



# Consultation Statement

**September 2022**

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## **1. Introduction**

- 1.1 This consultation statement is prepared in pursuance of Section 15(1)(b) of The Neighbourhood Planning (General) Regulations 2012 (as amended) to accompany the Holt Neighbourhood Plan (HNP) upon submission to the North Norfolk District Council.
- 1.2 The legal basis of this Consultation Statement is provided by Section 15(2) of Part 5 of the 2012 Neighbourhood Planning Regulations (as amended), which requires that a consultation statement should:
- contain details of the persons and bodies who were consulted about the proposed neighbourhood plan.
  - explain how they were consulted.
  - summarise 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 Holt Neighbourhood Plan

## **2. Organisational Structure**

- 2.1 The policies contained in the Holt Neighbourhood Plan are as a result of considerable interaction and consultation with the community and businesses within the parish and engagement with the District Council. Work has involved the original formation of a Steering Group, surveys, public meetings and events, open questions to local community and discussions with community groups over approximately 7 years. Regular reports have been presented to Full Council at Holt Town Council and support has been given at each stage, as required for us to move forward.
- 2.2 In 2019 members of the Holt Neighbourhood Plan Finishing Group were confirmed to take the Plan forward to examination and referendum.
- 2.3 In the latter stages of the HNP process advice and guidance was provided through Locality, the national body set up by the

Government to supply technical aid on Neighbourhood Planning and a consultant was subsequently employed, as required by Locality for us to obtain grant funding to move forward to employ our choice of Planning Consultant. Neil Homer was employed by us to guide us in updating our Neighbourhood Plan and working with an unadopted but emerging LPA Local Plan, as it had reached Reg 19. We needed to update our policies due to circumstances and time loss beyond our control. We used evidence we gathered from our consultations to ensure that we took forward the key features that were still relevant to our community. Views and interactions from this entire process led to the Aspirations and Objectives in the HNP. To ensure that the Policies we prepared for our re-submission in 2022 we followed the key topics brought forward in consultation. This information was used to produce our amended and targeted policies for this submission. All contributions, written and verbal, from the 2018 consultation, were fully discussed in following meetings of the Steering Group with our Consultant, and were responded to accordingly, (See Appendix A). Such information allowed us to check with confidence that we have chosen the most relevant topics upon which to base our new policies (2022).

### 3. The main events in the production of the HNP

3.1 The table that follows is intended to give an overview of the procedure and thereby, the interface between the Steering Group and latterly the Holt Neighbourhood Plan Finishing Group and the community during the production of the HNP.

| Date                          | Action  | Notes   |
|-------------------------------|---|---|
| 2 <sup>nd</sup> December 2013 | NNDC approved the designation of the Holt Neighbourhood Plan  | NNDC publicized the application and carried out the statutory consultation.   |
| 16 <sup>th</sup> October 2014 | Neighbourhood Plan Launch Event and initial public consultation event to ask residents, businesses, and stakeholders their views on Holt and to seek volunteers for the steering group. | All day event targeting different groups of the community. Aim was to seek volunteers to join the Steering Group and capture ideas. |

|                                |   |   |
|--------------------------------|---|---|
| 27 <sup>th</sup> March 2017    | Presentation at the Annual Town Meeting took place on 27 <sup>th</sup> March 2017.  | Many residents were in attendance. Aim of the event was to explain the next stages and share feedback.  |
| 24 <sup>th</sup> June 2017     | Public consultation event was held in the Church Hall.  | This event was structured around several visual displays. Additional volunteers were recruited to help with the HNP and the HNP mission statement and objectives were tested. |
| 26 <sup>th</sup> July 2017     | Policy Development Workshop   | Reviewed the suggested policy areas through an interactive workshop.  |
| 8 <sup>th</sup> September 2017 | Written invitation emailed to consultees.   |   |
| 15 <sup>th</sup> December 2017 | A full-page article in the Holt Chronicle (issue 391) explaining the pre-submission consultation.   | Little direct feedback was received, although residents at the events commented on the content of the articles.   |
| 12 <sup>th</sup> January 2018  | A half page article in the Holt Chronicle (issue 392) reminding residents about the pre-submission consultation.                              |   |
| 19 <sup>th</sup> Jan 2018      | Holt Chamber of Trade and Commerce Members Meeting.   | A presentation on the HNP followed by a Q&A session and hard copies of the response forms were handed out.  |
| 20 <sup>th</sup> January 2018  | Pre submission Reg 19 consultation on Draft HNP, the 6-week statutory consultation 11 <sup>th</sup> January – 23 <sup>rd</sup> February 2017. | 59 responses were received which can be viewed in full at the Appendix A.   |
| 20 <sup>th</sup> January 2018  | Pre-submission community event  | The event was structured around a series of display boards, there was an area set aside   |

|                               |   |   |
|-------------------------------|---|---|
|                               |   | for response forms to be filled in.   |
| 26 <sup>th</sup> January 2018 | A full-page article in the Holt Chronicle (issue393) about the pre-submission consultation and reminding everyone to return their response forms.   |   |
| April 2018 – February 2020    | A series of open Steering Group meetings to review each of the responses received from residents, businesses, and stakeholders.   |   |
| May 2019                      | Neighbourhood Plan Finishing Group was formed.  | After much time had passed due to Covid a smaller group was set up (made up of Cllrs and the Clerk) to focus on updating the HNP.   |
| October 2019                  | Final draft HNP submitted to LPA (NNDC)   | Not accepted. Investigations and remedial work were started by the HNP Finishing Group. COVID then struck, curtailing opportunities to obtain information.  |
| March 2020 – April 2021       | Due to Covid 19 the HNP project was put on hold to allow HTC to focus its efforts on supporting the community and offering help, advice and support.  |   |
| May 2021                      | Locality recommended we have a review and health check (Appendix B) in order to supply the necessary grant funding requested to obtain the services of our selected Neighbourhood Planning Consultant, Neil Homer. We, therefore, complied. | Locality were asked to assist the HNP Finishing Group by assessing what was needed to bring about our choice of the way forward to a successful re-submission.  |
| December 2021                 | Neil Homer, Neighbourhood Planning Consultant, was appointed.   | Neil was appointed to take the suggestions from the Health Check forward and it was decided, due to the changes to planning legislation and the progress of the emerging Local Plan, that a more targeted Neighbourhood Plan would be appropriate. Many of the previous policies were now covered by existing legislation and didn't need to be included in the HNP. Therefore, the plan was edited to make sure it was updated, relevant and that it |

|                            |  |   |
|----------------------------|--|---|
|                            |  | did not repeat National or Local legislation.   |
| January 22-<br>August 22   | A number of meetings were held with the Holt Neighbourhood Plan Finishing Group and the Planning Consultant, where revisions were made to The Plan and necessary updates produced (due to the changes to the NPPF and then an available draft of the NNDC Emerging Plan). NNDC were fully consulted regarding the draft Emerging Local Plan. | The HNP plan was edited to remove duplicated policies.  |
| 13 <sup>th</sup> June 2022 | Agreed at HTC meeting to submit the Holt Neighbourhood Plan to NNDC.   | HTC Full Council supported the motion to send the edited streamlined plan to NNDC for its final submission. |

