable homes (subject to the exact drafting, adoption and application of the relevant policy in the emerging Local Plan). There seems confusion with NNDC as, once 'made' the Blakeney Neighbourhood Plan policies will apply to this proposed allocation (if planning permission has not already been granted). Therefore, in this scenario, Policy 1 of the Blakeney Neighbourhood Plan will make these affordable homes available based on the priority contained in the Policy.</p>

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		<p>131. The Plan or policy does not quantify how a person would qualify as a 'former resident' of the parish. An open interpretation could allow for a residence period of 1 day, 1 week or 1 year. This is not clear or explained in the justification or policy.</p>	<p>Alternatively, a developer could bring forward the planning application prior to the emerging Local Plan being adopted but after the Blakeney Neighbourhood Plan is 'made'. In this scenario, the Core Strategy Policy HO2 would apply (50% of the housing would be for affordable homes) resulting in 15 affordable homes. Policy 1 of the Blakeney Neighbourhood Plan would also apply and will make these affordable homes available based on the priority contained in the Policy.</p> <p>A third scenario where full (detailed or reserved matters) planning permission is granted prior to the Blakeney Neighbourhood Plan being 'made', in which case the Policy 1 of the Blakeney Neighbourhood Plan would not be applied, and these new affordable homes would be allocated based on NNDC's Housing Policy.</p> <p>Should further development proposals come forward that deliver affordable homes as part of the planning permission granted during the plan period of the 'made' Blakeney Neighbourhood Plan. In this scenario (however unlikely) Policy 1 of the Blakeney Neighbourhood Plan apply and will make these affordable homes available based on the priority contained in the Policy.</p> <p>Comment noted. Policy 1 of the Blakeney Neighbourhood Plan is clear. There is no stipulated or qualifying period in any of the priority criteria in Policy 1, therefore, any period of time qualifies.</p> <p>The Steering Group have spent many hours going through different time periods, as well as different</p>

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		<p>132. The final para. of the policy talks of 'letting'. In line with revised government policy and guidance affordable housing products could also include discounted sale or shared ownership dwellings and not exclusively rented dwellings. Does this policy only apply to 'let' dwellings?</p> <p>Conclusions</p> <p>133. Occupation is not a land use matter for Planning and there is no justification in national policy. This policy does not contribute, in a meaningful way, to delivering sustainable development.</p> <p>The policy is conflict with policies in the Core Strategy and Council's housing strategy aligned to statutory housing provision and is discriminatory.</p>	<p>criteria, before deciding on the criteria now detailed in Policy 1 of the Blakeney Neighbourhood Plan. It was felt that any time period would be arbitrary and possibly divisive. Ultimately, the conclusion reached was that if there was a household in need than why should a time period, that really had not relevance to the situation, get in the way of that need being successful met.</p> <p>Comment noted. The application of Policy 1 of the Blakeney Neighbourhood is for affordable homes that are rented. At this time, it is difficult to see how any authority could exercise control over 'owned' products without changes to the current regulations. As this is an area government policy is likely to continue to develop and future revisions expected this may be a possible update to the Policy 1 of the Blakeney Neighbourhood in the future.</p> <p>Comment noted. However, the exception has long been established in 'exception sites' and using the same inbuilt flexibility in all Housing Allocation Policies many 'made' Neighbourhood Plans and some Local Plans (there are at least two in Norfolk) have successfully implemented local allocation policies.</p> <p>Comment noted. As the Core Strategy and emerging Local Plan are both silent on local allocation then Policy 1 of the Blakeney Neighbourhood Plan is NOT in conflict with either the Core Strategy or the emerging Local Plan.</p> <p>In relation to NNDC's housing strategy and Housing Policy; NNDC's Housing Strategy & Delivery Manager</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
		<p>It is clear that Plan has not had regard to national policies and advice contained in guidance issued by the Secretary of State - in producing this policy. Therefore this policy does not meet the Basic Conditions tests.</p>	<p>has emailed, dated 12th September 2019, to confirm his view that.... <i>"In my view the numbers being so small (affordable homes in Blakeney) as to not have a significant impact on the overall policy."</i> Therefore, not impacting on the statutory housing provision and is not discriminatory.</p> <p>Where other Norfolk Districts have implemented a local allocations policy, to date there has been no challenge to the allocations made – either discriminatory or otherwise.</p> <p>Comment noted. However, it is clear from responses above that the Blakeney Neighbourhood Plan has regard to national policy, as has guidance from the government body Locality, many other 'made' Neighbourhood Plans and at least two other District Councils in Norfolk.</p> <p>There is no guidance from "the Secretary of State" (is this why NNDC has chosen not to list it). The Ministry for Housing, Communities and Local Government has put out guidance through the government body Locality that states...</p> <p>"Homes for locals - this is one of the most frequently addressed topics in neighbourhood planning. The process of allocating social housing is a matter for housing management and not planning policy but requirements can be managed by legal agreement. It can be a complex area and one where it is well worth talking to the local authority housing team to avoid any risk of conflict with EU rules around free movement."</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
		<p style="text-align: center;"><u>Recommendations</u></p> <p>134. Policy 1 should be removed from the Plan.</p> <p>135. However, as a way forward and in order to meet the aspirations the Plan should either:</p> <p style="padding-left: 40px;">a) allocate additional growth based on local needs in line with an agreed housing target with the LPA, a proportion would require to be affordable in line with strategic policies and occupation through the councils statutory housing allocation policies, or;</p> <p style="padding-left: 40px;">b) alternatively, the plan could seek to identify 100% affordable sites which would then be subject to the established strategic approach and core strategy policy on occupation as found on rural exception sites. This way the NP would be in conformity with the strategic policies and also achieve its' aim of local occupancy.</p> <p>As previously advised, any Neighbourhood Plan allocation cannot seek to favour a specific provider, such as Blakeney Housing Trust. Should the Parish Council wish to be</p>	<p>Source: Locality Writing Planning Policies (page 19), by Tony Burton.</p> <p>Policy 1 of the Blakeney Neighbourhood Plan meets the Basic Conditions tests, in the same way the local allocation policy in so many other 'made' Neighbourhood Plans has.</p> <p>Comment noted. Policy 1 will remain in the Blakeney Neighbourhood Plan.</p> <p>Comment noted, however, NNDC should recognise this is Policy and not an aspiration.</p> <p>Comment noted. NNDC should realise the Blakeney Neighbourhood Plan does not seek to allocate additional housing.</p> <p>Comment noted. Due to the current position of the emerging Local Plan and the opportunities it presents no landowner is interested in being forward proposals for rural exception sites at this time. Therefore, the Blakeney Neighbourhood Plan does not seek to allocate additional housing.</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
	Policy 2	<p>involved in developing a site it needs to set up a Community Land Trust and take further advice from the Housing Strategy officers.</p> <p>Policy 2: Managing Second Home Ownership</p> <p>136. The stated 'Ambition' in the Plan is: <i>Managing Second Home Ownership – seeking to safeguard the sustainability of Blakeney village to make homes more affordable and available to the local community by limiting the number of second homes and increasing the number of principal homes.</i></p> <p>137. Para 6.59 is taken almost verbatim from the St Ives NP with the only difference being changing the name from St Ives to Blakeney. It is not acceptable to take such justification from another neighbourhood plan, which has been Made, and directly transpose this text into the Plan.</p> <p>The St Ives Plan would have its own evidence base and unique local context that would have persuaded the Inspector that the policy meets the basic conditions. One of those</p>	<p>Comment noted.</p> <p>Comment noted. The Ambition statement will be reworded reflect the key goal of increasing the number of principal homes in Blakeney.</p> <p>Comment note. The paragraph, one of two used to justify H2 Principle Residence Requirement in St Ives Neighbourhood Plan, is well written. As drafted is concise, informative and acceptable to the Examiner. Why wouldn't it be used as a base statement as part of the justification if, as it does, a similar issue exists in Blakeney.</p> <p>The Blakeney Neighbourhood Plan has nine other paragraphs as part of its justification. The proportionate evidence required to support this Policy 2 of the Blakeney Neighbourhood Plan has been provided including the number of second homes and holiday homes (eligible to pay business rates rather than council tax).</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
		<p>included the acceptance and identification of additional housing growth.</p>	<p>Comment noted. However, it is misleading of NNDC Officers to make a misleading analysis of the Examiner's report.</p> <p>Each policy in its own right is required to meet the Basic Conditions. Nowhere in the Examiner's comments and considerations does the Examiner state that she has been persuaded by "the acceptance and identification of additional housing growth".</p> <p>In her fourth paragraph, see below, she clearly states why after much deliberation she concludes the policy does contribute to delivering sustainable development and, therefore, does meet the Basic Conditions.</p> <p>Due to the serious nature of the comment it has been felt appropriate to include the details from the Examiner's report.</p> <p>The Examiner's comments from her report on St Ives Neighbourhood Plan dated 2nd December 2015 on Policy H2 Principle Residence Requirement are below.</p> <p><i>"I have given very serious consideration as to whether or not I can find that this policy meets the Basic Conditions. I compared this policy to other similar ones, which have been accepted by other Neighbourhood Plan examiners and although this has been helpful they have been different in context and wording.</i></p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
			<p><i>My concerns relate how the policy can meet the Basic Conditions particularly having regard to the NPPF – “delivering a wide choice of quality homes” and “delivering sustainable development “along with how the policy meets the requirements of European legislation.</i></p> <p><i>I have considered carefully the representations received in relation to this policy, including the potential for unforeseen consequences on the local housing market and the future delivery of affordable housing, as highlighted in the Cornwall Council Affordable Housing response to the policy.</i></p> <p><i>After much deliberation and on balance I have concluded that due to the adverse impact on the local community/economy of the uncontrolled growth of second homes the restriction of further second homes does in fact contribute to delivering sustainable development. In terms of “delivering a wide choice of quality homes”, I consider that the restriction could in fact be considered as facilitating the delivery of the types of homes identified as being needed within the community.</i></p> <p><i>I understand the aim behind including “holiday lets” within this policy as it relates to the letting of second homes but I have concerns that the inclusion of it in this way will result in confusion with proposals for new self catering accommodation, run as a business that is at the core of supporting tourism and would in my opinion be in conflict with the NPPF. I consider that careful rewording of the policy will remove this issue.</i></p>

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			<p><i>In addition to my “in principle” concerns I also have concerns about the precise wording of the policy and in its current form I am not convinced it will deliver the desired outcome.”</i></p> <p>The original Policy H2 as drafted for Examination was <i>“H2 Full Time Principal Residence Requirement New Open Market Housing without a restriction to ensure its occupation as a Full Time Principal Residence (occupied for at least 270 days per year) will not be permitted. Sufficient guarantee must be provided of such occupancy through the imposition of a planning condition. New second homes and holiday lets will not be permitted at any time.”</i></p> <p>The Examiner re-drafted the policy to the one that is now in the St Ives Neighbourhood Plan below.</p> <p><i>“H2 Full Time Principal Residence Requirement Due to the impact upon the local housing market of the continued uncontrolled growth of dwellings used for holiday accommodation (as second or holiday homes) new open market housing will only be supported where there is a restriction to ensure its occupation as a Principal Residence. Sufficient guarantee must be provided of such occupancy restriction through the imposition of a planning condition or legal agreement. New unrestricted second homes will not be supported at any time. Principal residences are defined as those occupied as the residents’ sole or main residence, where the resident spends the majority of their time when not working away from home or living abroad.</i>”</p>

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		<p>138. It is worth reading the inspectors report on the St Ives plan. The inspector had “concerns relate how the policy can meet the Basic Conditions particularly having regard to the NPPF – delivering a wide choice of quality homes and delivering sustainable development along with how the policy meets the requirements of European legislation”. The inspector considered the potential for “unforeseen consequences on the local housing market and the future delivery of affordable housing”. The Inspector concluded that “due to the adverse impact on the local community/economy of the uncontrolled growth of second homes the restriction of further second homes does in fact contribute to delivering sustainable development”. The important point to take from this is that the Inspector was presented with compelling evidence which enabled him to come to an ‘on balance’ view that the policy is acceptable.</p>	<p><i>The condition or obligation on new open market homes will require that they are occupied by the owner or their tenants as their primary (principal) residence. Owners of homes with a Principal Residence condition will be required to keep proof that they are meeting the obligation or condition, and be willing to provide this proof if/when Cornwall Council requests this information. Proof of Principal Residence is via verifiable evidence including (but not limited to) residents being registered on the local electoral register and being registered for and attending local services (such as healthcare, schools, etc.).</i></p> <p>Source: Independent Examiners Report on the St.Ives Neighbourhood Plan (dated 2nd December 2015)</p> <p>Comment noted. See the Examiner’s report above on the St Ives Neighbourhood Plan dated 2nd December 2015 on Policy H2 Principle Residence Requirement. It is clear from her deliberations that this is not an easy problem to resolve.</p> <p>In the emerging Local Plan, in section 9: Housing Policies NNDC presents the issue of second home ownership and vacant homes. Stating</p> <p>9.2Concerns have been expressed in these locations (<i>which include Blakeney</i>) about how such high proportions impact on the long term sustainability of settlements, potentially inflating house prices well beyond the reach of those in local employment and reducing the long term viability of rural services.”</p>

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		<p>139. Table 1 table is again a misrepresentation of the facts. The full table and up-to-date percentages is presented below</p>	<p>9.5 In those areas of the District where the proportion of second homes is particularly high, such as in the coastal parishes in the area between Sheringham and Wells (<i>which include Blakeney</i>), this Plan proposes very limited new housing growth. This reflects the fact that most of this area lies within the Norfolk Coast Area of Outstanding Natural Beauty and that few communities have the range of day-to-day services which are desirable to support new development. A significant proportion of the limited amount of new homes built in this area will be subject to affordable housing occupancy restrictions and hence would not be available for second home use.</p> <p>9.6.....the remainder could be subject to a condition limiting use to permanent occupancy. Currently, the Council considers that imposing such conditions is likely to deflect the demand for second home accommodation onto the existing housing stock, the use of which is outside the Council's control. Permanent occupancy conditions are therefore unlikely to be an effective mechanism for controlling the overall proportion of second homes in the area. The counter-argument is that, given the near-impossibility of locals buying property in those areas, it is better to do what is possible, rather than to do nothing: safeguarding a few houses for permanent residents is worthwhile in its own right.</p> <p>9.8 The Council will reconsider this issue following this consultation but is currently not minded to impose second home occupancy restrictions. We would welcome comments on this area of policy, and in particular any evidence about the impacts of</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action																								
		<table border="1" data-bbox="595 268 1276 395"> <thead> <tr> <th></th> <th>total dwellings</th> <th>2nd home council tax data</th> <th>holiday homes, business rates</th> <th>percentage second homes</th> <th>% second homes and holiday lets</th> </tr> </thead> <tbody> <tr> <td>2018 - 2019</td> <td>705</td> <td>178</td> <td>125</td> <td>30.7</td> <td>43.0</td> </tr> <tr> <td>2017 - 2018</td> <td>711</td> <td>178</td> <td>127</td> <td>30.3</td> <td>42.8</td> </tr> <tr> <td>2016 - 2017</td> <td>696</td> <td>180</td> <td>124</td> <td>31.1</td> <td>43.7</td> </tr> </tbody> </table> <p data-bbox="595 395 788 414">Source NNDC April 1st 2019</p> <p data-bbox="640 488 1281 778">140. Care needs to be taken to establish the correct percentages and to explain the differences between second homes, and holiday lets. It is suggested that the evidence for Blakeney should also consider the establishment and use of occupation rates of the second/holiday units rather than just the simple and often misleading percentage figures.</p> <p data-bbox="640 817 1281 1075">141. Blakeney is an all year round tourism destination and as such high occupation rates may well support the high level of service provision that without that available income might not be there. This is a positive influence on sustainability and allows the small settlement to punch above its weight in service provision.</p> <p data-bbox="640 1114 1281 1407">142. With respect para 6.62 - has any advice been taken as to whether this would be legal, that said, it's not mentioned or reflected in the policy. It would potentially devalue every market property under this regime by a minimum 20%. Has the Plan considered the impact on Human Rights and ability for purchasers to get a mortgage? Suggest that this para. is deleted.</p>		total dwellings	2 nd home council tax data	holiday homes, business rates	percentage second homes	% second homes and holiday lets	2018 - 2019	705	178	125	30.7	43.0	2017 - 2018	711	178	127	30.3	42.8	2016 - 2017	696	180	124	31.1	43.7	<p data-bbox="1330 255 2011 319">second home ownership and how such impact might be addressed in response to this consultation.</p> <p data-bbox="1330 354 2011 513">Comments noted, However, all the numbers in the table are correct (the ones provided by the NNDC Planning Policy Team Leader, in December 2018). The table will be updated with the new data provided.</p> <p data-bbox="1330 750 2011 813">Comments noted. Text will be updated to reflect the new data provided.</p> <p data-bbox="1330 1085 1559 1117">Comment noted.</p> <p data-bbox="1330 1378 1818 1410">Comment noted and will be deleted.</p>
	total dwellings	2 nd home council tax data	holiday homes, business rates	percentage second homes	% second homes and holiday lets																						
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		<p><u>Evidential basis of Policy 2</u></p> <p>143. The Plan needs to consider how the evidence supports any assertion that the sustainability of Blakeney has been affected in respect the economic and social objectives of sustainable development. Please see the information, above for detailed comments in relation to affordable housing and setting a housing target.</p> <p>144. As it currently stands this policy is not sufficiently justified with clear evidence. Whilst the data from 2017 and 2018, as misleadingly presented, portrays high levels of second home ownership at a point in time, it doesn't necessary demonstrate a trend or a pattern in Blakeney. The remedy to the evidential approach is discussed above.</p> <p>145. Given the proposed introduction of this policy, it would be expected that the Plan's evidence base could demonstrate that the second homes market is having a detrimental impact on the sustainability of Blakeney. i.e. to back up the claim at 6.57 that the 'community has been eroded'. This would be evidenced through factors such as the loss of community facilities such as schools or shops, of the restriction of the provision of services through actions such as seasonal opening only. At present the plan provides no evidence, other than the <i>perceived</i> high</p>	<p>Comment noted.</p> <p>Comment noted. In December 2018, the Planning Policy Team Leader at NNDC provided detailed numbers and suggested wording to be used.</p> <p>Comment noted.</p>