#### 4. Regulation 14 Pre-Submission Consultation

4.1 The Regulation 14 Pre-Submission Consultation ran for the six-week period 11<sup>th</sup> January - 23<sup>rd</sup> February 2018:

- A paper copy of the Draft HNP and the supporting evidence bundle was available for inspection throughout the consultation at Holt Community Centre, Kerridge Way, Holt.
- A notice in the form of Doc 27 of Annex 1 was displayed upon Holt Town Notice board throughout the period of the consultation
- The Draft HNP, supporting evidence and consultation notice was posted on the Town Council Website (Neighbourhood Plan page), throughout the period of the consultation and on the NNDC website.
- A notice in the form of Doc 28 Annex 1 appeared in the Holt Chronicle along with any articles throughout the period advertising the consultation and reminding everyone to return their forms.
- Social media was used to promote the plan – using posts on Facebook and Twitter
- The Neighbourhood Plan webpage on the Town Council website [holttowncouncil.org](http://holttowncouncil.org) explained the process, key dates, how to comment. The electronic copy of the documents was available online to download from the dedicated web page.
- Printed copies of the pre-submission version of the HNP were

available to view at the Town Council Office and blank Response Forms were available to take away and complete.

- The full list of statutory consultees who were written to in the form of e-mail Document are as follows: -

|                             |  |
|-----------------------------|--|
| <b>Local Authorities</b>    | Norfolk County Council                                   |
|                             | North Norfolk District Council                           |
| <b>Parish Councils</b>      | High Kelling   |
|                             | Hempstead  |
|                             | Letheringsett  |
|                             | Thornage   |
|                             | Field Dalling  |
|                             | Bodham   |
|                             | Cley next- the sea                                       |
|                             | Edgefield  |
|                             | Kelling  |
|                             | Stody and Hunworth                                       |
| <b>Environment</b>          | Home and Communities Agency (HCA)                        |
|                             | Natural England (Consultation Service)                   |
|                             | Natural England (Norfolk and Suffolk Team)               |
|                             | Environment Agency                                       |
| <b>Historic Environment</b> | Historic England (Swindon)                               |
|                             | Historic England (East of England)                       |
| <b>Transport</b>            | Network Rail (Infrastructure)Limited                     |
|                             | Norfolk County Council                                   |
| <b>Coastal</b>              | Marine Management Organisation                           |
| <b>Electricity/Gas</b>      | British Pipeline Agency Limited                          |
|                             | British Pipeline Agency Limited (North Walsham Terminal) |
|                             | Cadent Gas (Gas Distribution)                            |
|                             | EDF Energy   |



|                                  |  |
|----------------------------------|--|
|                                  | EDF Energy (East of England Office)                          |
|                                  | Eon UK   |
|                                  | N Power Renewables   |
|                                  | National Grid (Electricity and Gas Transmission)             |
|                                  | National Grid (Electricity Distribution)                     |
|                                  | National Grid (Transmission Network- Plant Protection)       |
|                                  | UK Power Networks (Potters Bar)                              |
|                                  | UK Power Networks (Ipswich)                                  |
| <b>Electronic Communications</b> | Arqiva   |
|                                  | Atkins OSM (Vodafone Plant Protection)                       |
|                                  | BT Openreach   |
|                                  | Cornerstone Telecommunications Infrastructure Limited (CTIL) |
|                                  | EE   |
|                                  | Mobile Broadband Network Limited (MBNL)                      |
|                                  | Mobile UK  |
|                                  | O2   |
|                                  | Three  |
|                                  | UK Broadband   |
|                                  | Vodafone   |
|                                  | Wireless Infrastructure Group                                |
| <b>Water</b>                     | Anglian Water  |
| <b>Health</b>                    | NHS North Norfolk Clinical Commissioning Group (CCG)         |
| <b>Voluntary Bodies</b>          | The Holt Society   |

## 5. Responses

- 5.1 In total, 59 consultation responses were received by the end of the formal 2018 consultation period, which ended on 23<sup>rd</sup> February 2018. As part of the Response Form consultees were asked whether they agreed (yes or no) with each of the policies, to clearly state their comments or concerns against each policy, what changes or alternative approach should be taken.

The Response Form also requested if there were any omissions from the Draft HNP.

- 5.2 All 59 of the complete Response Forms returned during the consultation have been reproduced in full in Appendix A. The main issues and concerns raised by consultees are summarised below –

| <b>Policy</b>                   | <b>Summary Of Comments</b>   |
|---------------------------------|--|
| Holt 1 - Design Guidance        | <ul style="list-style-type: none"> <li>● Important to maintain the character of Holt.</li> <li>● There should be greater emphasis upon the requirements of the elderly and less able in new housing, providing ease of inclusion of new aids as they become necessary.</li> </ul> <p>Affordable housing should not be identifiable by style or position within housing sites.</p>  |
| Holt 2 - Housing Mix and Tenure | <ul style="list-style-type: none"> <li>● There were some concerns about Housing growth in Holt with some residents not wanting any more houses built. However, there was considerably more concern raised about how unaffordable Holt was becoming and younger generations moving away.</li> <li>● HNP needs to enable us to make sure that all that is possible is done to ensure that the highest proportion of mixed affordable housing is provided in all future housing developments to create a healthier balance in our community moving forward.</li> <li>● <i>“Why are we building 3/4/5bedroom detached houses, when local people do not earn enough to get on housing ladder”.</i></li> </ul> |
| Holt 3 - Green Infrastructure   | <ul style="list-style-type: none"> <li>● This policy was generally supported by everyone.</li> <li>● Lots of comments were received regarding the importance of biodiversity and the protection and maintenance of our public green areas as identified in our NP.</li> <li>● <i>“More green space for public use”.</i></li> </ul>   |

|   |  |
|---|--|
|   |  |
| <p>Holt 4 -<br/>Employment<br/>growth in<br/>Holt</p> | <ul style="list-style-type: none"> <li>● Considerable concern was expressed about the lack of Local employment, particularly for our young people. Holt has become an unbalanced community, and this is not considered to be healthy. Opportunities must be sought/provided, not only for our present young families but also to encourage new young families to move to Holt.</li> <li>● <i>“Especially needed - encouragement of new employment opps”</i></li> <li>● Two <b>Care Homes</b> have started construction in Holt since 2021 with prominent support from HTC and the HNP Finishing Group. These will serve employment and health care – both key topics in consultation</li> </ul>  |
| <p>Holt 5 -<br/>Community<br/>Facilities</p>          | <ul style="list-style-type: none"> <li>● Difficult getting medical apts.</li> <li>● More sporting facilities needed.</li> <li>● Play and exercise facilities - indoor and outdoor - are greatly needed for our children and young people in support of both physical and mental well-being. Many requests came from parents of young children in a specific questionnaire, regarding the use of two plots of land we are taking over for just such use.</li> <li>● Health facilities were mentioned a lot by local residents with concern that they were becoming inaccessible.</li> <li>● <i>“We need more local sports facilities e.g. A gym in the town”</i></li> <li>● <i>“Sports facilities – overdue”.</i><br/>Gladman won their appeal to build on land off Beresford Road. This was a hugely positive result for Holt Primary School as land to build our greatly needed New School is being gifted and we are now on the NCC building programme. More employment and extended Community Hub are both important aims.</li> <li>● <i>“We need a hopper bus to Kelling Hospital for patients to go to the surgery” (Now in place)</i></li> </ul> |

|  |  |
|--|--|
|  | <ul style="list-style-type: none"> <li>● <i>“The promotion of wellbeing and encouragement of healthy lifestyles is reliant on facilities being easily reached and highly dependent on weather conditions.”</i></li> </ul>  |
| Holt 6 - Connectivity in and around Holt | <ul style="list-style-type: none"> <li>● Better connectivity in and around Holt on bicycle.</li> <li>● <i>“Yes, but paths &amp; cycleways must ‘join up’ with accessible parts of Holt.”</i></li> <li>● Footpaths need to be cut more regularly.</li> <li>● More maintenance needed on Footways.</li> <li>● New pathway links to be developed to ensure the safest routes on foot are available to the town centre and other key recreation facilities – e.g. Holt Country Park and Spout Hills</li> </ul> |
| Holt 7 – Open Spaces                     | <ul style="list-style-type: none"> <li>● Welcomed protection of open spaces.</li> <li>● <i>“Spout Hill, Country Park and various walkways need protection – used by the community for leisure, sport etc. Super!”</i></li> <li>● Support for biodiversity was an important theme for many of those who visited our displays</li> <li>● <i>“<u>ALL</u> new developments should provide green infrastructure”.</i></li> </ul>  |

5.3 The Steering Group considered each of the issues and concerns raised through the Pre-submission consultation.

5.4 NNDC responded to the consultation and raised concerns regarding the SEA/HRA process and asked to undertake the exercise themselves. They also wanted to see more consideration given to the emerging local plan, which had progressed from 2019 to date. NNDC asked for more clarity for the wider spatial and strategic planning context. There were some instances where NNDC highlighted duplication in the plan.

5.5 There were a number of references made to traffic and parking during our consultation sessions. In 2019 it was carefully considered by Holt Town Council and agreed that an independent committee would take over complete responsibility - Traffic and Parking in Holt. This is a substantial

and complex problem in Holt and this committee will work closely with NCC, feeding back to Holt Town Council.

## 6. Further Feedback and Changes

- 6.1 Delays due to the Covid 19 pandemic have meant that the HNP needed updating. National policy changed with the NPPF being reviewed and updated in 2021 and progress had been made with the NNDC Emerging Local Plan. As such Cllrs felt it important to review the HNP to ensure it was still relevant and accurate against the updated and emerging policies.
- 6.2 Localities were asked to carry out a Facilitation Report in order to offer the Council guidance on possible next steps.
- 6.3 To make the Holt Neighbourhood Plan distinctive and to be effective in the determination of planning applications many of the policies were reappraised and revised to give the document more of a bespoke feel and local purpose, adding detail to the Development Plan rather than duplicating its generality. The plan reduced the number of policies from 14 to 7 meaning it became more focussed on the town's main priorities.
- 6.4 Text and policies were updated, and mapping was brought up to date and supporting evidence updated where necessary. In particular this led to the concept of the Green Wheel in Holt Policy 6 and reference to the Norfolk Orbital Railway as an aspiration for Holt at the end of the plan.
- 6.5 It was agreed that Policy 1 Design and Character should be modified with Holt specific design principles capturing some of the work undertaken from the recent Holt Conservation Area Appraisal. This new policy is known as Holt 1 - Design and Character.
- 6.6 Policy 2 Dementia Friendly Communities was removed, with aspects incorporated into Holt 2 - Housing Mix and Tenure and related to the Emerging Local Plan Policy HOU8. A new clause was added to encourage proposals for affordable housing that will meet local needs, including first homes. This was added due to the concerns raised about affordable housing in the consultation.
- 6.7 Policy 3 focused on residential care, this was no longer needed as it was covered in Holt 2 - Housing Mix and Tenure.

- 6.8 Policy 4 was known as Affordable Housing and was cut as this was now covered by Holt 2 - Housing Mix and Tenure.
- 6.9 Policy 5 which was Biodiversity has been incorporated in Holt 3 - Green Infrastructure and a new policies map was drafted.
- 6.10 The old Policy 6 Open Space Protection became Holt 7 - Green Open Spaces and tied in with Local Plan policy ENV7.
- 6.11 Policy 7 was Heritage Protection this was now being covered under Holt 1 - Design and Character; the old policy duplicated policies which existed in the NPPF, so it was felt it was not needed as a standalone policy.
- 6.12 Policy 8 was Employment Growth and became Holt 4 with an added clause encouraging new hotel development, thereby incorporating the old Policy 9 which was New Build Tourism and Overnight Business Accommodation.
- 6.13 Policy 10 was Community Facilities which became Holt 5 - Community Facilities.
- 6.14 Policy 11 the Management of Open Space and Policy 12 Broadband and Mobile Connections were both removed as these were covered by the Emerging Local Plan.
- 6.15 Policy 13 Sustainable Transport became Holt 7 - Open Spaces, and the Green Wheel initiative was added as a result of many responses in the consultation referring to safer off-road spaces and reducing the dominance of the car in Holt.
- 6.16 Policy 14 Healthcare Facilities was removed and covered Under Holt 5 - Community Facilities.

## **7. Consultant Support**

- 7.1 Abzag (Shaun Vincent) was appointed by the Town Council to help produce the HNP between 2017 – 2019.
- 7.2 Andrew Seaman was appointed via Locality in May/June 2021 to provide the Council with a Facilitation Report.
- 7.3 Neil Homer was appointed in December 2021 to present date to take the HNP over the finishing line.