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		<p>house prices to demonstrate that this is actually the case.</p> <p>146. Communities and society has changed over the past 20 years. House prices across the country have increased, outstripping affordability in many areas, the retail sector and high street is going through a seismic transformation, the tourism and holiday environment is ever changing, as are the overarching demographics.</p> <p>147. As discussed in more detail below, the economy and services in Blakeney appears buoyant. However, if the evidence for Blakeney suggests that there has been a change in the fabric of the community, and its services, over a period of time – how much of this change can be directly attributed to second homes and not to other wider economic, demographic and social factors?</p> <p><u>Impact on services in Blakeney</u></p> <p>148. Blakeney is a village with a resident population of 775 (2011 census) which maintains a village school, doctor's surgery, small convenience store (including a Post office), 2 pubs, a hotel, a petrol filling station, village hall and a range of other services and shopping opportunities. This range of services compares favourably with all other villages of a similar size (and even larger) in the district and it can be argued that Blakeney appears to punch above its weight in respect the level</p>	<p>Comments noted.</p> <p>Comments noted.</p> <p>Comments noted,</p>

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		<p>of services on offer. When you look at those villages that are comparable in population (and larger) which have average or low levels of second home ownership - they all have significantly less services than Blakeney.</p> <p>149. In conclusion, there appears to be no correlation between high levels of second homes and a negative impact on the provision of services in Blakeney, therefore, it is suggested the erosion of services in Blakeney cannot be used as an evidential basis for the introduction of a principle residence policy.</p> <p><u>House prices in Blakeney</u></p> <p>150. There are a number of complex and interrelated factors which have an influence on houses prices in Blakeney. The attractive and environmentally constrained location of the village, the broad range of services that are available, attractiveness to the retirement market, the buoyancy of the holiday and second homes market and the general demand versus the lack of supply – are all factors that work together on the housing market and potentially increase house prices.</p> <p>151. It is not clear from the scant evidence presented in the Plan that by restricting a small amount of second homes in the village through the introduction of this policy that it would actually influence (decrease) house prices in the village. Without further evidence therefore, the case that second homes have</p>	<p>Comment noted. The statements within the emerging Local Plan in paragraphs 9.2 to 9.8 details the negative impact on the long-term sustainability of Blakeney.</p> <p>Comments noted. These are some of the market drivers that can influence house prices in Blakeney and many other areas, there are other possible drivers – BREXIT or 5-year land supply – are current ones that springs to mind.</p>

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		<p>had such a significant impact on house prices that it warrants a principle residence policy has not been made.</p> <p><u>Unintended consequences.</u></p> <p>152. The unintended consequence of the policy could be to impact on the overall viability of a development considering that a significant element of the house buying market may have been excluded from purchasing a property, which could have a knock on impact on sale values and saleability. If the viability of a development is tested and pushed to the margins then there is the potential to adversely impact on the delivery of affordable housing, which is often one of the elements that is negotiated down in marginal viability cases. The policy could actually impact on the viability to such a degree it could prevent development from taking place at all. The Plan is silent on these issues and it is suggested that you should certainly explain that the potential impact on viability has taken into account when assessing whether the policy is appropriate, proportionate and should be introduced.</p>	<p>Comments noted. Affordability is only one aspect of maintaining a sustainable community going forward. Yes, we want our children to be able to afford to buy or rent a home in Blakeney in the long-term. The other key aspect is to have homes that are used rather than standing empty for vast periods of the year. There is a danger of Blakeney becoming a 'ghost village'. Concerns are being raised about the possible impact on crime levels with more and more homes left empty. While second homeowners seek to implement security measure – usually lighting – this then has the subsequent result of causing light pollution and impacting on dark skies.</p> <p>Comments noted. There is always a risk of unintended consequences of decisions taken. Through the iterative process of developing the Blakeney Neighbourhood Plan the risk of possible policy unintended consequences has been considered and, where possible, mitigation taken in the policy wording to be specific in actions and the intended outcome. The evidence from other made Neighbourhood Plans is that this has not been the case. While this is reassuring it does not guarantee anything.</p> <p>Cornwall and specifically St.Ives analysis on changes in new house pricing.</p> <ul style="list-style-type: none"> • St. Ives decrease by 14% • St. Austell prices of new housing fell by 43%. • Wadebridge new house prices were down by 38%. • Lanreath and Duloe the fall was 18%.

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		<p>153. A further unintended effect of the introduction of such a policy is that it does create a 2-tier housing market in which new dwellings developed under this policy will have a potentially lower market value than the existing unfettered housing stock (which would pre-date the introduction of any prime occupancy restriction). This situation is inequitable to new home buyers and unintentionally places a premium on the value of unfettered existing housing (which will be the majority) and may well increase house prices in the unrestricted stock and in the village as a whole.</p> <p>154. There is no evidence that the policy will actually reduce the percentage of second homes. The demand will still be there - as a person will simply be able to purchase one of the 100's of houses in Blakeney that are unrestricted.</p>	<ul style="list-style-type: none"> • St. Minver and St. Kew it was 17%. <p>Other than St Ives none of these places above has a ban on new build second homes in this period.</p> <p>Prices of existing housing stock in coastal areas of Cornwall: -</p> <ul style="list-style-type: none"> • St. Ives increased by 28% • West Penwith the rise was 30% • Roseland 27% increase • Wadebridge up by 28% • In parts of Falmouth increased by 29% • Padstow and St Merryn a rise of 35%. <p>Other than St. Ives none of these areas was there a ban on new build second homes in this period.</p> <p>This demonstrates that a principle home policy, in its self, will not cause viability issues.</p> <p>Comment noted. Again, there is a risk – who knows? Only 'hind-sight' will provide the answer to the Blakeney housing market. The evidence published in Cornwall gives a degree of confidence that this will not happen.</p> <p>It is generally accepted that new homes attract a premium price over existing or older homes – this could be seen as an unintended consequence of building new homes – it does not mean the outcome is right or wrong.</p>

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		<p style="text-align: center;"><u>Clarity and effectiveness of Policy 2</u></p> <p>155. In para 6.56 the extremely modest influence of this policy is acknowledged. Notwithstanding the lack of evidence, this must raise questions as to the need for such a policy.</p>	<p>Comment noted. There is no evidence to the contra either. The emerging Local Plan, in paragraph 9.3 states “The use of an existing dwelling as a second home is not defined in planning legislation as development and hence does not require planning permission. This means that the Council is unable to control the use of the existing housing stock as a second home through planning policies.” And is explained in paragraph 6.63 of the Blakeney Neighbourhood Plan. The existing housing stock is something that cannot be address within current legislation.</p> <p>Blakeney Neighbourhood Plan seeks to do what it can in the areas that it can make a small difference. These being new homes (Policy 2) and holiday accommodation change of use from sui generis to dwellinghouse C3 (Policy 4).</p> <p>Comment noted. The emerging Local Plan, in paragraph 9.6 “.....The counter-argument is that, given the near-impossibility of locals buying property in those areas, it is better to do what is possible, rather than to do nothing: safeguarding a few houses for permanent residents is worthwhile in its own right.”</p> <p>The Steering Group, after much consideration and discussion, has reached the conclusion it is better for the local community to do something. If not things will just continue.</p> <p>In the emerging Local Plan, paragraph 9.8, NNDC indicate that this issue will be reconsidered following the consultation on the initial draft of Part 1 of the</p>

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		<p>156. The Policy 2 wording is a copy of Policy H2 in the St Ives Neighbourhood Plan. It may be tempting to take a policy out of a 'Made' local plan and transpose it into the Plan, however, this suggests that there has not been a locally focused approach to the development of this policy in the Plan. It also goes some way to confirm, for reasons stated above, that the policy is not underpinned by relevant and up-to-date, locally derived, evidence.</p> <p>157. The specific exclusion of replacement dwellings undermines this policy. Blakeney has been subject to a high volume of planning applications for replacement dwellings which are substantially larger than the relatively modest existing dwellings (often bungalows</p>	<p>emerging Local Plan. This seems to indicate that the strength of opinion voiced, rather than evidence, will be the overarching factor. It is recognised by the community of Blakeney that this is a choice – whether to taken action or not – and will ultimately be tested at the referendum on the Blakeney Neighbourhood Plan as it is the local community who have the final say.</p> <p>Comment noted. The inference by NNDC is wrong. NNDC are aware of the issue, it is detailed in the emerging Local Plan, and has kindly provided assistance and evidence in the development of the approach for Blakeney. The NNDC Planning Policy Team Leader, in December 2018, provided detailed numbers and suggested wording. The local approach has been developed through the community events and details of the outcomes are presented in the Emerging Policy Statements Discussion Document (August 2018) that was used to inform policy choice and development. The Emerging Policy Statements Discussion Document can be viewed in the Consultation Statement document.</p> <p>Whilst the wording is similar to the St.Ives Neighbourhood Plan Policy H2 , that is seen as a good thing as this wording was actually drafted by the Examiner of the St.Ives Neighbourhood Plan and, therefore, most likely to have the desired outcome to meet the ambition and meet the Basic Conditions test. Similar policies in other Neighbourhood Plans were also looked at. Additional wording has been added to being clarity of requirement and detailed specific action.</p>

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		<p>within sizable plots) and which are subsequently used as second homes.</p> <p>Conclusions</p> <p>158. The justification for Policy 2 does not present a clear, robust, evidence base that is derived from local intelligence and data. It simply does not adequately consider the pattern of house prices, the growth of second homes and the alleged disenfranchisement of local people from the local housing market. It fails to provide a robust correlation between any relevant factors and second home ownership. No balanced information or evidence has been produced concerning both the negative and positive effects of second homes in the village.</p> <p>159. This policy does not contribute, in a meaningful way, to delivering sustainable development.</p> <p>The policy is conflict with policies in the Core Strategy. Therefore, when also taking into account the lack of a robust and locally derived evidence base it is clear that Plan has not had regard to national policies and advice contained in guidance issued by the Secretary of State - in producing this policy. Therefore this policy does not meet the Basic Conditions tests.</p>	<p>Comment noted. The comment seems to indicate that NNDC would support the inclusion of replacement homes within the scope of Policy 2 of the Blakeney Neighbourhood Plan. However attractive to do so the Steering Group felt it would be unfair to impose this on existing homeowners who would have purchased their homes without this restriction being in place at the time. Whereas, future homeowners of new homes are making the choice to buy knowing all the facts.</p> <p>Comment noted. Policy 2 of the Blakeney Neighbourhood Plan is clear and based on the evidence provided by and further supported by the emerging Local Plan. Subsequent data is now available although recognised that it is questionable if too soon to read anything into the analysis. The data and analysis will now be added to the supporting text.</p> <p>Comments noted. Responses above outline how Policy 2 of the Blakeney Neighbourhood Plan does contribute to sustainable development.</p> <p>Comment noted. The Core Strategy is silent on second home ownership which means the that Policy 2 of the Blakeney Neighbourhood Plan is NOT in conflict with the Core Strategy.</p>

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	Policy 3	<p style="text-align: center;"><u>Recommendations</u></p> <p>160. Policy 2 should be removed from the Plan.</p> <p>Policy 3: Change of use from Residential to Holiday Accommodation</p> <p>161. The stated 'Ambition' in the Plan is: <i>Change of use from Residential to Holiday Accommodation seeking to limit the loss of homes to holiday lets.</i></p> <p>162. This policy and justification appears to have been copied from the North Northumberland Coast Neighbourhood Plan. As with Policy 2, this policy must be informed by appropriate and proportionate evidence that is locally derived in relation to the issue that the policy is intending to influence and should be justified on the specific local circumstances. The North Northumberland Neighbourhood Coast Plan had its own evidence base and local context and, in fact, had a comprehensive 'Housing Evidence Paper' which fully justified the inclusion of this and other policies which is why the examining</p>	<p>The emerging Local Plan does have a section (paragraphs 9.2 to 9.8) on second home ownership, however, the emerging Local Plan has no proposed policy and states in paragraph 9.8 " The Council will reconsider this issue following this consultation but is currently not minded to impose second home occupancy restrictions." As the emerging Local Plan is inconclusive on which way it will finally go it is appropriate for Blakeney Neighbourhood Plan to have a policy for its Neighbourhood Area. Therefore, Policy 2 of the Blakeney Neighbourhood Plan is NOT in conflict with the emerging Local Plan.</p> <p>Comment noted. Policy 2 of the Blakeney Neighbourhood Plan will remain in the Blakeney Neighbourhood Plan.</p> <p>Comment noted.</p> <p>Comments noted. With so many 'made' Neighbourhood Plans with many containing policies that are 'similar' it is not surprising that the fundamentals of the policies are "copied" - why reinvent the wheel when this policy has been deemed to meet the Basic Conditions and has already passed its examination.</p>

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		<p>Inspector was minded to accept the soundness of the policy in the NP. It is clear that the policy in the Plan is not underpinned by relevant and up-to-date, locally derived, evidence.</p> <p><u>Evidential basis of Policy 3</u></p> <p>163. There appears to be no evidence presented in the Plan as to what the actual issue facing Blakeney that requires the introduction of this policy - other than a single statement regarding affordability. This statement at 6.71 is not compelling evidence, it is merely one particular statistic that has been extrapolated to make a spurious correlation between the number of holiday units and the affordability and supply of homes in Blakeney. For reasons stated previously, the issue around house prices and supply in Blakeney is complex and there is no clear justification or evidence to explain what influence holiday accommodation has on the local market and affordability.</p> <p>164. Most of the justification at 6.84 to 6.86 has been copied from the North Northumberland Coast Plan. As previously stated, North Northumberland produced a 'Housing Evidence Paper' to support the inclusion of such policies and it is not appropriate to copy sections of 'justification' from one plan to another without having a similar significant evidence base to support it.</p>	<p>Policy 3 of the Blakeney Neighbourhood Plan has the same policy intent, therefore, similar wording to the North Northumberland Coast Neighbourhood Plan Policy 16. The issues being faced by the three parishes, which make up the area known as North Northumberland Coast, are not dissimilar to those being faced by the community of Blakeney.</p> <p>Policy 3 of the Blakeney Neighbourhood Plan is underpinned by relevant, proportionate Blakeney based evidence.</p> <p>Comment noted. The sustainability of Blakeney is raised throughout the Blakeney Neighbourhood Plan and Policy 3 (along with Policies 2 and 4) form a suite of policies that each tackle a specific issue and as a whole will make a difference in Blakeney having a sustainable community.</p> <p>With just under 18% of the housing stock in Blakeney registered as holiday accommodation this is a serious issue.</p> <p>Comments noted. Paragraphs 6.84 to 6.86 of the Blakeney Neighbourhood Plan relate to Policy 4, rather than Policy 3 of the Blakeney Neighbourhood</p>