## 8. Conclusion

- 8.1 This Consultation Statement document shares the consultation activity that took place as part of developing the HNP.
- 8.2 It provides evidence that in producing the Draft HNP 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 Holt and the Neighbourhood Plan.
- 8.3 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 HNP.
- 8.4 The draft HNP 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.
- 8.5 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.**

# Appendix A

## Pre-submission Consultation Responses



|  |
|--|
| <p>Holt Neighbourhood Development Plan</p> <p>Pre-Submission Consultation Responses<br/>Results and Feedback<br/>Period: 11 January – 23 February 2018</p> |
|--|

| No.         | Name                           | Policy / Theme / Section | Response Received  | Neighbourhood Plan Comment and Action   |
|-------------|--------------------------------|--------------------------|--|---|
| <b>PS/1</b> | Resident Meadow Close Nr25 3JP |                          | Agree with all 14 Policies.<br><br>Disagree with none of the Policies.<br><br>Overall agree with the Neighbourhood Plan and Sustainability Appraisal Report. | Thank you for your support.   |
|             |                                | Policy 4                 | Essential to the survival of Holt to encourage young or working people to the town.  | Your comment are noted and it is recognised that to build a sustainable community in the future that more younger, families and working residents will be needed to create a balance. |
|             |                                | Policy 6                 | We must not loss these important open spaces.  | Comment noted.  |
|             |                                | Policy 10                | A need for an improvement in cultured activities.  | Comment noted.  |
|             |                                | Policy 13                | Sustainable public transport is key to limiting use of cars unnecessarily.   | Comment noted, something has got to happen to break the dependency on cars.   |

| No.  | Name                           | Policy / Theme / Section | Response Received   | Neighbourhood Plan Comment and Action   |
|------|--------------------------------|--------------------------|---|---|
|      |                                | Policy 14                | Yes, but compared to other local areas we are well provided.  | <p>Comment noted, although just because we may be in a better position than other areas we need to make sure Holt residents get the best possible service.</p> <p><b>Proposed action:- Comments noted and no changes are proposed.</b></p>  |
| PS/2 | Resident Peacock Lane NR25 6HA | Policy 8                 | <p>Agree with all 14 Policies.</p> <p>Disagree with none of the Policies.</p> <p>Worrying the number of empty shops seems to be growing. Hope this is not the beginning of the end of Holt as a "destination town".</p> <p>Also where / when is our new supermarket type shop arriving?</p> | <p>Thank you for your support. Your comments are noted.</p> <p>Comment noted and this is why we must do all we can to encourage local employment.</p> <p>Comment noted, the proposals relating to the Aldi supermarket did not proceed.</p> <p><b>Proposed action:- Comments noted and no changes are proposed.</b></p> |
| PS/3 | Resident Neil Avenue           | Policy 1                 | <p>Agree with all 14 Policies.</p> <p>Disagree with none of the Policies.</p> <p>Overall agree with the Neighbourhood Plan and Sustainability Appraisal Report.</p> <p>Trade materials such as flint to be used.</p>  | <p>Thank you for your support. Your comments are noted.</p> <p>Comment noted.</p>   |

| No.                | Name  | Policy / Theme / Section  | Response Received   | Neighbourhood Plan Comment and Action   |
|--------------------|---|---|---|---|
|                    |   | Policy 3<br>Policy 4<br>Policy 8<br>Policy 10<br>Policy 11<br><br>Overall, do you agree with the HNP? | <p><u>Strongly</u> agree</p> <p><u>Strongly</u> agree</p> <p>But I'd not be anxious about <u>any</u> sympathetic development in open country.</p> <p>We need more local sports facilities eg. A gym <u>in</u> the town</p> <p>Would be happy with option (c) too</p><br><p>Yes<br/>                     Care homes must be a priority, we need sheltered housing and nursing homes.</p> | <p>Support noted.</p> <p>Support noted.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted, although the concern is the viability of new management companies and who picks up the responsibility and cost should the management company fail.</p><br><p>Comment noted.</p> <p><b>Proposed action:- Comments noted and no changes are proposed.</b></p> |
| <p><b>PS/4</b></p> | <p>Resident<br/>                     St Andrews<br/>                     Close NR25 6EZ</p> | <p>Overall, do you agree with the HNP ?</p>   | <p>Agree with all 14 Policies.</p> <p>Disagree with none of the Policies.</p> <p>Overall agree with the Neighbourhood Plan and Sustainability Appraisal Report.</p> <p>Restrict 2' holiday homes</p>  | <p>Thank you for your support.</p><br><p>Your comments are noted.</p> <p><b>Proposed action:- Comments noted and no changes are proposed.</b></p>   |

| No.  | Name                      | Policy / Theme / Section  | Response Received   | Neighbourhood Plan Comment and Action  |
|------|---------------------------|---|---|--|
| PS/5 | Resident<br>Pearsons Road | <p>Policy 1</p> <p>Policy 7</p> <p>Policy 8</p> <p>Policy 10</p> <p>Policy 12</p> <p>Overall, do you agree with the HNP ?</p> | <p>Agree with all 14 Policies.</p> <p>Disagree with none of the Policies.</p> <p>Overall agree with the Neighbourhood Plan.</p> <p>But policy 1 should have made reference to non-designated heritage assets too.</p> <p>See 1 above – need to mention non-designated heritage assets.</p> <p>Need to ensure that out of town retail is not encouraged.</p> <p>Especially with regard to increased no. of houses.</p> <p>Especially needed - for encouragement of new employment opps</p> <p>Yes<br/>Please see comments re 'non-designated' heritage assets – although buildings of local interest are mentioned in SA</p> | <p>Thank you for your support. Your comments are noted.</p> <p>Comment noted and will be added to the policy words.</p> <p>Comment noted and will add to the policy words.</p> <p>Comment noted, although it may be appropriate that certain types of retail are located out of town. The second criteria does allow for this where it does not negatively affect the town centre viability.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted and changes will be made.</p> <p><b>Proposed action:- Comments noted and the following changes to the HNP will be made:-</b></p> <p><b>Policy 1: second criteria replace "listed buildings" with " designated and non-designated heritage assets".</b></p> |



| No.  | Name                       | Policy / Theme / Section        | Response Received  | Neighbourhood Plan Comment and Action   |
|------|----------------------------|---------------------------------|--|---|
| PS/8 | Resident Kenwyn Close Holt | Policy 6                        | <p>Agree with Policies 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13 and 14.</p> <p>Disagree with Policy 6.</p> <p>Overall agree with the Neighbourhood Plan and Sustainability Appraisal Report.</p> <p>No open spaces must be lost for any reason. Once lost these spaces would never be replaced.</p>  | <p>Thank you for your support.</p> <p>Support noted.</p> <p>Comments noted.</p> <p><b>Proposed action:- Comments noted and no changes are proposed.</b></p>   |
| PS/9 | Resident Cromer Road       | <p>Policy 2</p> <p>Policy 9</p> | <p>Agree with all 14 Policies.</p> <p>Disagree with none of the Policies.</p> <p>Overall agree with the Neighbourhood Plan and Sustainability Appraisal Report.</p> <p>Perhaps this could be expanded to include other disabilities ie, Blind, hearing loss, mobility.</p> <p>So long as new building is 'in keeping' with the surrounding properties and is landscaped sympathetically.</p> | <p>Thank you for your support. Your comments are noted.</p> <p>Comment noted. The requirements of the other disabilities are well known and, usually, incorporated into new development proposals. The understanding of dementia and how to lessen the impact is relatively new and, therefore, the principles need to be brought to the attention of the developers.</p> <p>Comment noted.</p> |

| No.                 | Name  | Policy / Theme / Section          | Response Received  | Neighbourhood Plan Comment and Action   |
|---------------------|---|-----------------------------------|--|---|
|                     |   | <p>Policy 12</p> <p>Policy 14</p> | <p>Remove, where possible, of overhead phone lines.</p> <p>How will this be achieved and what about library, schools, etc.</p>   | <p>Comment noted. It is beyond the scope of the HNP to remove overhead phone lines.</p> <p>Comment note. The HNP supports the more healthcare facilities to meet the growing needs of our community, it will be for the NHS and private business to bring forward proposals. Norfolk County Council is responsible for the delivery of library services and schools.</p> <p><b>Proposed action:- Comments noted and no changes are proposed.</b></p>      |
| <p><b>PS/10</b></p> | <p>Holt Resident Completed at Consultation Event – no name or address given</p> | <p>Policy 1</p> <p>Policy 4</p>   | <p>Agree with Policies 1, 2, 3, 7 and 10.</p> <p>Part agree with Policies 4, 5, 12, 13 and 14.</p> <p>Disagree with Policies 6, 8, 9 and 11.</p> <p>Overall neither agrees nor disagrees with the Neighbourhood Plan and Sustainability Appraisal Report.</p> <p>Responsibility of decision accepting “what is deemed suitable”</p> <p>Should not be in either political or local commercial hands.</p> <p>Excellent. Why only up to 25%? Is better flexibility required</p> | <p>Thank you for your response. Your comments are noted.</p> <p>The Local Planning Authority, North Norfolk District Council (NNDC), is responsible for the determination of planning applications. This will be done either under delegated powers by a Planning Officer or by the Planning Committee, which is made up from elected members who are political.</p> <p>Comment noted. It should also be noted that not all affordable housing can be</p> |

| No. | Name | Policy / Theme / Section | Response Received  | Neighbourhood Plan Comment and Action   |
|-----|------|--------------------------|--|---|
|     |      |                          |  | <p>allocated to the local community because of North Norfolk District Council's (NNDC) statutory duty to house some people and, therefore, needs new affordable housing to meet these duties. NNDC also needs to make sure that people can move between properties or out of temporary accommodation and provide people with a home.</p> <p>The 'up to' is required and gives the necessary flexibility based on specific identified need the actual number should be based on the identified need from NNDC Housing Register with the 'local connection'. This number will be up to a maximum of 25% (based on the local need). If the identified need number is lower than 25% of the affordable housing then the percentage is reduced to the actual number identified. The remaining affordable housing will be allocated based on NNDC's priority.</p> |
|     |      | Policy 5                 | Especially the provision of path / cycleways into town centre from development     | Comment noted. Policy 13 picks up your about access to the town centre.   |
|     |      | Policy 6                 | Allotment space must not be included in this list.                                 | Comment noted. The Steering Group felt that the allotments should be protected in this way.   |
|     |      | Policy 7                 | As these buildings are fundamental to character / attraction of Holt this is vital | Comment noted.  |
|     |      | Policy 8                 | See no. 9.   | Comment noted, see response below.  |



| No. | Name | Policy / Theme / Section   | Response Received  | Neighbourhood Plan Comment and Action   |
|-----|------|--|--|---|
|     |      | Policy 9   | Sites for tourism / business would seem to be incompatible regarding location.   | Comment noted. The location of sites would have to meet the criteria set out in the policy.   |
|     |      | Policy 11  | Proposal to (c) place management (this would place in jeopardy all spaces listed in question 6) in commercial hands a dereliction of H.T.C. responsibility.  | Comment noted, although it is felt you have misunderstood the context of this policy. All existing arrangements remain unchanged. The policy seeks to ensure future arrangements for new green infrastructure have a defined responsibility and funding to maintain. The preference would be for option (a) – where the Holt Town Council ensures management and is provided with funds to do so – although the decision will be made between the three options by the developer. |
|     |      | Policy 12  | Dependent on the infrastructure necessary  | Comment noted.  |
|     |      | Policy 13  | Far greater reference to long term parking provision   | Comment noted, encouraging long-term parking would continue to support the dependency on cars rather than developing more sustainable transport modes.  |
|     |      | Overall, do you agree with the HNP ?<br>Do you agree with the SA ? | This presentation does not at this stage provide enough developed factual information. Far too much is nebulous and requires far greater opportunity for public discussion and direction. Much of the manner of the presentation and coded vocabulary used is more appropriate to internal rather than client use. | Comment noted and, while the documents have tried to explain any planning terms used, as these are planning documents the vocabulary is appropriate for their use.<br><br><b>Proposed action:- Comments noted and no changes are proposed.</b>  |



| No.          | Name  | Policy / Theme / Section                             | Response Received  | Neighbourhood Plan Comment and Action  |
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|              |   |  |  | by pass beyond the scope of the HNP.<br><br><b>Proposed action:- Comments noted and no changes are proposed.</b>   |
| <b>PS/13</b> | Holt Resident Completed at Consultation Event – no name or address given. | Overall, do you agree with the HNP ?                 | No indication given whether polices or the Neighbourhood Plan and Sustainability Appraisal Report are supported.<br><br>More affordable housing and what about rented property.  | Thank you for your comments, they have been noted.<br><br>Comment noted. Policy 4 will see rented affordable homes available to local people first.<br><b>Proposed action:- Comments noted and no changes are proposed.</b>  |
| <b>PS/14</b> | Holt Resident Completed at Consultation Event – no name or address given. | Policy 5<br><br>Overall, do you agree with the HNP ? | Agree with Policy 5 .<br><br>No indication given whether other polices or the Neighbourhood Plan and Sustainability Appraisal Report are supported.<br><br>Yes to more cycle paths.<br><br>More affordable housing (not sure that this is the neighbourhood plan) rather than 4 beds etc. in Meadow Close and other new build site by new roundabout | Thank you for your response. Your comments are noted.<br><br>Comment noted.<br><br>Comment noted. Policy 1, third criteria requires a mix of types of dwellings,including one and two bedroom, to meetlocal needs.<br><br><b>Proposed action:- Comments noted and no changes are proposed.</b> |
| <b>PS/15</b> | Resident  |  | Agree with Policy 13.  | Thank you for your support. Your comments  |

| No.   | Name                       | Policy / Theme / Section   | Response Received   | Neighbourhood Plan Comment and Action  |
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|       | Cromer Road Holt           | Policy 13  | <p>No indication given whether other policies or the Neighbourhood Plan and Sustainability Appraisal Report are supported.</p> <p>Traffic levels are already a concern. Town centre air quality a worry. Speeding traffic through the town unchecked. Heavy vehicles, esp oversized buses, emit pollutants. 20mph limit might discourage overuse of town centre as a rat run.</p>   | <p>are noted.</p> <p>Comment noted and this is why this policy is about sustainable transport and reducing the dependency on the car.</p> <p><b>Proposed action:- Comments noted and no changes are proposed.</b></p>  |
| PS/16 | Resident Elsdon Close Holt | <p>Policy 1</p> <p>Policy 12</p> <p>Overall, do you agree with the</p> | <p>Agree with Policies 1 and 12.</p> <p>No indication given against all other individual Policies.</p> <p>Overall agree with the Neighbourhood Plan.</p> <p>Basically I agree with a forward looking policy to cope with inevitable expansion of property in a desirable residential area.</p> <p>Important to prepare positive policy regarding drainage and conservation of local valuable amenities.</p> <p>Is current provision for sewage adequate for the proposed additional housing. Particularly the sewers in existence.</p> <p>Yes<br/>The construction of a 2 storey parking facility on the former 'Thaxter's' Old railway station</p> | <p>Thank you for your response. Your comments are noted.</p> <p>Support noted.</p> <p>Comment noted, policy 1 will improve the quality of future development in Holt.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Support noted.<br/>Comment noted.</p> |