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		<p>165. The Plan has not provided or considered any balanced evidence on the economic impact of tourism and overnight stays on the Blakeney economy.</p> <p style="text-align: center;"><u>Clarity and effectiveness of Policy 3</u></p> <p>166. The policy implies a level of control that cannot be imposed and as such is misleading to the public. The application of proposed Policy 3 is likely to be considerably limited, if it is able to be implemented and apply at all. This has been explained to the Steering Group and the consultant on a number of occasions. As acknowledged in the 'evidence and justification' section for this policy, in the majority of cases a change of use from residential to holiday accommodation does not require planning permission.</p> <p>The explanation previously sent to the Steering Group on the 'Moore' case fully detailed the issues.</p>	<p>Plan. The 'Housing Evidence Paper' covers similar information and topics which are also contained within Blakeney Baseline Data Report. Both documents cover – housing and planning context, population profiles, economic activities, housing stock profiles and tenures, market analysis and housing pricing comparisons, second homes, holiday accommodation and housing needs. The evidence base is considerable – far more than that required to be seen to be 'proportionate' – and very comprehensive to support the Blakeney Neighbourhood Plan and this suite of policies (Policies 2, 3 and 4).</p> <p>Comment noted. However, this evidence is not necessary. Policy 3 of the Blakeney Neighbourhood Plan as this policy is seeking due consideration is taken to ensure there is a shortage of this type of accommodation - rather than oversupplying and reducing the residential housing – and where a need is deemed and demonstrated that in granting such usage does not generate significant impacts in terms of pollution or traffic.</p> <p>Comment noted. Paragraph 6.71 sets out the context, identifying 127 dwellings (just under 18% of the housing stock in Blakeney) as registered holiday accommodation. On the latest figures provided by NNDC this figure has reduced to 125 (see comment 139 above). Paragraphs 6.72 to 6.77 explain when and how planning permission may or may not be needed (one of the 'grey' areas of planning).</p>

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		<p>167. An analysis on the Council's planning database suggests that there have only been 3 applications for change of use from residential to holiday accommodation in the past 20 years in Blakeney. There have been no applications for change of use from Residential to Sui Generis. The Plan is proposing a policy that will have very little impact in land use planning terms. This is not appropriate or proportionate.</p> <p>168. Points 1 & 2 in the policy is already being applied through existing Core Strategy policies. This policy does not add anything that would not be currently applied through EN 4: Design or CT 5: The Transport Impact of New Development or CT 6: Parking Provision (including the Parking Standards at Appendix 3).</p>	<p>Comment noted. The relevance of the Moore case was discussed in the meeting held on 25th March 2019, see previous comment above at (21), were it was pointed out that while the case - Sheila Moore v Secretary of State for Communities and Local Government, Suffolk Coastal District Council, Case No: CI/2012/0873 – set current case law on the positioning and requirement of 'change of use' the relevance for the Blakeney Neighbourhood Plan (and NNDC in applying the policies) was not whether a change of use was required or not. Instead, the Blakeney Neighbourhood Plan, once made, would require Policy 3 to be taken into account when NNDC, as the Local Planning Authority, received application for the change of use to holiday accommodation.</p> <p>Comment noted. However, none of the criteria in Policy 3 of the Blakeney Neighbourhood Plan are specific policy requirements of the Core Strategy.</p> <p>Core Strategy Policy EN 4 Design does not specifically mention noise pollution.</p> <p>Core Strategy Policy CT 5 The Transport Impact of New Development relates to new development – not existing development – it also relates the impact to highway safety rather than impact on residents.</p> <p>Core Strategy Policy CT 6 Parking Provision, Appendix C sets the levels expected for homes - although does</p>

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		<p>169. It is not clear what 'new purpose-built holiday accommodation' has to do with this policy? It is a separate matter and if it has been highlighted by the evidence as being an important issue then it probably should have its own policy.</p> <p><u>Conclusions</u></p> <p>170. No evidence has been provided as to the impact that any proposals have had on Blakeney. It appears that the Steering Group are adamant on including this policy as they are 'being seen to be doing something' irrespective of the evidence or no matter how ineffectual the policy may be.</p> <p>171. This policy does not contribute, in a meaningful way, to delivering sustainable development. Furthermore, when also taking into account the lack of a robust and locally derived evidence base this policy has not had regard to national policies and advice contained in guidance issued by the Secretary of State. Therefore this policy does not meet the Basic Conditions tests.</p>	<p>not specify the parking is to be required within the curtilage of the property – it does not specify the requirement for holiday accommodation under sui generis usage.</p> <p>Core Strategy Policy EC 2 The Re-use of Buildings in the Countryside does require that “..... must be appropriate in scale and nature to the location.” But this policy only applies to the re-use of buildings in the countryside.</p> <p>Comment noted. The word 'new' is not needed and will be removed from the policy.</p> <p>Comment noted. Policy 3 of the Blakeney Neighbourhood Plan will be effective and it is wrong of NNDC to make a statement to the contra. Policy 3 of the Blakeney Neighbourhood Plan will address this particular element of change of use as and when planning permission is sought.</p> <p>Comments noted. However, policies in any Plan must contribute to delivering sustainable development, there is no measurement of “meaningful”. Whilst it is recognised, in paragraph 6.75 of the Blakeney Neighbourhood Plan, that the likelihood of Policy 3 being used is relatively low Policy 3 still does contribute to sustainable development. The</p>

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	Policy 4	<p>Recommendation</p> <p>172. Policy 3 should be removed from the Plan.</p> <p>Policy 4: Change of use of Holiday Accommodation to residential</p> <p>173. The purpose of this policy is to control the change of use from holiday accommodation to residential dwellings.</p> <p>174. The stated 'Ambition' in the Plan is: <i>Change of use from Holiday Accommodation to Residential - seeking to ensure any usage change increases the number of principal homes.</i></p> <p>175. This is another policy that appears to have been copied from the North Northumberland Coast Plan. The Blakeney Plan must to be informed by appropriate and proportionate evidence that is locally derived in relation to the issue that the policy is intending to influence and should be justified based on the specific local circumstances. As previously stated in relation to Policies 2 & 3, it may be tempting to take a policy out of a 'Made' local plan and transpose it into the Plan, however, without the supporting evidence base it is not appropriate.</p>	<p>Blakeney Baseline Data document contains extensive evidence relating to Blakeney. As outlined above (166) Policy 3 does not seek to define how or when a change of use is required – that will be down to NNDC. Therefore, Policy 3 of the Blakeney Neighbourhood Plan does meet the Basic Conditions and more details of specifically how can be found in the Basic Conditions Report the supports the Blakeney Neighbourhood Plan.</p> <p>Comment noted. Policy 3 of the Blakeney Neighbourhood Plan will remain.</p> <p>Comment noted. However, the NNDC statement is incorrect. The purpose of Policy 4 is clearly defined in the ambition statement in paragraph 6.83 as “seeking to ensure any usage change increases the number of principal homes.”</p> <p>Comments noted. With so many 'made' Neighbourhood Plans with many containing policies that are 'similar' it is not surprising that the fundamentals of the policies are “copied” - why reinvent the wheel when this policy has been deemed to meet the Basic Conditions and has already passed its examination.</p>

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		<p style="text-align: center;">Evidential basis of Policy 4</p> <p>176. The evidence presented is lacking depth and explanation and it is not clear that there is a direct correlation between the information presented and the policy. As with Policy 3 little or no evidence has been presented to suggest that there is a need for the introduction of this policy beyond the statement that its intention is to “boost the supply of homes occupied as a Principle Residence”.</p> <p>177. An initial trawl of our records suggests that there has been 1 change of use application from holiday to residential in the past 20 years and there may only be around 5 properties in Blakeney which may have a holiday use restriction. This is an extremely, limited selection of properties that might be affected by such a policy (if it applies at all – see below).</p> <p style="text-align: center;">Clarity and effectiveness of Policy 4</p> <p>178. The policy implies a level of control that cannot be imposed and as such is misleading to the public. The application of proposed Policy 4 is likely to be considerably</p>	<p>Policy 4 of the Blakeney Neighbourhood Plan has the same policy intent, therefore, similar wording to the North Northumberland Coast Neighbourhood Plan Policy 17. The issues being faced by the three parishes, which make up the area known as North Northumberland Coast, are not dissimilar to those being faced by the community of Blakeney.</p> <p>Policy 4 of the Blakeney Neighbourhood Plan is underpinned by relevant, proportionate Blakeney based evidence both with the Blakeney Neighbourhood Plan and Blakeney Baseline Data document.</p> <p>Comment noted. However, in the original data from NNDC there were 127 registered dwellings as holiday accommodation, which indicates there is a sizable element (18%) of the potential housing stock registered as holiday businesses. Looking at the new data provide by NNDC, see table at in earlier comment above at (139), would indicate that the number of holiday homes has reduced by two between 2018 and 2019, now stands at 125 dwellings. This indicates that there would have been potentially two homes that Policy 4 of the Blakeney Neighbourhood Plan would, if the Blakeney Neighbourhood Plan had been ‘made’ would now have the Principal Residence condition.</p>

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		<p>limited, if it is able to be implemented and apply at all. Planning permission is generally not required for change of use from holiday accommodation to residential in most circumstances. This has been explained to the Steering Group and the consultant on a number of occasions.</p> <p>179. Does such an application for a narrow change of use actually need to be controlled with a 'Principle Residence Restriction', especially as a change from holiday accommodation to residential dwelling would have a positive effect on the housing stock?</p> <p>This policy would, in those rare circumstances where permission is required, prove to be a serious disincentive.</p> <p>180. The same issues that are highlighted in the justification of Policy 2 (in relation to Principle Residences) apply to this policy. The evidence, as presented does simply not make the case.</p> <p>181. The final sentence is poorly written and could be considered to conflict with the purpose of the policy text above.</p> <p>Conclusions</p>	<p>Comment noted. The latest data provided by NNDC lists 125 registered holiday accommodation – paying business rates rather than Council Tax – should any of these properties be brought back to residential (C3) usage then once the Blakeney Neighbourhood Plan is 'made' Policy 4 will require it is used as a principal residence, as per earlier response above (177).</p> <p>Comment noted. To meet the ambition of increasing the number of principle residencies in Blakeney, yes there is an identified need, as per the evidence kindly provided by NNDC. Indeed, creating the housing stock and making them homes that, as principle residences, were occupied and us.</p> <p>Comment noted. This would be a consideration that any owner of a registered holiday accommodation would take into account when making the choice of continuing to pay business rates (good for the local economy) or pay Council Tax (contributing to local services).</p> <p>Comments noted. The evidence both the Blakeney Neighbourhood Plan and Blakeney Baseline Date document is proportionate and appropriate.</p> <p>Comment noted. Policy wording will be amended.</p>

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		<p>182. Again, it appears that the Steering Group are adamant on including this policy as they are 'being seen to be doing something' no matter how ineffectual.</p> <p>183. No evidence has been provided as to the impact that such development has had on Blakeney. No evidence has been produced to support the introduction of such a policy and the effects that such would have.</p> <p>184. This policy does not contribute, in a meaningful way, to delivering sustainable development. Furthermore, when also taking into account the lack of a robust and locally derived evidence base this policy has not had regard to national policies and advice contained in guidance issued by the Secretary of State. Therefore this policy does not meet the Basic Conditions tests.</p> <p>Recommendation</p> <p>185. Policy 4 should be removed from the Plan</p> <p>Policy 5: Extensions to Holiday Accommodation</p>	<p>Comment noted. This was discussed at length in the meeting in March 2019 and workshop in July 2019.</p> <p>Comments noted. The evidence both the Blakeney Neighbourhood Plan and Blakeney Baseline Data document is proportionate and appropriate.</p> <p>Comments noted. However, the Examiner of the North Northumberland Coastal Blakeney Neighbourhood Plan may take a very different view to NNDC. Policy 4 does contribute to sustainable development. Policies in any Plan must contribute to delivering sustainable development and there is no measurement of "meaningful".</p> <p>The Blakeney Baseline Data document contains extensive evidence relating to Blakeney. Therefore, Policy 4 of the Blakeney Neighbourhood Plan does meet the Basic Conditions and more details of specifically how can be found in the Basic Conditions Report the supports the Blakeney Neighbourhood Plan.</p> <p>Comment noted. Policy 4 of the Blakeney Neighbourhood Plan will remain.</p>

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	Policy 5	<p>186. The stated 'Ambition' in the Plan is: <i>Extensions to Holiday Accommodation – seeking to reduce the impact any extension to holiday accommodation has on residents.</i></p> <p>187. This is another policy that appears to have been copied from the North Northumberland Coast Plan. The Plan must to be informed by appropriate and proportionate evidence that is locally derived in relation to the issue that the policy is intending to influence and should be justified based on the specific local circumstances. As stated above, it may be tempting to take a policy out of a 'Made' local plan and transpose it into the Plan, however, without the supporting evidence base it is not appropriate.</p> <p><u>Evidential basis of Policy 5</u></p> <p>188. 6.91 attempts to provide the context for the policy, however, the statement it is not backed up with any evidential basis. Furthermore, this justification text has been taken, almost verbatim from the North Northumberland Coast Plan and it must be questioned how the Plan can justify the requirement for the policy in Blakeney.</p>	<p>Comments noted. The North Northumberland Coast Neighbourhood Plan Policy 18 provides the scope to be positive about enabling owners to develop their businesses while also being mindful for the possible impacts and ensure they are considered. Therefore, why reinvent the wheel when this policy has been deemed to meet the Basic Conditions and has already passed its examination.</p> <p>Comments noted. We would have expected NNDC to back the residents of Blakeney and support the small steps to preserve local amenity for them.</p> <p>The three criteria of Policy 5 of the Blakeney Neighbourhood Plan are not seen as being excessive and precisely outlines the requirement relating the development proposals for holiday let accommodation. Policy 5 seeks to shape and direct sustainable development to ensure that local</p>

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		<p>As previously stated, North Northumberland Coast produced a 'Housing Evidence Paper' to support the inclusion of such policies and it is not appropriate to copy sections of 'justification' from one plan to another without having a similarly robust evidence base to support it.</p> <p><u>Clarity and effectiveness of Policy 5</u></p> <p>189. The policy implies a level of control that cannot be imposed and as such is misleading to the public. The application of proposed Policy 5 is likely to be limited, if it is able to be implemented and apply at all. Extensions to holiday accommodation are generally allowed through Permitted Development rights (unless the dwelling forms part of the small percentage of holiday accommodation that is sui generis or has an occupancy restriction condition).</p> <p>190. There is an inconsistency in the 'justification' text and the wording of the policy. At 6.90 the text suggest that the policy would only apply to sui generis use, however, this is not reflected in the policy text.</p> <p>191. What is meant by sufficient outdoor amenity space for holiday occupants? Some holiday apartments and units may not have</p>	<p>people get the right type of development for their community.</p> <p>Comment noted. The evidence provided in the 'Housing Evidence Paper' – page 22, the number of registered holiday accommodation – is matched by the evidence provided in the Blakeney Neighbourhood Plan and Blakeney Baseline Data document. Table I in the Blakeney Neighbourhood Plan identifies that in 2018 there was 127 registered properties and the updated data NNDC has provided as part of their comments, see (139) above, illustrates for 2019 there has been a decrease of two with the total registered properties now 125.</p> <p>Comments noted. This statement by NNDC is incorrect. With 125 registered properties falling with scope of Policy 5 of the Blakeney Neighbourhood Plan it demonstrates the scale of application.</p> <p>Comment noted. The wording of the text will be updated to align with the wording in Policy 5.</p>

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		<p>any outdoor space at all and would be considered sufficient in the context of the type of holiday accommodation provided.</p> <p>192. Bullet 2 may be considered unreasonable. Application of the policy in relation to car parking could be seen as unreasonable in the historic heart of Blakeney, where many properties do not have off street car parking. Holiday cottages are often occupied by a family group often arriving in more than one car – how can this policy be enforced? Parking is provided free of charge off site and weekly passes available - the policy simply cannot be applied.</p> <p>193. here is an inconsistency in language: holiday accommodation in the title and holiday lets in the body. Presumably, this policy only applies to holiday accommodation that is formally let?</p> <p><u>Conclusions</u></p> <p>194. There is little to be gained from including a policy that will be ineffectual. Remember plans need to be aspirational but realistic. It would be better to explain in the Plan the difficulties of adopting such an approach rather than include a policy for the sake of it.</p> <p>195. No evidence has been provided as to the impact that such development has had</p>	<p>Comment noted. This aligns with NNDC's own amenity space requirements, based on size of property, while still giving enough scope to not be over prescriptive.</p> <p>Comment noted. However, this is appropriate and will expect</p> <p>The NNDC comment highlights exactly the historical problem that existing Development Plan policies have permitted - multiple cars without due consideration given to parking – the availability of off-site parking is very limited and unlikely to satisfy any increase in demand. Therefore, it is appropriate that this simple criteria is applied to future proposals for holiday accommodation.</p> <p>Comments noted. The title of Policy 5 of the Blakeney Neighbourhood Plan will be updated.</p> <p>Comment noted, however, the NNDC comment is incorrect – a fact supported by this type of policy being included within other 'made' Neighbourhood Plans – It is very disingenuous of NNDC to the time and effort that the local community has put into producing the Blakeney Neighbourhood Plan to say anything has been none "for the sake of it". This reflects a very poor choice of words by NNDC.</p>

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	Policies 6, 7, 8 and 9	<p>on Blakeney. No evidence has been produced to support the introduction of such a policy and the effects that such would have.</p> <p>196. This policy does not contribute, in a meaningful way, to delivering sustainable development. Furthermore, when also taking into account the lack of a robust and locally derived evidence base this policy has not had regard to national policies and advice contained in guidance issued by the Secretary of State. Therefore this policy does not meet the Basic Conditions tests.</p> <p><u>Recommendation</u></p> <p>197. Policy 5 should be removed from the Plan.</p> <p>Design Policies</p> <p>198. The design related policies (6, 7, 8 & 9) are repetitious, confusing with potential conflicts between them. A single design policy should be produced that covers the issues that need to be addressed taking into account the evidential basis and community aspirations.</p>	<p>Comment noted. The outcome is clear, and to quote the Examiner of the North Northumberland Coast Neighbourhood Plan in relation to Policy 18 (paragraph 214) "The policy seeks to shape and direct sustainable development to ensure that local people get the right type of development for their community. this policy meets the Basic Conditions."</p> <p>Policy 5 does contribute to sustainable development. The Blakeney Baseline Data document contains extensive evidence relating specifically to Blakeney. This type of policy is included in many 'made' Neighbourhood Plans and deemed to meet the Basic Conditions tests.</p> <p>Comment noted. Policy 5 of the Blakeney Neighbourhood Plan will remain.</p> <p>Comment noted. The four design related policies in the Blakeney Neighbourhood Plan are positioned, as drafted, to make it easier to for developers to understand the requirements.</p> <ul style="list-style-type: none"> • Policy 6 focuses on the general principles of development design,

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		<p>199. Much of the 'heritage' and conservation related information is located under the 'Natural Environment' section and should be moved to form part of the justification of the design policies.</p> <p>200. The Plan should consider, and take fully into account, the Governments recently published design guidance. The National Design Guide sets out the characteristics of well-designed places and demonstrates what good design means in practice. This guide forms part of the government's collection of planning practice guidance and should be read alongside the separate planning practice guidance on design process and tools.</p> <p>201. The Plan does not present a comprehensive appraisal of the existing suite of design and conservation related policy and guidance documents, including Section 12 of the NPPF, Core Strategy Policies EN 4, EN 5 & EN 8, The North Norfolk Design Guide and</p>	<ul style="list-style-type: none"> • Policy 7 is specifically focused on improving the design of homes and their impact, • Policy 8 has its focus on infill and seeks to improve proposals that come forward in the future, and • Policy 9 deals specifically with the knotty problem of replacing existing dwellings. <p>To combine these policies would add confusion and make a single policy unwieldy.</p> <p>Comment noted. As suggested the heritage section will be moved from Natural Environment to Built Environment.</p> <p>Comment noted. Details of the National Design Guide will be added to the supporting text, the list of supporting documents and Appendix 2.</p> <p>Comments noted. There is no requirement with the Blakeney Neighbourhood Plan to provide a "comprehensive appraisal". An assessment of the</p>

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	Policy 6	<p>the July 2019 Blakeney Conservation Area Appraisal and Management Plan.</p> <p>An assessment of the existing policy and guidance would have clearly identified where there are gaps (taking into account local evidence) and inform locally derived specific policies to add local distinctiveness.</p> <p>202. Given the existing detailed policy and guidance on design, including the comprehensive and specific guidance for Blakeney in the 2019 Conservation Area Appraisal and Management Plan, the Plan has not presented a clear rationale for a great deal of the content of policies 6 to 9.</p> <p>Policy 6: Design of New Development</p> <p>203. The stated 'Ambition' in the Plan is: <i>Design of New Development – seeking through good design principles to facilitate high quality and well-designed development. It is particularly concerned with ensuring the infrastructure of multiple or single new developments meets high standards.</i></p>	<p>existing National Planning Policy Framework and Development Plan policies will be presented in the Basic Conditions Report, which will be one of the supporting documents to accompany the Examination version of the draft Blakeney Neighbourhood Plan.</p> <p>Section 5 of the Blakeney Neighbourhood Plan introduces and sets the context of the National Planning Policy Framework and Development Plan policies. Paragraph 6.199 introduces the Blakeney Conservation Area Appraisal and Management Plan.</p> <p>Comment noted. The existing policies have been used as a starting point to inform the Blakeney Neighbourhood Plan and develop the policies in the Blakeney Neighbourhood Plan at a neighbourhood level – rather than a district or national level.</p> <p>Comment noted. However, NNDC should note that paragraphs 6.95 to 6.152 of the Blakeney Neighbourhood Plan present the ambition, need, rationale and context for Policies 6, 7, 8 and 9 in the Blakeney Neighbourhood Plan.</p>

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		<p>204. It is not clear why is the policy thought to be necessary and what the Plan is trying to achieve that is not already in the existing policy and guidance. The comments below relate to the 4 'design' related policies: 6, 7, 8 & 9.</p> <p>No reference is made to the North Norfolk Design Guide which will cover many of the principles set out in this policy and is a key document in this policy.</p> <p>205. Within the sections referring to landscape proposals, reference should be made to the requirement for a 10% net gain in biodiversity resulting from all development which is set out in the Government's draft Environment Bill (Policy Statement July 2019).</p> <p><u>Evidential basis for Policy 6</u></p> <p>206. The approach in relation to Design adds nothing to the existing policy base and is a lost opportunity to specify the local distinctiveness and character that the Plan would want developers to take account of and define the necessary characteristics that</p>	<p>Comment noted. The four design policies in the Blakeney Neighbourhood Plan are necessary to apply specific criteria and requirements at a lower level of detail (neighbourhood level), something the existing policies are unable to do.</p> <p>Comment noted. Reference is made to the North Norfolk Design Guide (SPD) in paragraphs 6.132 and 6.152. It is also referenced in Appendix 2. Additional supporting text will be added to specifically cover the North Norfolk Design Guide.</p> <p>Comment noted. Policy 11 of the Blakeney Neighbourhood Plan sets the requirement of development to improve biodiversity. Whilst, NNDC will be aware that the level of gain suggested (10%) is not yet government policy. Also, the proposal as drafted - "... will require developers to ensure habitats for wildlife are enhanced, with a 10% increase in habitat value for wildlife compared with the pre-development baseline." - relates only to habitat, which only one area of biodiversity.</p> <p>Reference to the draft Environment Bill (Policy Statement July 2019) will be added to the supporting text in section 6.213 Biodiversity as part of the context.</p> <p>Comments noted. The requirements and criteria set out in the design policies of the Blakeney Neighbourhood Plan are the elements identified that</p>

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		<p>the existing strategic approach calls for. Much of the policy approach repeats the design elements in existing policies and is a lost opportunity for the neighbourhood plan and unnecessary. Much of the comments below have previously been highlighted to the steering group and consultant previously.</p> <p>207. There is little in the way of evidence in relation to Blakeney's architectural or building heritage. The Conservation Area Appraisal is not mentioned and there is not a clear explanation of how design has influenced the place setting of Blakeney. There are a number of areas of widely different character ranging from the historic heart to the post war and modern development.</p> <p>It is not realistic for a development that is some way from the Conservation Area to be expected to preserve or enhance the character of the CA.</p> <p>208. The evidence/policy approach does not really address:</p> <ul style="list-style-type: none"> o What creates a strong sense of place with regard materials in Blakeney – this should be specific and clear. 	<p>are important through the local community engagement and where existing policy is deficient in its delivery, The Blakeney Neighbourhood Plan is able to take policy requirement to a neighbourhood level and recognises that this is something NNDC cannot do with its generic policies that are required to apply across the District. Despite explaining this to NNDC Officers in the meeting on 25th March and subsequent workshop on 5th July 2019.</p> <p>Comment noted. Paragraphs 6.197 to 6.208 presents the Blakeney Conservation Area Appraisal and these paragraphs will be moved to the supporting text in the Built Environment section. See earlier comment (199) and response.</p> <p>Comment noted. Given the size of the Blakeney Conservation Area relative to the remaining areas of the village it is appropriate that all development in Blakeney is mindful to any impact it may have on the Conservation Area. As ever with planning there is an expectation of relevance and proportionate. Therefore, the degree of application should be appropriate to the proximity of the development proposals to the Conservation Area.</p> <p>Comments noted.</p> <p>Contained with the Blakeney Conservation Area Appraisal and Management Plan and North Norfolk</p>

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		<ul style="list-style-type: none"> ○ Heritage assets are covered in the Core Strategy and in the NPPF and the policy approach does not add anything further to Core Strategy or NPPF. ○ Parameters of massing etc., are covered in the Core Strategy and are detailed in the NNDC Design Guide – what is meant by unacceptable in the Blakeney context? ○ Highway safety is the remit of the highway authority and will be considered by them – at best this is an aspiration. ○ What is meant by mitigate visual impact of the development? Landscape impact is covered in the Core Strategy and emerging Local Plan. Tree retention, hedgerows and landscaping are all covered in the LP and Design Guide. Is the character of Blakeney dependent on existing tree coverage? ○ Reference to a 3rd Party checklist should not be incorporated into 	<p>Landscape Character Assessment with no need to duplicate in the Blakeney Neighbourhood Plan.</p> <p>The Core Strategy Policy EN 8 only seeks to protect designated heritage assets, whilst Policy 6 of the Blakeney Neighbourhood Plan also seeks to protect non-designated heritage assets.</p> <p>Policy 6 of the Blakeney Neighbourhood Plan is clear in criteria (5) be defining as “..... does not result in an unacceptable loss of light or overshadowing, or other adverse amenity impacts on other properties;”</p> <p>Comment noted. Criteria (6) of Policy 6 of the Blakeney Neighbourhood Plan guides the Highway Authority in specific areas that are important to the community of Blakeney. In determining planning proposals and making the decision, it is the remit of the Local Planning Authority (NNDC) to satisfy itself that designs are safe, albeit, based on the advice of the Highways Authority. This is policy, as detailed in Criteria (6) of Policy 6 of the Blakeney Neighbourhood Plan - not an aspiration.</p> <p>Comment noted. The retention of existing trees and hedgerows is important both as an amenity but more importantly for the biodiversity impact of existing habitats. It is welcomed that the emerging Local Plan now seeks to retain trees and hedgerows. It is a good design principle to use landscape plans to soften the impact of new development.</p>

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		<p>policy. National policy can only implement the nationally described technical standards. These can only be evoked through a Local Plan. You may express support for the use of a check sheets but it will not be possible to require its use.</p> <ul style="list-style-type: none"> ○ Secure by design is requirement of the policy. It is not clear how the Plan expects that new homes will introduce measures to enhance the safety and security of village. <p>If the development has a neutral effect on the wider 'security' of the village – should it be turned down?</p> <ul style="list-style-type: none"> ○ Outdoor lighting does not require planning permission as such the policy implies a level of control that cannot be imposed and is misleading. <p>209. It is not clear why the Plan has introduced the issue around connections to the public sewerage system. The Plan does not present any evidence on this matter and relies on a statement (at 6.127) that there has been a problem elsewhere in Norfolk. There is no evidence of a problem in Blakeney and this is supported by the information from</p>	<p>Comment noted. Dementia is, sadly, likely to become a critical issue for sustainable communities in the future. Incorporating simple and effective design choices (that will enable residents to remain in their homes longer) based on recognised best practice should be welcomed by all. Other 'made' Neighbourhood Plans already have this as policy requirement. It should be noted the wording "where possible".</p> <p>Comments noted. However, NNDC is misleading in the comment made – Criteria (10) of Policy 6 of the Blakeney Neighbourhood Plan requires "..... the safety and security of residents of Blakeney and incorporate crime prevention principles...."</p> <p>Again, misleading question by NNDC who are misquoting the Policy 6 of the Blakeney Neighbourhood Plan. The policy requirement of criteria 10 is to "... incorporate crime prevention principles with the design" How effective those best practice principles turn out to be can only be measured once a development is built.</p> <p>Comment noted. Although, pollution (including light pollution) is a requirement of planning permission.</p> <p>Comment note. One particular developer – Persimmon Homes – has had this issue on two of their developments. This is a wider issue causing much concern in many areas where there is limitations on sewerage capacity. Therefore, more and more</p>

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	Policy 7	<p>Anglian Water in their consultation responses to the proposed site in Blakeney. This 'issue' and policy line appears to be copied from the Aylsham Plan where it did appear there was evidence that connections to the sewage system was a local issue.</p> <p>Policy 7: Improving Design of New and Replacement Homes</p> <p>The stated 'Ambition' in the Plan is: Improving Design of New or Replacement Homes - this policy seeks to ensure new homes are designed to a high standard.</p> <p>210. See overarching comments, above, in relation to shortfalls of the suite of 'design policies'.</p> <p>211. This policy appears to duplicate elements of Policies 8 & 9 in relation to density, scale, height, etc. and is similarly a duplication of existing Core Strategy policy, NPPF and Building Regs. Extensions to dwellings may be Permitted Development in many cases.</p>	<p>'made' Neighbourhood Plans now include this criteria. There is no reason for residents, both current and future, to experience this type of problem and adding it as a policy requirement seeks to ensure this sort of unwanted issue is not seen in the Blakeney Neighbourhood Area – it is better to prevent than to try to cure – and would suggest NNDC include something similar in the emerging Local Plan to cover the entire District.</p> <p>Comments noted. The Blakeney Neighbourhood Plan details the ambition, need, rationale and context for Policies 6, 7, 8 and 9 in the Blakeney Neighbourhood Plan (paragraphs 6.95 to 6.152). The design related policies in the Blakeney Neighbourhood Plan are positioned positively to enable development that is sustainable, either by being complementary to the Core Strategy policies by applying at a 'lower level' in more detail or covering an area where the Core Strategy policies are silent.</p> <p>Comment noted. There is no duplication. Neither Policy 8 or Policy 9 of the Blakeney Neighbourhood Plan mention "density, scale, height, etc...". The earlier NNDC feedback and from the meeting of 25th March 2019, while these policies were still in</p>

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	Policy 8	<p style="text-align: center;">Policy 8: Infill Development</p> <p>212. The stated 'Ambition' in the Plan is: <i>Infill Development – seeking to ensure infill development is appropriate in terms of the size and character of new homes and will complement the existing development.</i></p> <p>213. <i>See overarching comments, above, in relation to shortfalls of the suite of 'design policies'.</i></p> <p>214. It would be helpful if the plan could have provided evidence or examples where there has been recent developments that are considered overdevelopment or have affected the character.</p> <p>There is a picture of a site at 'The Chase' which is described as being 'High density replacement homes' – but no explanation as to why such development is an issue or what impact it has on Blakeney.</p>	<p>development NNDC helpfully helpful pointed out the duplication and both Policies 8 and 9 were reworded with NNDC assistance at the subsequent workshop on 5th July 2019 and finalised for the Pre-Submission version of the Blakeney Neighbourhood Plan. Permitted development rights were also discussed at the workshop relating to infill and replacement dwellings. By removing permitted development rights does not stop further development, instead it ensures that additional development in these instances is appropriate, is assessed openly through the planning application process and aids sustainable development.</p> <p>Comment noted. Please see earlier above response at comment (210).</p> <p>Comment noted and the names of recent development at Stratton Long Marine, Westgate Street and Michaelmas, Langham Road will be added.</p> <p>Comment noted. Clear needs to be taken when identifying specific homes with possible issues – as these are owned by local residents who have made the choice to purchase these homes knowing of the</p>