| No.          | Name                         | Policy / Theme / Section                        | Response Received  | Neighbourhood Plan Comment and Action   |
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|              |                              | HNP ?   | site would be beneficial.  | <b>Proposed action:- Comments noted and no changes are proposed.</b>  |
| <b>PS/17</b> | Resident Grove Close         |   | <p>No indication given whether polices or the Neighbourhood Plan and Sustainability Appraisal Report are supported.</p> <p>No comments re plan <u>but</u> comments for T.C. Comments FP Clearance – A boards – continue paths accessibility – disability trail and hopper bus.</p> | <p>Thank you for your response. Your comments are noted.</p> <p>Comment noted.</p> <p><b>Proposed action:- Comments noted and no changes are proposed.</b></p>  |
| <b>PS/18</b> | Resident Pearsons Close Nr25 | <p>Policy 1</p> <p>Policy 3</p> <p>Policy 4</p> | <p>Agree with Policies 5, 6, 7, 8, 9, 10, 11, 13 and 14.</p> <p>Disagree with Policies 1, 2, 3, 4 and 12.</p> <p>Fail to see how the new development enhance the town.</p> <p>How about the younger population?</p> <p>25% - meagre.</p>   | <p>Thank you for your response. Your comments are noted.</p> <p>Comment noted.</p> <p>Comment noted. Open spaces and play areas for children. Policy 8 focussed on the creation of local employment</p> <p>Comment noted. The up to 25% will enable North Norfolk District Council (NNDC) to fulfil their housing requirements and use the flexibility within their Allocation Policy to make this happen – as other Councils have across the country when implementing Neighbourhood Plan 'Local Letting' policies.</p> <p>The 'up to' is required and is based on</p> |

| No. | Name | Policy / Theme / Section | Response Received                                      | Neighbourhood Plan Comment and Action  |
|-----|------|--------------------------|--|--|
|     |      |                          |  | <p>specific identified need with the actual percentage being based on the identified need from NNDC Housing Register with the 'local connection'.</p> <p>When a snap shot of the NNDC Housing List was done in August 2017 it identified a need for 76 homes. To achieve this number for people with a local connection based on the current NNDC policy of 45% affordable homes would require an allocation of 676 new dwellings in the emerging Local Plan. This demonstrates that the 25% will be sufficient to meet the identified need.</p> |
|     |      | Policy 5                 | Protect the hedgerows.                                 | Comment noted and a criteria will be added to Policy 1.  |
|     |      | Policy 6                 | Not enough open 'accessible' spaces                    | Comment noted, this is why protection is needed for the open space we have.  |
|     |      | Policy 9                 | Do we need more?                                       | Comment noted. The feeling is Holt needs a 'Premier Inn or Holliday Inn' style hotel, rather than more high-end B&B's, to attract business and more tourists.  |
|     |      | Policy 10                | Long overdue. Very inadequate.                         | Comment noted.   |
|     |      | Policy 11                | Appropriate Steps? Lawyer speak. Doesn't mean a Thing. | Comment noted. Where other communities have had this sort of policy in their neighbourhood plans it has been effective in securing funding for future management.  |
|     |      | Policy 12                | Have to admit not had any problem.                     | Comment noted and it seems hit and miss  |

| No.                 | Name   | Policy / Theme / Section  | Response Received   | Neighbourhood Plan Comment and Action   |
|---------------------|--|---|---|---|
|                     |  | <p>Policy 13</p> <p>Policy 14</p> <p>Overall, do you agree with the HNP ?</p> <p>Do you agree with the SA ?</p> | <p>More buses required.</p> <p>Overdue.</p> <p>Cant actually say as rather broad general proposals with phrases such as 'appropriate steps' could and can mean anything that planners want it to mean.</p> <p>Again the generic phrases and statements could and can mean anything.</p> | <p>depending where you live in Holt.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted. The policies are specific where necessary and also other give a degree of necessary flexibility to enable them to be applied correctly.</p> <p>Comment noted and see earlier response above.</p> <p><b>Proposed action:- Comments noted and the following changes to the HNP will be made:-</b></p> <p><b>Policy 1: Add criteria to policy "Development that damages or results in the loss of hedgerows, ancient trees, or trees of good arboricultural and/or amenity value will not be supported unless justified by a professional tree survey and arboricultural statement. Where removal of a tree(s) of recognised importance can be justified, a replacement(s) of similar amenity value should be planted within the Parish."</b></p> |
| <p><b>PS/19</b></p> | <p>Holt Resident Completed at Consultation Event – no name or address given.</p> |   | <p>Agree with Policies 1, 5, 6, 7, 8, 9, 10, 11, 12, 13 and 14 .</p> <p>Disagree with Policies 2, 3 and 4.</p> <p>Overall unsure whether agree with the</p>   | <p>Thank you for your response. Your comments are noted.</p>  |

| No. | Name | Policy / Theme / Section | Response Received  | Neighbourhood Plan Comment and Action   |
|-----|------|--------------------------|--|---|
|     |      |                          | Neighbourhood Plan.  |   |
|     |      | Policy 2                 | Agree with the Sustainability Appraisal Report.                                | Support noted.  |
|     |      | Policy 3                 | What about attracting a younger age group?                                     | Comment noted.  |
|     |      | Policy 4                 | See above.   | Comment noted   |
|     |      | Policy 4                 | Not enough affordable housing !  | Comment noted. This policy will address the local need for affordable housing and make it available to people with a local connection first.  |
|     |      |                          | Stop 2 <sup>nd</sup> home owners.  | Second home ownership is seen as a growing issue across North Norfolk, Holt currently has just over 10% of dwelling as second homes. At this time this feels a sustainable level but one to watch, therefore, the HNP has not introduced a policy about principle home ownership. |
|     |      | Policy 5                 | Need to stop removing hedgerows and replacing with walls in new developments ! | Comment noted and protection for hedgerows will be added to Policy 1.   |
|     |      | Policy 6                 | We have very few proper open spaces – leave them alone !! We need more !!      | Comment noted, this is why protection is needed for the open space we have.   |
|     |      | Policy 9                 | But do we need more accommodation for tourists ???!                            | Comment noted. The feeling is Holt needs a 'Premier Inn or Holliday Inn' style hotel, rather than more high-end B&B's, to attract business and more tourists.   |
|     |      |                          | More green space for public use.   | Comment noted.  |