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	Policy 9	<p>215. The removal of permitted development rights cannot be applied in a blanket fashion as suggested in the policy. A view will be made on each proposal as to whether there are individual circumstances which suggest permitted development rights should be withdrawn. The policy and supporting text needs to add wording in order to guide officers as the circumstances where permitted development rights could be withdrawn. e.g. further development may have an undesirable effect on amenity (which will need to be established in a case by case basis).</p> <p>216. What is a 'redevelopment site'? Is it a brownfield site or is it a replacement home site? If it is brownfield – the Plan should say so and be mindful of the up-to-date guidance on the matter including issues such as 'permission in principle'.</p> <p>Policy 9: Existing Dwelling Replacement</p> <p>217. The stated 'Ambition' in the Plan is: Existing Dwelling Replacement – seeking to counteract overdevelopment and negative impact on existing residents.</p> <p>218. See overarching comments, above, in relation to shortfalls of the suite of 'design</p>	<p>situation. The use of this picture highlights where overdevelopment has resulted in high density relative to the area which means there is no on-site green space.</p> <p>Comment noted. Policy 8 of the Blakeney Neighbourhood Plan is being misrepresented. Please see earlier response above at comment (211). The removal of permitted development rights is only for infill development to ensure any further development on the site has due scrutiny. Restricting permitted development rights is appropriate for Blakeney, as large parts of the village are within the Conservation Area and all of Blakeney is in an Area of Outstanding Natural Beauty (AONB).</p> <p>It was considered Could add "where appropriate permitted development rights will be removed" any thoughts?</p> <p>Comment noted. The word 'brownfield' will be inserted into Policy 8 of the Blakeney Neighbourhood Plan. Permission in principle (PIP) – the establishment that a site is suitable for residential development – can still be applied as an alternative way of obtaining planning permission, with the technical detail of the development following at a later stage.</p> <p>Comment noted. Ambition will be reworded to a positive statement and sustainable development.</p>

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		<p>policies'. Again, appears to be a great deal of duplication between this policy and the other 'design' policies in the plan.</p> <p>219. The removal of permitted development rights cannot be applied in a blanket fashion as suggested in the policy. A view will be made on each proposal as to whether there are individual circumstances which suggest permitted development rights should be withdrawn.</p> <p>220. The policy references increase in height, but does not reference any increase in area.</p>	<p>Comment noted. There is no duplication. There is concern that NNDC are still referencing the earlier draft version of Policy 9 of the Blakeney Neighbourhood Plan, prior to Policy 9 being finalised with help from NNDC at the workshop on the 5th July.</p> <p>Comment noted. This is incorrect, there are many examples of where under Article 4 of the Town and Country Planning (General Permitted Development) Order 1995 (the GPDO) permitted development rights have been restricted or withdrawn.</p> <p>An Article 4 direction is made by the local planning authority. It restricts the scope of permitted development rights either in relation to a particular area or site, or a particular type of development anywhere in the authority's area. This action might be because the character of an area is of acknowledged importance (such as a conservation area) and would be threatened by unrestricted works.</p> <p>Withdrawing permitted development rights for infill development and replacement dwellings is appropriate for Blakeney with its designated areas, as large parts of the village are within the Conservation Area and all of Blakeney is in an Area of Outstanding Natural Beauty (AONB).</p> <p>Comment noted, this is correct as NNDC know from the workshop on 5th July 2019, where there was much discussion relating to limiting the increase in size – with many percentages being suggested – although agreement could not be reached on</p>

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		<p>Would an existing dwelling replacement also be considered 'infill' under Policy 8?</p> <p>Application of this policy could see a potential for 'over development' of a site which is not in line with the Plans ambitions.</p> <p>Conclusions in relation to the 'Design' Policies (6, 7, 8 & 9)</p> <p>221. If the Plan's aim is to influence design or it is a concern, then a single policy should be used to outline the detail and meaning of the key components of design that are identified as important in the context of the village and wider parish (the Plan doesn't distinguish between the two). Such an approach would include elements of all of the policies so as to avoid the repetition. It is better to have one solid meaningful and applicable policy than numerous conflicting policies.</p>	<p>setting a percentage and limiting development (this was seen as a negative and too restrictive).</p> <p>Comment noted. Possibility, it would depend whether it was inside (yes, Policy 8 of the Blakeney Neighbourhood Plan would apply) or outside (no, Policy 8 of the Blakeney Neighbourhood Plan would not apply) the existing settlement boundary. Where appropriate all policies in the Blakeney Neighbourhood Plan apply to all planning applications.</p> <p>Comment noted. NNDC have not explained under what circumstances they envisage 'over development' "could" occur. With the application of Policy 9 of the Blakeney Neighbourhood Plan and the other policies in the Blakeney Neighbourhood Plan there is less likely to be 'over development'.</p> <p>Comment noted. To combine these policies would make a single policy unwieldy and add confusion. The four design related policies in the Blakeney Neighbourhood Plan are positioned, as drafted, to make it easier to for developers to understand the requirements.</p> <ul style="list-style-type: none"> • Policy 6 focuses on the general principles of development design, • Policy 7 is specifically focused on improving the design of homes and their impact,

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		<p>222. The approach could detail the local context that should be reflected, specify materials that reflect the local texture of building, detail the form and layout that would be acceptable, include such things as how development should reflect the street frontage, etc.</p> <p>223. A background paper should be produced that reviews the existing policy requirements contained in the Core Strategy and Design Guide and also the new local plan and new design guide.</p> <p>Please note that the new Local Plan REQUIRES development to accord with it – i.e. Comply (with the Design Guide) or Justify (why an alternative approach is taken). This is a strategic approach that needs to be respected in the Plan. This is a change from the old policy which stated developers to have regard to the Design Guide and it is an</p>	<ul style="list-style-type: none"> • Policy 8 has its focus on infill and seeks to improve proposals that come forward in the future, and • Policy 9 deals specifically with the knotty problem of replacing existing dwellings. <p>These four policies include the elements that the local community identified as important through their involvement at the events and their feedback. All policies have been drafted to apply to all areas of the Blakeney Neighbourhood Area.</p> <p>Comment noted. To undertake what NNDC is suggesting would duplicate existing guidance. Policy 7, criteria 1 of the Blakeney Neighbourhood Plan identifies the need to “recognise and reinforce the distinctive local character features and building materials reflecting the village style.....” and references the Blakeney Conservation Area Appraisal and Management Plan as a guide.</p> <p>Comment noted. As per response above to comment (222) this would be a duplication. In the drafting of the Blakeney Neighbourhood Plan the existing policies of the Core Strategy have been considered.</p> <p>Comment noted. As NNDC know, the Basic Condition requirement is for the Blakeney Neighbourhood Plan to be in “general conformity” with the strategic policies contained in the Development Plan. This is a test that the Examiner will apply and the Basic Conditions Report that supports the Blakeney Neighbourhood Plan will detail the</p>

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		<p>attempt to increase the design quality of development in North Norfolk. There is therefore an opportunity through the Plan to identify specific design requirements over and above those conditioned in the strategic policy and new design guide as long as they are justified remain reasonable and does not place an onerous burden on developers.</p> <p>224. The following are words that encapsulate the local context and are design principles and the Plan should use the policy to define the relevant local meaning of each.</p> <ul style="list-style-type: none"> ○ Context ○ Urban structure ○ Density and mix ○ Building type ○ Details and materials ○ Urban grain – e.g. nature and extent of sub division ○ Height and massing ○ Façade and interface: the relationship with the street e.g. stepped back from road/ path, directly onto the street front gardens, include access to off street parking sufficient for the no of adults occupying ○ street scape and landscape – paths, connections, <p><u>Recommendations</u></p> <p>225. As currently evidenced, justified and presented Policy 6, Policy 7, Policy 8 and Policy 9 should be significantly reworked and</p>	<p>alignment to the Core Strategy. The emerging Local Plan is not and will not be policy for some considerable time, although the Blakeney Neighbourhood Plan will be 'mindful' for the draft policies contained in the emerging Local Plan – details of this will also be included in the Basic Conditions Report.</p> <p>Comments noted. These are all detailed in the Blakeney Conservation Area Appraisal and Management Plan and Policy 7, criteria 1 of the Blakeney Neighbourhood Plan references this document for use and guidance.</p> <p>Comment noted. Policies 6, 7, 8 and 9 have been drafted following input from NNDC, at the workshop</p>

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	Policy 10	<p>consolidated into a single effective design policy.</p> <p>Policy 10: Drainage and Flooding</p> <p>226. The stated 'Ambition' in the Plan is: <i>Drainage and Flooding – seeking to ensure new development does not cause flood related problems, especially associated with surface water run-off or sewerage.</i></p> <p>227. The chapter should draw attention to climate change mapping and all sources of flood risk and specifically include references to the SFRA mapping rather than the EA mapping.</p>	<p>on 5th July 2019, and cover the specific areas that have been identified as being important to the community of Blakeney and supporting sustainable development in Blakeney, being</p> <ul style="list-style-type: none"> • Policy 6 focuses on the general principles of development design, • Policy 7 is specifically focused on improving the design of homes and their impact, • Policy 8 has its focus on infill and seeks to improve proposals that come forward in the future, and • Policy 9 deals specifically with the knotty problem of replacing existing dwellings. <p>To combine these policies would add confusion and make a single policy unwieldy.</p> <p>Comments noted. Reference will be included in the supporting text.</p>

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		<p>228. The policy approach is unnecessary. If a flooding policy is required then the issue first has to be identified that is not already covered by existing policy then the policy should focus on address the local distinctive issue. National policy already restricts development in flood zones by use, no further development is likely to take place in any tidal zone. There appears to be no evidence in the plan to justify the inclusion of the policy to address known issues in Blakeney.</p> <p>229. Disproportionate for all development, need to align with requirements of local validation list. FRA are set out in national policy</p> <p>230. The policy seeks to duplicate an approach already included in the Core Strategy and emerging Local Plan. Much of flood risk policy is prescribed in national policy and guidance and there is no requirement to include such a policy in the Plan.</p> <p>231. Given its generality the policy has the potential of adding a layer of confusion and complexity that is not warranted.</p>	<p>Comment noted. Policy 10 of the Blakeney Neighbourhood Plan seeks to ensure that flood risk is not increased in Blakeney. The Quay, Westgate Street and the bottom of the High Street were all flooded with raw sewerage, as detailed in paragraph 6.160.</p> <p>Policy 10 of the Blakeney Neighbourhood Plan drafted with the assistance of the Lead Local Flood Authority and it is pleasing to see some of the elements now being included with the emerging Local Plan.</p> <p>The Environment Agency, the Lead Local Flood Authority and Norfolk Coastal Partnership have all supported Policy 10 of the Blakeney Neighbourhood Plan.</p> <p>Comment noted. In the first paragraph of Policy 10 of the Blakeney Neighbourhood Plan it clearly states “.....flood risk assessment which gives adequate and appropriate (based on scale of development.....)” It is appropriate for all development to be mindful for the potential to increase flood risk.</p> <p>Comment noted. Policy EN 10 of the Core Strategy is not specific enough, does not cover all types of flood risk and all the elements detailed in Policy 10 of the Blakeney Neighbourhood Plan.</p> <p>Comment noted. With the aid of the Lead Local Flood Authority the drafting of Policy 10 of the</p>

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		<p style="text-align: center;"><u>Conclusions</u></p> <p>232. Remove the policy or make it site specific. e.g. if allocating sites and/or there is a need to address a particular flooding issue.</p> <p>233. LLFA may advise that it is prudent to include flood policies however it is more useful to do so in relation to site specific proposals. The approach you have taken is a duplicate of what is required and adds no further detail to that that is already contained in the Local Plan. It is not locally distinctive and runs the considerable risk of being delated at examination.</p> <p>234. This policy does not contribute, in a meaningful way, to delivering sustainable development. The policy is an unnecessary duplication of existing local and national policy. Furthermore, when also taking into account the lack of a robust and locally derived evidence base this policy has not had regard to national policies and advice contained in guidance issued by the Secretary of State. Therefore this policy does not meet the Basic Conditions tests.</p> <p style="text-align: center;"><u>Recommendation</u></p> <p style="text-align: center;">Policy 10 should be removed from the Plan</p>	<p>Blakeney Neighbourhood Plan is very clear in its requirement.</p> <p>Comment noted. The Blakeney Neighbourhood Plan does not seek to allocate additional housing</p> <p>Comment noted. It is not the place of the Blakeney Neighbourhood Plan to set site specific requirements for development proposals – these requirements should be set by NNDC following Policy 10 of the Blakeney Neighbourhood Plan, once made, and with the approval and guidance of the Lead Local Flood Authority (LLFA). Policy 10 of the Blakeney Neighbourhood Plan adds specific requirements and guides the necessary actions in dealing with drainage and flooding.</p> <p>Comment noted. Policy 10 of the Blakeney Neighbourhood Plan does support the delivery of sustainable development.</p> <p>The Blakeney Baseline Data document contains extensive evidence relating to Blakeney. Therefore, Policy 10 of the Blakeney Neighbourhood Plan does meet the Basic Conditions and more details of specifically how can be found in the Basic Conditions Report the supports the Blakeney Neighbourhood Plan.</p> <p>Comment noted. Policy 10 of the Blakeney Neighbourhood Plan will remain.</p>

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		<p>239. The reference to 'green infrastructure' is entirely appropriate but should be justified by a reasoned strategy that includes mapping of identified green infrastructure opportunities in Blakeney. The suggested approach is detailed, above, at paras. 56 to 67 of this representation. Such an approach would give this policy and Policy 13 a more robust evidence and assessment based justification.</p> <p>240. The situation in planning terms is complicated and the Council is currently working with Habitat Regulation Assessment consultants and compiling evidence to inform an approach that will seek to enhance Green Infrastructure in order to remove the pressures off sensitive European sites that surround Blakeney. This is a cross boundary approach with other LPA's around the mitigation measures required due to visitor impacts. The emerging Local Plan will have a specific policy on this and it is likely that all development will be required to contribute financially (once the full scale of management priorities and enhancements to G.I. are fully costed).</p> <p>241. The health and wellbeing benefits of access to the coast, countryside and natural environment are not disputed and it is encouraging to see this recognised in the Plan policy. However, improving access to the coastline and countryside may not be</p>	<p>linkages that residents can use – promoting activity and healthy lifestyle choices.</p> <p>Comment noted. Each of the Open Spaces identified has been assessed against the criteria listed in the Blakeney Neighbourhood Plan – Historic Importance, Amenity Value and Strategic Importance - as detailed in paragraphs 6.253, 6.254 and 6.255. The outcome of the assessment is recorded in Table 2.</p> <p>Comment noted. A policy in the emerging Local Plan that will bring relief - or at least not make things worse for the village – is welcomed provided funding is directed to support the communities most effected by the continuing rising visitor numbers.</p> <p>Comment noted. NNDC has misunderstood the third paragraph of Policy 11 of the Blakeney Neighbourhood Plan, which is seeking to ensure development is not isolated and is linked to the</p>

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		<p>appropriate in all locations or at certain sensitive times of the year (for example the ground nesting bird season). This should be reflected in the policy wording.</p> <p>242. The statement that “landscape proposals must form an integral part of any development design, with particular trees and hedgerows retained unless, following surveys, their value is deemed low in accordance with established practice”, we question the use of the word ‘particular’ and would suggest omitting this. Why not seek to retain all trees and hedgerows?</p> <p>Furthermore, what is the established practice that is referred to? Is this the British Standard (BS5837)? If so, mention it specifically. A ‘low’ value tree might be better referred to as a category of C or below.</p> <p><u>Conclusions</u></p> <p>243. This is a duplication of Core strategy and emerging Local Plan policies and as currently presented the policy is not required.</p> <p><u>Recommendations</u></p> <p>244. As currently evidenced, justified and presented Policy 11 and Policy 13 should be</p>	<p>existing footpath network rather than creating new access routes. The existing network should already have consideration for the issues raised and have mitigation in place.</p> <p>Comments noted. The word ‘particular’ will be removed.</p> <p>Comment noted. BS5837 is the British Standard for Trees in relation to design, demolition and construction – Recommendations. The latest version was published in 2012 and applies to all trees that could be affected during the design, demolition or construction phase of a development. As suggested the term ‘low’ value will be replaced with category of C or below.</p> <p>Comment noted. Policy 11 of the Blakeney Neighbourhood Plan is different to the policies contained in the Core Strategy, especially linkages to existing footpaths for both biodiversity gain and wellbeing of residents.</p>

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	Policy 12	<p>significantly reworked and consolidated into a single effective Green Infrastructure policy.</p> <p>Policy 12: Preserve Dark Night Skies</p> <p>245. The stated 'Ambition' in the Plan is: <i>Preserve Dark Night Skies – seeking to maintain the 'dark skies' that characterise Blakeney through the implementation of good design principles in the planning process.</i></p> <p>246. A suggested addition to this section (at 6.226), to add weight, would be to introduce text such as "The North Norfolk Coast AONB boasts some of the darkest skies in the country which are a defining feature of one of the identified special qualities of this AONB, namely a sense of remoteness, tranquillity and wildness".</p> <p>247. At para. 6.237 the correct title is "The Campaign to Protect Rural England".</p> <p>248. The Plan should take into account the latest guidance produced by the MHLG which can be found here: https://www.gov.uk/guidance/light-pollution.</p> <p>This new comprehensive guidance looks at how to consider light within the planning system. The guidance covers:</p> <ul style="list-style-type: none"> • What light pollution considerations does planning need to address? 	<p>Comment noted. Policy 11 of the Blakeney Neighbourhood Plan is to be reworded; however, it will not include Policy 13 of the Blakeney Neighbourhood Plan as Policy 13 is specifically to preserve open space.</p> <p>Comment noted and, as suggested, additional text will be added.</p> <p>Comment noted. Amend to Campaign.</p> <p>Comment noted. Thank you for highlighting this resource.</p> <p>Comments noted. Further text will be added to the supporting text to outline the user of planning conditions to help to address the issue of light</p>

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		<ul style="list-style-type: none"> • What factors can be considered when assessing whether a development proposal might have implications for light pollution? • What factors are relevant when considering where light shines? • What factors are relevant when considering when light shines? • What factors are relevant when considering how much the light shines? • What factors are relevant when considering possible ecological impacts of lighting? • What other information is available that could inform approaches to lighting and help reduce light pollution? <p><u>Clarity and effectiveness of Policy 12</u></p> <p>249. The policy, as written, does try to add some further detail to policy EN 13, however, there are elements of the policy that are covered by permitted development rights or are the responsibility of the Highway Authority. Furthermore, the language used is not precise and is open to interpretation.</p> <p>250. The policy needs to tighten up the wording in relation to the control of the light pollution and it is not the internal lights that are the problem it is the openings and widows that allow the light to escape causing the pollution. Would large windows, a roof light or 'atria' be acceptable in a sensitive location with blinds or curtains? This could not be controlled in the future.</p>	<p>pollution - lighting schemes can also be costly and difficult to change, so getting the design right and setting appropriate conditions at the planning stage is important.</p> <p>Comment noted. Thank you for recognising that Policy 12 of the Blakeney Neighbourhood Plan adds, at a lower neighbourhood level, to the Core Strategy Policy EN 13. Development proposals, in the Blakeney Neighbourhood Area, will (once the Blakeney Neighbourhood Plan is made) be required to submit a 'statement' – this could be a separate statement or included in the Design & Access statement – of lighting intentions and likely impact. This is clear and precise. Where the Highways Authority requires the installation of highway lighting this should give consideration to reducing its impact on the quality of the dark night skies. The supporting text will be added to give more explanation.</p>

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	Policy 13	<p>251. Point 1 of the policy in relation to 'reducing the impact' should, it is suggested, say 'minimise the impact of the development on light pollution'. This would tighten up the wording of this policy. The suggestion of the submission of a 'statement of intention' would, therefore, be supported – if the text was amended accordingly.</p> <p>252. Extensions may not require planning permission and adding external lighting to existing buildings will not require planning permission.</p> <p>253. The lighting of 'public thoroughfares' is a highways issue (covered by highways permitted development rights) and the lighting of public areas may not always require planning permission.</p> <p><u>Recommendation</u></p> <p>254. Notwithstanding the lack of evidence, this policy can be seen to add to the existing Local Plan policy and, if amended as suggested, could be supported.</p> <p>Policy 13: Open Space Preservation</p> <p>255. The stated 'Ambition' in the Plan is: <i>Open Space Preservation – seeking to recognise the importance of these areas to the village for recreational, amenity and visual value. The policy is not seeking 'Local Green Space' designation.</i></p>	<p>Comment noted and text will be amended as suggested.</p> <p>Comment noted. However, where planning permission is required then, once made, Policy 12 of the Blakeney Neighbourhood Plan will apply.</p> <p>Comments noted.</p> <p>Comment noted and NNDC support is welcomed.</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
		<p>256. Open Space is defined in the NPPF as “All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.”</p> <p>257. Open Space (including Local Green Space and public rights of way) is covered in paras 96 to 101 of the NPPF.</p> <p>258. The NPPF states:</p> <p><i>Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Para. 96</i></p> <p><i>The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Para. 99.</i></p> <p><u>Evidential basis for Policy 13</u></p> <p>259. The importance, and protection, of public open space is acknowledged in the</p>	<p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted. However, the Blakeney Neighbourhood Plan does not seek Local Green Space designation – please see ambition statement (paragraph 6.240).</p>

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		<p>Plan, however, a number of the sites in 'Table 2' are already protected by existing designations (although it is difficult to fully ascertain where these sites are, and their extents, without a plan). Site's 4, 9, 11, 16 and 17 are currently designated in the Core Strategy as 'Open Land Areas'. Sites 1 & 14 are car parks. There appears to be no other associated, or ancillary, community use associated with these car parks and it is suggested that they should not be considered public open spaces. Site 3 appears to be agricultural land in the countryside and further evidence is required as to why this should be considered open space.</p> <p>260. The NPPF requires there to be a robust and up-to-date assessment of public open space to support plan making. The Nation Planning Guidance also details the criteria for designating Local Green Space.</p> <p>261. It appears that the Plan is not designating any of these sites detailed in the table as LGS. The criteria, definition and methodology (outlined at 6.253 to 6.255) for considering sites as open space doesn't appear to be followed through with a robust and up-to-date assessment of the sites in Table 2.</p> <p>262. See further detail on our suggested approach this at paras. 56 to 67 above.</p>	<p>Comment noted. With NNDC's assistance a map detailing each area of open space is currently being produced and will be in the Examination version of the Blakeney Neighbourhood Plan.</p> <p>Blakeney Neighbourhood Plan seeks to recognise areas of open space which make an important contribution to the appearance of an area, as well as opportunities for informal or formal recreation and green space. While some of these areas are recognised within the Core Strategy Policy CT 1 Open Space Designations Policy 13 of the Blakeney Neighbourhood Plan makes further requirement of community support and the identification of benefit.</p> <p>Comment noted. However, the Blakeney Neighbourhood Plan does not seek Local Green Space designation – please see ambition statement (paragraph 6.240).</p> <p>Comment noted. The sites identified in Table 2 have been assessed using the methodology detailed.</p>

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		<p data-bbox="689 256 1167 284"><u>Clarity and effectiveness of Policy 13</u></p> <p data-bbox="640 323 1279 778">263. This policy adds very little to current development plan in Policy CT1, beyond the list of sites in the table. It does add in the notion of development having 'community support'. However, the nature and level of this support is not defined or quantified. Is it the majority support of the village, is it the support of the Parish Council? Would any support (in the face of no wider objection) be acceptable? The arbiter of the application of this element of the policy would have to be the planning authority and it is difficult to apply without further qualification or explanation.</p> <p data-bbox="640 818 1279 1010">264. Although the Plan states that they are not designating the sites as 'Local Green Space', by having a policy that seeks to preserve the listed open space sites – the Plan is, in effect, applying an open space designation.</p> <p data-bbox="640 1050 1279 1145">265. An opportunity has been missed in relation to Open Space and Green Infrastructure as detailed at paras. 56 to 67.</p> <p data-bbox="689 1185 936 1209"><u>Recommendations</u></p> <p data-bbox="640 1249 1279 1401">266. As currently evidenced, justified and presented Policy 11 and Policy 13 should be significantly reworked and consolidated into a single effective Green Infrastructure policy. See paras. 56 to 67 for our suggested</p>	<p data-bbox="1335 292 1928 323">Comment noted. Please see earlier responses.</p> <p data-bbox="1335 459 2011 587">Comment noted. However, it is the identification of the eighteen areas and their preservation that is must be seen as the value add od Policy 13 of the Blakeney Neighbourhood Plan.</p> <p data-bbox="1335 627 2011 715">Comment noted. Policy will be updated to reflect Community support being defined as the support of the Blakeney Parish Council.</p> <p data-bbox="1335 954 1559 978">Comment noted.</p> <p data-bbox="1335 1185 2011 1241">Comment noted. Please see earlier responses above to comments (56 to 67).</p>

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	Policy 14	<p>approach in relation to Green Infrastructure. An adoption of this approach would be seen to add to the existing Local Plan policy and, if amended as suggested, would be acceptable.</p> <p>However, if the policy is to remain - further justification and evidence is required (with mapping) to support the sites included.</p> <p>Policy 14: Sustainability of Open Spaces</p> <p><u>Evidential basis for Policy 14</u></p> <p>267. The stated 'Ambition' in the Plan is: <i>Sustainability of Open Spaces – seeking to ensure appropriate steps are taken to ensure open spaces (play areas, formal and informal recreational areas, etc.) are managed, maintained and funded in a sustainable way.</i></p> <p>268. It is a laudable aim at 6.261., however, there is no evidence presented in the Plan that the lack of funding for maintenance or folding of management companies has been a particular problem or issue in Blakeney.</p> <p>269. The general approach laid out in this policy is considered to be is too prescriptive. This element of development would be secured via a S106 agreement and would require site by site negotiations. This is more of</p>	<p>Comment noted. It is not appropriate to combine Policy 11 and Policy 13 of the Blakeney Neighbourhood Plan. These two policies do different things and to consolidate into one policy would make the purpose of the one policy unclear. It is far better to retain Policy 13, which seeks to specifically to preserve open space, not just 'green' space while Policy 11 focusses on biodiversity and accessibility.</p> <p>Comment noted. A map detailing each location of open space will be added to the Examination version of the Blakeney Neighbourhood Plan.</p> <p>Comment noted. While this hasn't been a problem for Blakeney, the Blakeney Neighbourhood Plan seeks to reduce the likelihood of this becoming a problem in the future in the same way it has to so many other communities where the Parish Council or District Council have had no alternative but to step in without funding.</p>

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		<p>an issue that is covered through the planning process, rather than something that can be effectively managed at NP level</p> <p>270. Suggest that wording is amended to: <i>Where new development provides elements of green infrastructure and public open space, effective future management and maintenance will be secured via a S106 agreement.</i></p> <p><u>Clarity and effectiveness of Policy 14</u></p> <p>271. Policy 14 appears to be a copy of Policy 8 in the Aylsham Neighbourhood Plan. Which, as previously stated in relation to other copied policies, the Aylsham plan would have</p>	<p>Comment noted. Policies in the Development Plan (including those in the Blakeney Neighbourhood Plan, once made) should clearly set out requirements that enable the developer to understand the requirements and, as in this situation, make a choice about which of the three options available to them is chosen. If a management company (option 1) is chosen then it is reasonable to ensure that company as a track record, funding and income source to meet the management plan.</p> <p>Should ownership be offered to the Parish Council (option 2), the preferred solution, then the developer is aware upfront that it would be transferred with a commuted sum (equivalent to 10 years upkeep and maintenance costs) – this is less onerous than the current requirement set out in the Core Strategy.</p> <p>Or North Norfolk District Council decide to take on ownership developer contributions and requirements are set out in Policy CT 2 of the Core Strategy.</p> <p>Comment noted. A Section 106 agreement would be used to ensure commitment from a developer of the requirement of Policy 14 of the Blakeney Neighbourhood Plan. The suggested wording will not be used as this weakens and removes the requirements of Policy 14 of the Blakeney Neighbourhood Plan. Offering no more than is in the Core Strategy. Policy 14 of the Blakeney Neighbourhood Plan should provide more certainty and contribute to the delivery of sustainable development.</p>

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	Theme 3 Policy 15	<p>had its own locally derived evidence base and may well have had a clear rationale for the inclusion of such a policy.</p> <p>272. Policy CT 2 in the Core Strategy does cover the prospect of securing developer contributions for the maintenance of public open space, however, it could be accepted that this policy adds further detail to that policy. It is suggested that all 3 management mechanism would need to demonstrate that there is appropriate funding provided and it is suggested that the finance for the maintenance should cover 15yrs and not the 10yrs in the policy. This is in line with the general practice at NNDC.</p> <p><u>Conclusion and recommendation</u></p> <p>273. Notwithstanding the lack of evidence, this policy can be seen to add to the existing Local Plan policy and, if amended as suggested, would be acceptable.</p> <p>Theme 3: Local Economy and Tourism.</p> <p>Policy 15: Local Employment</p> <p>274. The stated 'Ambition' in the Plan is: <i>Local Employment – seeking to protect existing and encourage creation of local employment that is appropriate to Blakeney,</i></p>	<p>Comment noted. Please see earlier responses above in relation to the reuse of Neighbourhood Plan policies, with over 800 made Neighbourhood Plans it is now usual for Steering Groups to look at these Neighbourhood Plans for guidance on what will successfully pass examination – rather than 'reinventing the wheel' – and then use local evidence and justification.</p> <p>Comment noted.</p> <p>Comment noted. Will update funding period to 15 years to align with NNDC's approach.</p> <p>Comment noted.</p>

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		<p><i>which will strengthen and improve sustainability of the local economy.</i></p> <p><u>Evidential basis for Policy 15</u></p> <p>275. There isn't a great deal of evidence presented to support this section. The statement at 6.270 is not supported by evidence.</p> <p>276. If the Plan is considering introducing policies in relation to jobs and the economy it should have look to produce 'economic evidence paper' or study. This would explore in detail (and with a Blakeney focus) the issues around the economy, employment, tourism, service provision, the housing market and the other factors that influence the overall economic sustainability of Blakeney. A comprehensive evidence base which considers all of the economic influences in Blakeney could have gone some way in justifying a number of the policies.</p> <p><u>Clarity and effectiveness of Policy 15</u></p> <p>277. It is not clear what the development proposals are that would be '<i>appropriate to a coastal village</i>' and there are concerns that the policy is potentially seeking to restrict development to a limited number of employment uses such as farming, agriculture or traditional industries. As stated above there</p>	<p>Comment noted. The Blakeney Baseline Data report specifically details that 39% of residents travel to work by car or are driven with c70% of people traveling over 2km to work. More local business and jobs should be encouraged to reduce the dependence on the car and reduce distances travelled.</p> <p>Comment noted. This would duplicate much of the work undertaken in the two studies commissioned by NNDC - Business and Investment Opportunities (2015) and North Norfolk Retail and Main Town Centre Uses (2017) – referred to in paragraphs 6.271 to 6.273.</p> <p>Comment noted. The Blakeney Baseline Data report specifically details the employment demographics, covering such things as employment type,</p>

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		<p>is no analysis of the economic activity in Blakeney and whether the suggested restrictions are corroborated by the evidence.</p> <p>278. A development that creates 'home working' opportunities could be a residential dwelling with a study or part of the dwelling which could be used for an office, studio, salon, etc. As long as such a development meets criteria 1 to 3 the Plan would support it. It could also apply to any employment related development outside the settlement boundary. This permissive approach may be in conflict with other policies in the Plan and the Core Strategy, in particular, Policy SS 5.</p> <p><u>Conclusions</u></p> <p>279. No substantive evidence has been presented to support the inclusion of the policy and the policy as written, lacks clarity and conflicts with Core Strategy policies and other policies in the Plan.</p> <p>280. This policy does not contribute, in a meaningful way, to delivering sustainable development. Furthermore, when also taking into account the lack of a robust and locally derived evidence base this policy has not had regard to national policies and advice contained in guidance issued by the Secretary of State. Therefore this policy does not meet the Basic Conditions tests.</p> <p>Recommendation</p>	<p>employment areas, key services and education qualifications. Policy 15 of the Blakeney Neighbourhood Plan seeks to support local employment through job creation and home-working.</p> <p>Comment noted. The Blakeney Neighbourhood Plan does support the generation of local employment that meets these criteria, this does not negate the need for any such development to meet the other relevant policy requirements of the Blakeney Neighbourhood Plan, Core Strategy or other policies of the Development Plan.</p> <p>Comment noted. Please see earlier comments above and the Blakeney Baseline Data Report.</p> <p>Comment noted. Policy 15 of the Blakeney Neighbourhood Plan supports local employment, contributes to sustainable development, does have regard to national policy.</p>