| No. | Name | Policy / Theme / Section  | Response Received  | Neighbourhood Plan Comment and Action  |
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|     |      | <p>Policy 10</p> <p>Policy 11</p> <p>Policy 13</p> <p>Policy 14</p> <p>Overall, do you agree with the HNP ?</p> <p>Do you agree with the SA ?</p> | <p>Sports facilities – overdue.</p> <p>Option (b) would be preferable ! Not to Town Council !!</p> <p>More buses to key places.</p> <p>Overdue !!</p> <p>Unsure.</p> <p>There’s lots about protecting the built environment eg. Listed buildings. But what about SSSI Holt Lowes on increased development ?</p> <p>Yes.</p> <p>Policy 5 <u>ALL</u> new developments should provide green infrastructure.</p> | <p>Comment noted. It is felt the Town Council, being made up of Holt residents, would be the most appropriate body and provide local accountability.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted, as a Special Site of Scientific Interest the Holt Lowes have protection within the National Planning Policy Framework and North Norfolk District Council’s planning policies.</p> <p>Comment noted, this will be dependent on the size of each development.</p> <p><b>Proposed action:- Comments noted and the following changes to the HNP will be made:-</b></p> <p><b>Policy 1: Add criteria to policy “Development that damages or results in the loss of hedgerows, ancient trees, or trees of good arboricultural and/or amenity value will not be supported unless justified by a professional tree survey and arboricultural statement. Where removal of a tree(s) of recognised importance can be justified, a replacement(s) of similar amenity value should be planted within the Parish.”</b></p> |





| No.                 | Name                               | Policy / Theme / Section  | Response Received  | Neighbourhood Plan Comment and Action  |
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|                     |                                    |   |  | <p>residents.</p> <p><b>Proposed action:- Comments noted and no changes are proposed.</b></p>  |
| <p><b>PS/21</b></p> | <p>Resident Greenways NR25 6RX</p> | <p>Policy 1</p> <p>Policy 8</p> <p>Policy 9</p> <p>Policy 13</p> <p>Policy 14</p> | <p>Agree with Policies 2, 3, 4, 5, 6, 7, 10, 11, 12, 13 and 14.</p> <p>Disagree with none of the Policies.</p> <p>Unsure about Policies 1, 8 and 9.</p> <p>Overall agree with the Neighbourhood Plan.</p> <p>An explanation of 'tenure blind' would have helped me understand this proposal.</p> <p>If this is policy why have houses been turned into shops in Bull Street ?</p> <p>What is meant by overnight business accommodation ?</p> <p>What provision has been made for pedestrian access to Holt by residents in the new houses being built on the other side of the bypass. At present they will need to bring cars into Holt to do any significant shopping !</p> <p>Why not use the currently underutilised spaces at Kelling Hospital for more doctor / patient consultation !</p> | <p>Thank you for your support. Your comments are noted.</p> <p>Comment noted. An explanation is provided, paragraph 8.24, in the supporting text.</p> <p>Comment noted. This isn't policy yet and will be in the HNP.</p> <p>Comment noted – Hotel.</p> <p>Comment noted. The answer is none and this is why a policy relating to more sustainable transport modes has been included in the HNP to stop the same mistake being made in the future.</p> <p>Comment noted and this is something that could be done if they so choose and with the NHS Trust agreement.</p> |

| No.   | Name                    | Policy / Theme / Section  | Response Received  | Neighbourhood Plan Comment and Action  |
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|       |                         | <p>Overall, do you agree with the HNP ?</p> <p>Do you agree with the SA ?</p> | <p>Yes.<br/>Young people are not going to need houses here if they have not got employment here, but have to travel, eg. to Norwich, with the associated cost in both time and money.</p> <p>Housing and new employment opportunities need to go hand in hand. Often new housing will immediately be bought by 2<sup>nd</sup> home owners.</p> <p>I was interested to note that 85% of residents said they went outside Holt to shop (feedback board). This could well be due to lack of parking facilities - an aging population find it increasingly difficult to carry heavy shopping back home – even if they live in Holt !</p> | <p>Support noted.<br/>Comment noted.</p> <p>Comments noted and hopefully you will agree the balance in the HNP is about right to improve housing design while supportive towards new employment.</p> <p>Comment noted. Some people have said its due to limited choice or price, although your suggestion of parking difficulties is just as likely. An interesting statistic that would require further work to get to the bottom of the reason or reasons why.</p> <p><b>Proposed action:- Comments noted and no changes are proposed.</b></p> |
| PS/22 | Resident Woodrow Avenue | Policy 5  | <p>Agree with Policies 1, 2, 3, 4, 9, 12, 13 and 14.</p> <p>Disagree with Policies 5, 6 and 8.</p> <p>No comment on Policies 7, 10 and 11.</p> <p>We need better transport system as top priority.</p>   | <p>Thank you for your response and your comments are noted.</p> <p>Comment noted. Locally Is given priority, such as the 'hopper bus', although consideration is given through the planning gain and S106 agreements.</p>  |

| No.          | Name                       | Policy / Theme / Section             | Response Received  | Neighbourhood Plan Comment and Action  |
|--------------|----------------------------|--------------------------------------|--|--|
|              |                            | Policy 6                             | We are in danger of overcrowding the town if not planned properly, infrastructure needs a lot spent. | Comments noted.  |
|              |                            | Policy 8                             | Not really ?   | Comment noted.   |
|              |                            | Policy 9                             | We do need employment (see note under Policy 5 above).   | Comment noted.   |
|              |                            | Policy 12                            | We need more infrastructure !!   | Comment noted.   |
|              |                            | Overall, do you agree with the HNP ? | Only if said comments or some are put into place.  | Comment noted.   |
|              |                            | Do you agree with the SA ?           | Don't really know.   | <b>Proposed action:- Comments noted and no changes are proposed.</b>   |
| <b>PS/23</b> | Resident Market Place Holt |                                      | Agree with Policies 1, 2, 3, 5, 6, 7, 8, 9, 10, 11, 12, 13 and 14.                                   | Thank you for your support. Your comments are noted.   |
|              |                            |                                      | Disagree with Policy 4.  |  |
|              |                            |                                      | Overall agree with the Neighbourhood Plan and Sustainability Appraisal Report.                       | Support noted.   |
|              |                            | Policy 4                             | Locals under the Councils housing allocation won't get local housing                                 | Comment noted. This is exactly why policy 4 has been included in the HNP to ensure locals get the opportunity to get affordable housing. |
|              |                            | Policy 12                            | This statement is incorrect, Shirehall has   | Comment noted. The paragraph 12.14 is  |