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	Policy 16	<p>281. Policy 15 should be removed from the Plan.</p> <p>Policy 16: Retention of Business Premises for Blakeney</p> <p>282. The stated 'Ambition' in the Plan is: <i>Retention of Business Premises for Blakeney – seeking to retain the limited number of existing buildings used for commercial activities.</i></p> <p><u>Evidential basis for Policy 16</u></p> <p>283. The information presented at 6.280 to 6.282 does not provide an evidence base in relation to the need to retain businesses in Blakeney as expressed in the 'Ambition'. No local or specific Blakeney data has been presented. In fact the policy does not seem to flow from the reasons/justifications listed which appear to describe matters relating to tourism.</p> <p><u>Clarity and effectiveness of Policy 16</u></p> <p>284. The header of this section is titled "<i>Retaining Local Services and Retail</i>", the justification discusses <i>tourism</i>, the Ambition mentions "<i>Retention of Business Premises...</i>" and the text of the policy describes "<i>commercial premises</i>". This is a confusing and muddled approach – is it local services,</p>	<p>Comment noted. Policy 15 of the Blakeney Neighbourhood Plan does meet the Basic Conditions tests.</p> <p>Comment noted. Policy 15 of the Blakeney Neighbourhood Plan will remain.</p> <p>Comment noted. However, details contained in the two NNDC commissioned studies does provide details, through the findings, of what is happening in North Norfolk and specific areas. More evidence is provided in the Blakeney Baseline Data report covering such things as employment type, employment areas and key services. Policy 16 of the Blakeney Neighbourhood Plan seeks to support the retention of business premises in Blakeney and the knock-on effect of retaining local jobs.</p> <p>Comment noted. However, NNDC seem somewhat pedantic and causing confusion – where done exists. For example: for the garage to continue to provide local access to fuel or the Spar shop to</p>

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		<p>business or commercial premises that the Plan is seeking retention?</p> <p>285. An interpretation of the policy could also suggest that the change of use between any use class would be acceptable as long as the proposal retains the 'commercial premises'. As the policy seeks to retain the commercial premises – but does not explicitly state there is an aim to retain commercial use or business use. There could be an interpretation that the fabric of the commercial premises could be retained whilst the use is changed to residential or some other non- employment generating use.</p> <p>286. The qualifying criteria uses “or” and not “and” – was the intention? For example, a change of use application from a shop (or other service considered important to the village) to a less desirable 'commercial' use would be supported by the Plan if it only met one of the qualifying criteria.</p> <p>287. The permissive and especially imprecise approach in the policy is in conflict with other policies in the Blakeney Plan and the Core Strategy, in particular, Policy SS 5.</p> <p><u>Conclusions</u></p> <p>288. No substantive evidence has been presented to support the inclusion of the policy. The policy as written, lacks clarity and</p>	<p>continue to provide a local shop both need premises to operate from (for the avoidance of doubt neither are believed to be under threat). For most local services and retail a premise is needed.</p> <p>Comment noted. Again, NNDC seem to have missed the point. The ambition statement, at paragraph 6.279, clearly state the intent of Policy 16 of the Blakeney Neighbourhood Plan is to retain the existing buildings for commercial activities. Commercial activities does not include residential use.</p> <p>Comment noted. Will reword Policy to be explicit the retention supported is for commercial activities.</p> <p>Comment noted. Policy 16 of the Blakeney Neighbourhood Plan will be reworded to 'and' rather than 'or' as the intention is that both criteria are applied - rather than meeting only one or other of the criteria.</p> <p>Comment noted. Policy 16 of the Blakeney Neighbourhood Plan supports the delivery of sustainable development and the local community.</p>

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	Policy 17	<p>conflicts with Core Strategy policies and other policies in the Plan.</p> <p>289. This policy does not contribute, in a meaningful way, to delivering sustainable development. Furthermore, when also taking into account the lack of a robust and locally derived evidence base this policy has not had regard to national policies and advice contained in guidance issued by the Secretary of State. Therefore this policy does not meet the Basic Conditions tests.</p> <p><u>Recommendation</u></p> <p>290. Policy 16 should be removed from the Plan.</p> <p>Policy 17: Tourism</p> <p>291. The stated 'Ambition' in the Plan is: <i>Tourism – seeking to balance the provision of facilities in Blakeney for the benefit of residents, the local community and visitors whilst minimising the social and environmental impact.</i></p> <p>292. The policy and justification should make reference to the Norfolk Recreational Avoidance and Mitigation Strategy (RAMS) which is currently in draft form and we can provide further details on this work. Mitigation for all development will come through the Local Plan due to issues identified in the HRA.</p>	<p>Comment noted. The evidence is provided in the Blakeney Baseline Data Report and the two studies commissioned by NNDC.</p> <p>Comment noted. Policy 16 of the Blakeney Neighbourhood Plan supports the delivery of sustainable development, evidence is provided in the Blakeney Baseline Data Report and reference is made to the two studies commissioned by NNDC. Therefore, Policy 16 of the Blakeney Neighbourhood Plan does meet the Basic Conditions tests.</p> <p>Comment noted. Policy 16 of the Blakeney Neighbourhood Plan will remain.</p> <p>Comment noted. The Norfolk Recreational Avoidance and Mitigation Strategy (RAMS) document has not been published, even in draft form, therefore it is difficult for the Blakeney</p>

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		<p>To date the Plan has not been informed by such so it is hard to see there is the evidence to support the approach.</p> <p><u>Evidential basis for Policy 17</u></p> <p>293. The Plan has not presented a balanced evidence based assessment into all the benefits, and dis-benefits, of tourism (including second homes and holiday accommodation) on the local economy and housing market. On the one hand the Plan is suggesting a number of negatively worded policies which seek to restrict the availability of holiday accommodation and on the other hand, in this policy, is welcoming development that has the potential to expand tourism in the parish.</p> <p>294. A detailed report was been produced in 2017 that looked at the Economic Impact of Tourism in North Norfolk (here: https://www.north-norfolk.gov.uk/media/3681/economic-impact-of-tourism-north-norfolk-report-2017.pdf) and it is suggested that this evidence should have been referenced or built upon to provide a Blakeney focus.</p>	<p>Neighbourhood Plan to reference a document whose content is unknown. A copy of the RAMS document has been requested from NNDC (4th February 2020, the response received “...unfortunately, has not yet been finalised. We are expecting the final draft to be produced Feb/March time.” Why would NNDC ask in November 2019 to reference a document that is not available.</p> <p>Comment noted. NNDC have agreed to undertake the Habitat Regulation Assessment on the examination version of the Blakeney Neighbourhood Plan.</p> <p>Comment noted.</p> <p>Comment noted. The report will be added to the supporting text and referenced documents. It should be noted that the report is 'generic' by its nature – taking information at a regional level (the East of England region) and then applying assumptions (the Cambridge Model) to overlay on to North Norfolk – “the results of the model should therefore be</p>

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		<p style="text-align: center;"><u>Clarity and effectiveness of Policy 17</u></p> <p>295. Point 1 & 2. Environmental Impact Assessments will not be required for the majority of tourism related developments. The thresholds for when an EIA is required is contained in National regulations and cannot be imposed by the Plan.</p> <p>296. Point 3. Is it not more appropriate to point to the Conservation Area Appraisal and Design Guide rather than the Landscape Character assessment?</p> <p>297. The policy currently suggests that as long as development meets the criteria in the policy – all tourism development is acceptable. This could potentially include the building of holiday accommodation and second homes. An open interpretation of this policy would be in conflict with the Plan Policies 2,3,4,5?</p> <p style="text-align: center;"><u>Conclusion</u></p> <p>298. The policy conflicts with National Policy, Core Strategy Policies on tourism, and related development, at EC7, EC8 & EC10. In particular, the policy, as currently written, conflicts with the sequential test in EC7.</p>	<p>regarded as estimates....." Within the report there is no specific detail relating to North Norfolk or Blakeney. This is not evidence, instead just "indicative" of activity.</p> <p>Comment noted. An assessment of impact is appropriate and will be expected to be proportion to the size and scale of development proposal.</p> <p>Comment noted. As suggested will be amended to reference the Conservation Area Appraisal and Design Guide.</p> <p>Comment noted. Policy 17 of the Blakeney Neighbourhood Plan does welcome Tourism development – the exact wording being "supported and encouraged" – provided the criteria are met. However, for tourism development to be "acceptable" (ie. Gain planning permission) it must meet the policy requirements of the Development Plan, including all policies in the Blakeney Neighbourhood Plan.</p> <p>Comment noted. However, NNDC are incorrect. Policy 17 of the Blakeney Neighbourhood Plan complements National Policy and policies in the Development Plan. The requirements of Policy EC 7 of the Core Strategy (as with all relevant policies of</p>

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	Section 8	<p>299. This policy does not contribute, in a meaningful way, to delivering sustainable development. Furthermore, when also taking into account the lack of a robust and locally derived evidence base this policy has not had regard to national policies and advice contained in guidance issued by the Secretary of State. Therefore this policy does not meet the Basic Conditions tests.</p> <p>Recommendation</p> <p>300. Policy 17 should be removed from the Plan.</p> <p>Implementation, Delivery and Monitoring.</p> <p>301. The Plan does not mention in this section any review mechanisms. Given the NNDC are likely to produce a new Local Plan in the next 2 to 5 years it is likely that a number of the Plan policies will be out of date or superseded. The Plan, in line with guidance, and to reflect potential change in policy or circumstances should include reference to a future review – which could be of the whole Plan or individual policies.</p> <p>*****</p>	<p>the Core Strategy) would have to be met by any development proposals.</p> <p>Comment noted. Policy 17 of the Blakeney Neighbourhood Plan provides support and encouragement to development proposals that create new or expand existing tourism in Blakeney. Therefore, helping to maintain the local economy and sustainability community. Policy 17 aligns to and is complementary to existing policies at all levels – meeting the Basic Conditions test.</p> <p>Comment noted. Policy 17 of the Blakeney Neighbourhood Plan will remain.</p> <p>Comment noted. Paragraph 8.3 of the Blakeney Neighbourhood Plan states “ the Blakeney Neighbourhood Plan will be reviewed every five years and revised where appropriate.”</p> <p>*****</p>

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			<p>This detailed response from the Steering Group was sent to North Norfolk District Council with a request for meetings to discuss in detail.</p> <p>North Norfolk District Council agreed that a meeting would be productive and despite the difficulties presented by COVID-19 agreed, after a number of rearrangements, to a meeting virtually on Monday 30th November 2020 starting at 19:00.</p> <p>Sadly, at 16:06 on 30th November 2020 the Senior Planning Officer advised</p> <p>"I will no longer be able to attend the Steering Group meeting this evening.</p> <p>Having reviewed the Consultation Feedback extract and the revised Plan, I think we now need to focus on getting the Blakeney Neighbourhood Plan to submission/examination."</p> <p>It was disappointing that the much sort after meeting with the Planning Officer was cancelled at only a few hours notice. Although the Steering Group have seen this as a positive that North Norfolk District Council want "to focus on getting the Blakeney Neighbourhood Plan to submission/examination."</p> <p style="text-align: center;">*****</p> <p>Proposed action:- Comments noted and the following changes to the BNHP are proposed:-</p> <p>Executive Summary: Add words to emphasised sustainable development.</p>

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			<p>Third paragraph: Amend “Local Plan” to “Development Plan”.</p> <p>Four paragraph: Reworded by deleting “<i>traffic, pavements, cycle routes and such</i>”.</p> <p>Executive Summary: Add words to emphasised sustainable development.</p> <p>Third paragraph: Amend “Local Plan” to “Development Plan”.</p> <p>Four paragraph: Reworded by deleting “<i>traffic, pavements, cycle routes and such</i>”.</p> <p>Section 2: Additional words will be added to text to introduce the heritage of Blakeney.</p> <p>Section 4: Objective 1 – reword to “To accommodate appropriate change and development so that the intrinsic character and appearance of the village is retained and enhanced.”</p> <p>Paragraph 5.31: Add additional text - “this is North Norfolk District Council’s choice of the site that came forward and their preference for further residential development. However, alternative sites have been proposed, some local residents have specifically supported BLA1, and the District will consider these and include them in their future consultation.”</p> <p>Policies: review all policies for ambiguity, duplication, conformity and repetition issues, both between policies and also with statutory plans.</p>

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			<p>Update job title to “Housing Strategy & Delivery Manager”</p> <p>6.30: Delete “eleven” and replace with “ten”</p> <p>Figure 3: Check data and update if necessary.</p> <p>6.55 Ambition: Amend ambition statement to “seeking to safeguard the sustainability of Blakeney village by limiting the number of second homes and increasing the number of principal homes.</p> <p>Table 1: update Table 1 with the new data provided and supporting text in paragraph 6.58.</p> <p>6.62: Delete paragraph.</p> <p>Policy 2 supporting text: Add support test “An analysis, albeit limited in scope, of the impact on house prices on coastal villages in Cornwall following the ‘Principal Residence’ policy of the St.Ives Neighbourhood Plan has been carried out. Source: https://cornwalldevelopersparadise.wordpress.com/2019/11/22/the-case-of-the-research-study-that-wasnt-st-ives-second-home-ban/</p> <p>It states if the experience in St Ives is different, then this may well indicate an effect of the second home ban.</p> <p>If we compare the past four years of price changes, from 2015 to 2019, at the Middle Super Output Area level, prices of new houses at St Ives have indeed</p>

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			<p>fallen, and by 14%, close to the figure cited in the press.</p> <p>However, the numbers of new houses sold were extremely low, just a handful a year, which makes any price change index volatile.</p> <p>In addition, other places in Cornwall saw even greater falls in this same period:-</p> <ul style="list-style-type: none"> • St Austell prices of new housing fell by 43%. • Wadebridge new house prices were down by 38%. • Lanreath and Duloe the fall was 18%, • St Minver and St Kew it was 17%. <p>In none of these places was there a ban on new build second homes in this period.</p> <p>Meanwhile, prices of existing stock did indeed rise in St Ives, by 28% over this same period. But they also rose and at a very similar rate, in other coastal areas of Cornwall: -</p> <ul style="list-style-type: none"> • West Penwith the rise was 30% • Roseland 27% increase • Wadebridge up by 28% • In parts of Falmouth increased by 29% • Padstow and St Merryn a rise of 35%. <p>In none of these areas was there a ban on new build second homes in this period.</p> <p>There is no evidence at all that the ban on second homes is the cause of the price rise in the existing</p>

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			<p>housing at St Ives. Other areas with similar second home demand have experienced very similar price changes since 2015.</p> <p>The actual causes of this look likely to lie in more general factors, not the specific St Ives ban. The headline in the <i>Telegraph</i>, that the ban ‘led to [the] rise in house prices’ is false, misleading and unsupported by the data. Posted on November 24, 2019</p> <p>Comments made by Andrew Mitchell, Cornwall councillor for St Ives West and Cornwall Council Cabinet Portfolio Holder for Homes. He is reported to have said the issue of high housing prices had been going on for 30 years and insisted he had not encountered anyone in the town complaining of being priced out as a result of the ban.</p> <p>He said: "I think it is too early to tell and we need three, four or even five more years before we can say whether the ban has made things worse."</p> <p>"I don't think we have had enough large-scale developments in the towns for anyone to point the finger at the second homes ban as a good or bad thing." Posted: 31 October 2019 CornwallLive Source: https://www.cornwalllive.com/news/cornwall-news/st-ives-second-homes-ban-3481749</p> <p>Policy 3: Delete the word “new” from the final paragraph.</p>

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			<p>Policy 4: Replace the final paragraph with “This policy does not apply to the change of use, or replacement of chalets, static caravans, or other buildings or structures which are not suitable for permanent occupation.”</p> <p>6.90: Amend text by deleting “sui generis use” and reword to “..... properties that are classified and registered as holiday lets or have holiday usage restrictions.”</p> <p>Policy 5: Amend title to “Extensions to Holiday Let Accommodation”.</p> <p>6.95: Add text to reference the National Design Guide (September 2019) and North Norfolk Design Guide (SPD) also add National Design Guide (September 2019) to list of supporting documents in 6.132 and 6.152.</p> <p>6.135: Add to end of sentence “”such as Stratton Long Marine, Westgate Street and Michaelmas, Langham Road.</p> <p>Policy 8: Insert “brownfield” in front of “... redevelopment sites...”.</p> <p>6.145: Reword ambition to “ ... seeking to provide sustainable development that is appropriate in size and enhances the surrounding street scene’.</p> <p>6.172: Add “North Norfolk Strategic Flood Risk Assessment”</p>

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			<p>6.178: Insert a new paragraph “The saltmarsh habitat immediately north of the settlement is an internationally rare landscape protected through its designation as part of the North Norfolk Coast Special Area of Conservation (SAC), Special Protection Area (SPA), SSSI and Ramsar.”</p> <p>6.197 to 6.208: Move these paragraphs to the supporting text in the Built Environment section.</p> <p>6.213: Add to the supporting text reference to the draft Environment Bill (Policy Statement July 2019).</p> <p>Policy 11: Delete the word “new” in the first sentence and the word “particular” in the second paragraph, also in this paragraph replace the term “low value” with “category of C or below” and then reword the policy.</p> <p>6.226: Add text after the word ‘country’ “.... country, which is a defining feature of one of the identified special qualities of this Area of Outstanding Natural Beauty, namely a sense of remoteness, tranquillity and wildness”.</p> <p>6.237: Replace the word “Council” with “Campaign”.</p> <p>Dark Night Skies: Add to supporting text after paragraph 6.227 “ Lighting schemes can also be costly and difficult to change, so getting the design right and setting appropriate conditions at the planning stage is important.”</p> <p>“When used properly, conditions can enhance the quality of development and enable development to</p>

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			<p>proceed where it would otherwise have been necessary to refuse planning permission, by mitigating the adverse effects. The objectives of planning are best served when the power to attach conditions to a planning permission is exercised in a way that is clearly seen to be fair, reasonable and practicable. It is important to ensure that conditions are tailored to tackle specific problems, rather than standardised or used to impose broad unnecessary controls.</p> <p>Paragraph: 001 Reference ID: 21a-001-20140306”</p> <p>“Paragraph 55 of the National Planning Policy Framework makes clear that planning conditions should be kept to a minimum, and only used where they satisfy all the following tests:</p> <ul style="list-style-type: none"> a) necessary; b) relevant to planning; c) relevant to the development to be permitted; d) enforceable; e) precise; and f) reasonable in all other respects.” <p>“ The ‘statement of intent’ should be appropriate to the scale of development, whether a separate statement or included in the Design & Access statement detailing lighting intentions and likely impact.”</p> <p>“Where the Highways Authority does require the installation of highway lighting this should be designed to give consideration to reducing its impact on the quality of the dark night skies.”</p>

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			<p>Policy 12: In the first paragraph of policy text replace the words “reducing the impact of” with “minimise the impact of the development on” light pollution’.</p> <p>Policy 13: Reword policy to include community support being defined as the Parish Council. Table 2: Add map of Open Spaces.</p> <p>Policy 14: Update funding time period to 15 years.</p> <p>Policy 16: Add the words “... for commercial activities...” afterin Blakeney for... and replace “or” with “and”.</p> <p>Policy 17, criteria 3: Amend the words “...Landscape Character assessment...” for “... Conservation Area Appraisal and Design Guide”</p> <p>Appendix 2: Add “National Design Guide (September 2019)” and “North Norfolk Strategic Flood Risk Assessment” to the list.</p>
<p>PS/28 National Grid</p>		<p>Blakeney Neighbourhood Plan Consultation SUBMISSION ON BEHALF OF NATIONAL GRID</p> <p>National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.</p> <p>About National Grid</p>	<p>Thank you for your response.</p> <p>Comment noted.</p>

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		<p>National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales and National Grid Electricity System Operator (NGESO) operates the electricity transmission network across the UK. The energy is then distributed to the eight electricity distribution network operators across England, Wales and Scotland.</p> <p>National Grid Gas plc (NKG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.</p> <p>National Grid previously owned part of the gas distribution system known as 'National Grid Gas Distribution limited (NKGDL). Since May 2018, NKGDL is now a separate entity called 'Cadent Gas'.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect National Grid's assets.</p> <p>Specific Comments</p> <p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines.</p>	<p>Comments noted.</p> <p>Comments noted.</p> <p>Comment noted.</p> <p>Comment noted, hence the inclusion of National Grid as one of the stakeholders and your direct receipt of stakeholder emails.</p> <p>Comment noted.</p>

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		<p>National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</p> <p>Electricity Distribution</p> <p>The electricity distribution operator in North Norfolk Council is UK Power Networks. Information regarding the transmission and distribution network can be found at: www.energynetworks.org.uk</p> <p>Appendices - National Grid Assets</p> <p>Please find attached in:</p> <ul style="list-style-type: none"> • Appendix 1 provides a map of the National Grid network across the UK. <p>Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database.</p>	<p>Comment noted and thank you for confirming you have no key assets within the Blakeney Neighbourhood Area.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted, names and contact details will be added.</p> <p>Proposed action:- Comments noted and no changes to the BNHP are proposed.</p>
<p>PS/29 Blakeney Resident</p>		<p>Agree with Policies 1, 3, 5, 6, 8, 9, 11, 12, 13, and 14.</p> <p>Disagree with Policies 4 and 7.</p> <p>'Undecided' on Policies 2, 10, 15, 16 and 17.</p> <p>Overall agree with the Neighbourhood Plan.</p>	<p>Thank you for your support.</p> <p>Disagreement noted.</p> <p>Uncertainty noted.</p> <p>Support noted.</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
	Policy 2	Undecided, I'm not sure it will have the desired effect.	Comment noted. Based on outcomes achieved by other neighbourhood plans it is believed that this policy will start to curb the increasing number of predominately empty second homes by making new built homes principle residences, although it is recognised that this will have no impact on the existing second homes. It was felt that, where it could be addressed, action should be taken to start to address the problem
	Policy 3	Yes. Agree where a material change occurs - subdivision, no provision for parking, etc..	Comment and supported noted.
	Policy 4	No. Perhaps on a case by case – but I don't like “backdating” this concept to existing properties.	<p>Comment noted. It is felt that if ‘holiday accommodation’ (which by its very nature as a business is occupied frequently throughout the year) should cease to be used for this purpose than it should become a ‘principle residence’ rather than a second home and stand empty for long periods of time.</p> <p>This is something that any current or future owner of a recognised ‘holiday accommodation’ (sui generis usage) will be able to take account of in their choices and decision making.</p>
	Policy 7	I'm not sure all legacy property could be converted to meet this extensive list so I don't agree with this being applied to replacement homes.	Comment noted. This policy will improve the quality of home design and there is nothing within the policy criteria that could not be easily incorporated into the design of any home.
	Policy 10	Undecided = Sounds overkill if applied to small infill or replacement schemes.	Comment noted. No new development should have a negative impact on flood risk. Within the wording

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	<p>Policy 15</p> <p>Policy 16</p> <p>Policy 17</p> <p>Overall</p>	<p>Undecided. I'd accept some adverse impact if it created new jobs, there is always a trade off.</p> <p>Ditto.</p> <p>Again I am nervous this could stifle development, growth and jobs.</p> <p>I'd like to see it succeed please see other comments.</p>	<p>of the first paragraph of the policy it does recognised the need to be appropriate and “based on scale of development” to pick up your comment.</p> <p>Comment noted. Whilst new local jobs are important to all age groups and their creation supported it should not be at any cost – hence the requirements to be mindful to the impact on amenities, environment and the immediate surroundings, be suitable for a small village and not to damage the beautiful landscape - Area of Outstanding Natural Beauty (AONB).</p> <p>Comment noted. Support is available but NOT at any cost.</p> <p>Comment noted. Again, support and encouragement is available to promote appropriate growth in tourism, which is an sector that is so important to Blakeney.</p> <p>Support noted and comments have been noted and, hopefully, addresses in the responses above.</p> <p>Proposed action:- Comments noted and no changes to the BNHP are proposed.</p>
<p>PS/30 Norfolk Wildlife Trust</p>	<p>Policy 7</p>	<p>Thank you for consulting Norfolk Wildlife Trust on the draft neighbourhood plan. Our comments are given below.</p> <p><u>Policy 7: Improving Design of New and Replacement Homes</u></p>	<p>Thank you for your response.</p>

No.	Policy / Theme / Section	Response Received	Neighbourhood Plan Comment and Action
	Policy 11	<p>We support the reference in the supporting text (para 6.126) to encouraging developments that are more energy efficient and making use of opportunities to use green sources of energy wherever possible. Given the negative impacts on wildlife of climate change in the future we recommend that policy criteria 5 is revised to include targets for energy efficiency and renewable energy provision from all new development, to ensure that new development in the plan area contributes to national carbon reduction and climate adaptation goals set nationally.</p> <p>The following document produced jointly by the Royal Town Planning Institute and the Town & Country Planning Association provides useful advice on setting appropriate targets for energy provision and efficiency - https://www.rtpi.org.uk/media/3152143/Rising%20to%20the%20Climate%20Crisis.pdf</p> <p><u>Policy 11: Biodiversity and Accessibility</u> We support the inclusion of an objective and specific policy on biodiversity in the plan.</p> <p>We recommend that wherever reference is made to the protection and preservation of wildlife that it is updated to include reference to restoration and enhancement as well.</p> <p>The most recent State of Nature report (2019) indicates the pressures that our wildlife is facing. This is reflected in the National Planning Policy</p>	<p>Comments noted. As you are aware, for a small coastal village climate changes have the potential to have devastating impacts on Blakeney. We have already seen the effect of the recent flood surges in 2013.</p> <p>Comment noted, sadly, following Government guidance it is no longer possible for any neighbourhood plan to have specific requirements on energy efficiency or the level of use of renewable energy.</p> <p>Comment noted and thank you for highlighting this resource. The document will be added to the list of supporting documents for Policy 7 and the reference documents in Appendix 2.</p> <p>Comment and support noted.</p> <p>Comment noted.</p> <p>Comments noted.</p>

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		<p>Framework (NPPF) to delivery of biodiversity net gain in new development, and supported by the aspirations of the recent Environment Bill. The policy text currently requires biodiversity enhancements for new green infrastructure, and for all new development to maximise opportunities for enhancing green infrastructure, but only supports features that encourage wildlife.</p> <p>We strongly recommend that the middle paragraph is updated to require a net gain for biodiversity from all new development, in line with the recommendations of the NPPF. The means for calculating this have been provided by DEFRA, proportional to the scale of the development.</p>	<p>Comment noted. Policy will be reworded to include reference to 'net gain for biodiversity'.</p> <p>Proposed action:- Comments noted and the following changes to the BNHP are proposed: -</p> <p>6.219: Add to supporting text after “... preserved and/or restored and enhanced”</p> <p>6.132: Add ““Rising to the Climate Crisis - A guide for Local Authorities on Planning for Climate Change (May 2018)”” to the list of supporting documents.</p> <p>Policy 11: Reword the start of the third paragraph to “New development must demonstrate how it delivers a ‘net gain’ in biodiversity and improves connections with existing footpaths”.</p> <p>Appendix 2: Add “Rising to the Climate Crisis - A guide for Local Authorities on Planning for Climate Change (May 2018)” to the list reference documents.</p>

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<p>PS/31 Blakeney Resident</p>		<p>Agree with all 17 Policies.</p> <p>Disagree with none of the Policies.</p> <p>Overall agree with the Neighbourhood Plan</p>	<p>Thank you for your support.</p> <p>Thank you for supporting the Blakeney Neighbourhood Plan.</p> <p>Proposed action:- Comments noted and no changes to the BNHP are proposed.</p>
<p>PS/32 Blakeney Resident</p>	<p>Policy 1</p>	<p>Agree with all 17 Policies.</p> <p>Disagree with none of the Policies.</p> <p>Overall agree with the Neighbourhood Plan.</p> <p>Yes. ? Do people brought up in Blakeney, who may have subsequently moved away, qualify?</p> <p>If so for how long would they need to have lived there?</p>	<p>Thank you for your support.</p> <p>Thank you for supporting the Blakeney Neighbourhood Plan.</p> <p>Comment noted. Yes, a person who has moved away would qualify under local connection priority criteria 2.</p> <p>Comment noted. The Steering Group debated if there would be any benefit in having either a time period prior to moving away and/or having moved back. It was felt this would be counter productive and no time period is set.</p> <p>It was felt more important to create the opportunity for people who have a connection to Blakeney. Using the criteria in order of priority, those who currently live in Blakeney (for any length of time) would have the top priority.</p>

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	Policy 13	<p>Yes. Agree to most Item 4 - Former School Playing Field, Langham Rd Would recommend that this should be designated Strategic as well as Amenity. It has become essential for visitors where the Carnser is unavailable for parking and for really busy days / events.</p> <p>Thereby minimising on-street parking and enabling business dependent on visitors to flourish, thus helping to maintain a thriving local economy.</p>	<p>Comment noted. Although using the definitions in paragraph 6.255 it is still felt that the former School Playing Field should not be listed as 'strategic'.</p> <p>Proposed action:- Comments noted and no changes to the BNHP are proposed.</p>
<p>PS/33 Blakeney Resident</p>		<p>Agree with all 17 Policies. Disagree with none of the Policies. Overall agree with the Neighbourhood Plan.</p>	<p>Thank you for your support.</p> <p>Thank you for supporting the Blakeney Neighbourhood Plan.</p> <p>Proposed action:- Comments noted and no changes to the BNHP are proposed.</p>
<p>PS/34 Blakeney Resident</p>	Policy 6	<p>Agree with all 17 Policies. Disagree with none of the Policies. Overall agree with the Neighbourhood Plan.</p> <p>Yes.</p>	<p>Thank you for your support.</p> <p>Thank you for supporting the Blakeney Neighbourhood Plan.</p> <p>Comment noted. It is important to get the right mix of home size to reflect the needs that are affordable.</p>

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		One-bedroom homes are very inflexible and should be limited in number. Two-bedroom are better even for singles and couples – ref 1.	Proposed action:- Comments noted and no changes to the BNHP are proposed.
PS/35 Blakeney Resident		<p>No indication of 'Agree' or 'Disagree' with any of the Policies.</p> <p>Overall agree with the Neighbourhood Plan.</p> <p>5.21 States, in 2011 site BLOA3 (Harbour Way) was selected to minimise landscape impact. Yet the present NNDC Local Plan preferred site BLOA4/A appears to completely ignore the views expressed in the Blakeney Conservation Area Plan August 2018.</p> <p>Despite it being Draft Local Plan 2016-2036 put forward for consultation, reading section 5.16-5.32 of the BNP, the BNP appears to be required, especially in view of the comments that have been submitted on the NNDC Local Plan website, with regard to this proposed site.</p>	<p>Thank you for your response.</p> <p>Thank you for supporting the Blakeney Neighbourhood Plan.</p> <p>Comment noted. The words are those of North Norfolk District Council (NNDC) and the choice of 'preferred' site is one they are proposing. Additional words are being added to the supporting text to make it clear that this is NNDC's view.</p> <p>Comment noted. We agree that the Blakeney Neighbourhood Plan is necessary and very important to the future of our village and community.</p> <p>Proposed action:- Comments noted and no changes to the BNHP are proposed.</p>
PS/36 Open Spaces Society	Policy 13	<p>We apologise for the delay in responding to the below request for feedback which has been due to a combination of ill-health and pressure of work.</p> <p>Our case officer, Nicola Hodgson, has now reviewed this and was disappointed to see that the plan</p>	Thank you for your response.

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		<p>specifically says that they are not designating any open space as Local Green Space which is a missed opportunity to specify any open spaces they want to protect.</p>	<p>Comment noted. Due to the nature of a number of the Open Spaces identified they would not meet the criteria to seek designation as Local Green Space.</p> <p>Proposed action:- Comments noted and no changes to the BNHP are proposed.</p>

Blakeney Neighbourhood Plan



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