| No.                 | Name  | Policy / Theme / Section  | Response Received   | Neighbourhood Plan Comment and Action  |
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|                     |   | <p>Overall, do you agree with the HNP ?</p> <p>Do you agree with the SA ?</p> | <p>always had parking</p> <p>Yes.<br/>There needs to be more parking in Holt.</p> <p>Yes.</p>   | <p>correct as the area has changed over time.</p> <p>Support noted.<br/>Comment noted – the question is where ?</p> <p>Support noted.</p> <p><b>Proposed action:- Comments noted and no changes are proposed.</b></p>  |
| <p><b>PS/24</b></p> | <p>Resident<br/>Wansbeck<br/>House<br/>NR25 6BA</p> | <p>Policy 1, 2 ,<br/>3 and 4</p>  | <p>Agree with none of the Policies.</p> <p>Disagree with all 14 Policies.</p> <p>Overall do not agree with the Neighbourhood Plan or the Sustainability Appraisal Report.</p> <p>Don't want any more housing in Holt.</p> | <p>Thank you for your response.</p> <p>Your disagreement is noted.</p> <p>Your disagreement is noted.</p> <p>Comment note. The HNP does not bring more housing. Voting 'no' for the Neighbourhood Plan at the referendum will <b>NOT</b> stop more housing coming to Holt.</p> <p>Landowners have put forward sites around Holt for housing and employment. North Norfolk District Council (NNDC) will decide which, if any, of these sites will be allocated for additional housing.</p> <p>The HNP seeks to improve any future development that may come to Holt for the benefit of existing and future residents.</p> |

| No. | Name | Policy / Theme / Section       | Response Received  | Neighbourhood Plan Comment and Action  |
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|     |      | Policy 5, 6 and 7              | Lip service paid to “green spaces” but you lot seem determined to build houses all over them.  | <p>Comment noted. See comment above – the HNP does not bring extra or new housing to Holt. The potential impact of more housing is of concern to us all.</p> <p>Policy 6 seeks to protect our open spaces for all to continue to enjoy. While policy 7 seeks to preserve our heritage assets.</p>  |
|     |      | Policy 8 and 9                 | Holt would be better for tourists if it was largely pedestrianised.  | <p>Comment note. Your suggestion, receive mixed views from the local community with some support, while just as many people had the opposite view and disagreed.</p> <p>There is considerable merit in also considering a ‘one-way’ system, that would free space for a great deal of on-road parking. This suggestion also received mixed views, therefore, neither idea has been progressed through the HNP.</p> |
|     |      | Policy 10 and 11               | No leisure / culture facilities apparent in Holt. Much better public transport <u>direct</u> to Norwich required. Norwich has some.  | Comment noted.   |
|     |      | Policy 12, 13 and 14           | Lets have lots of pedestrianisation, much better public transport and the long overdue installation of a post-box next to the old Post Office following the closure of that over a year ago. | Comment noted. See response above regarding pedestrianisation. Royal Mail has agreed to a new post box and installation is awaited.  |
|     |      | Overall, do you agree with the | No. Insufficient / no mention of <u>improved</u> public transport and pedestrianisation.   | Disagreement noted. Policy 13 is seeking for a more sustainable approach to future transport needs of Holt   |



| No.                 | Name                                      | Policy / Theme / Section                       | Response Received  | Neighbourhood Plan Comment and Action  |
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|                     |   | <p>HNP ?</p> <p>Do you agree with the SA ?</p> | <p>No.<br/>This P.R. exercise is just trying to get us to accept unwanted new development.</p>   | <p>and reducing the dependency on cars. It seeks public transport improvements and the provision of footpaths and cycleways.</p> <p>Policy 5 wants to see enhance connectivity and better links to existing footpaths and cycleways.</p> <p>Disagreement noted.<br/>Comment noted. The HNP will <b>NOT</b> bring new development – see comments above. The HNP will bring improvements to design, preserve our heritage and protect our open spaces.</p> <p><b>Proposed action:- Comments noted and no changes are proposed.</b></p> |
| <p><b>PS/25</b></p> | <p>Resident<br/>Norwich Road<br/>Holt</p> | <p>Policy 1</p>                                | <p>Agree with Policies 3, 5, 6, 7, 10, 12, 13 and 14.</p> <p>Disagree with Policies 1, 2, 4, 8, 9 and 11.</p> <p>Overall do not agree with the Neighbourhood Plan and Sustainability Appraisal Report.</p> <p>No further development</p> | <p>Thank you for your response. Your comments are noted.</p> <p>Your disagreement is noted.</p> <p>Comment note. The HNP does not bring more housing. Voting 'no' for the Neighbourhood Plan at the referendum will <b>NOT</b> stop more housing coming to Holt.</p> <p>Landowners have put forward sites around Holt for housing and employment. North</p>  |

| No. | Name | Policy / Theme / Section             | Response Received  | Neighbourhood Plan Comment and Action   |
|-----|------|--------------------------------------|--|---|
|     |      | Policy 4                             | No further development   | Norfolk District Council (NNDC) will decide which, if any, of these sites will be allocated for additional housing.<br><br>The HNP seeks to improve any future development that may come to Holt for the benefit of existing and future residents.                    |
|     |      | Policy 9                             | What does this mean? A hotel, a motel. How do you enforce the use? Not 'very' impressed  | Comment note. The HNP does not bring more housing. But should it come we want to see local people given priority and access to affordable housing.<br><br>Comments noted. It could be either and we do not understand why there would be a need to "enforce the use". |
|     |      | Policy 11                            | No further development   | Comment note. The HNP does not bring more housing. Policy 11 wants to make sure that future green infrastructure is managed appropriately and not left for the Holt tax payer to pick up the bill.  |
|     |      | Overall, do you agree with the HNP ? | No.<br>This is not an easy plan to follow. There is enough building with 700 houses on the periphery of Holt – non accessible for low wage earners anyway. The existing road structure into Holt is impossible as it is. NO MORE DEVELOPMENT | Disagreement noted.<br>Comment noted. The HNP will <b>NOT</b> bring new development – see comments above. The HNP will bring improvements to design, preserve our heritage, protect our open spaces and make affordable housing available to local people.            |
|     |      | Do you agree with the SA ?           | No.<br>This plan as worded seems a bureaucratic fudge so the planners can ruin a charming small Town. They have already created a  | Comment noted. The HNP has been written by the community for the community. It will bring benefit to Holt and its residents.  |

| No.   | Name  | Policy / Theme / Section                                   | Response Received   | Neighbourhood Plan Comment and Action   |
|-------|---|--|---|---|
|       |   |  | dormitory area. Bad !   | <p>The policies in the HNP will become a legal requirements and will guide future developers on the views and requirements of any future development in Holt.</p> <p>The HNP will give residents and the Town Council policies that North Norfolk District Council (NNDC) will implement when determining planning applications.</p> <p><b>Proposed action:- Comments noted and no changes are proposed.</b></p>                |
| PS/26 | Resident<br>The Street,<br>Bodham<br>Holt<br>NR25 6AD | <p>Policy 5, 6 and 7</p> <p>Policy 10</p> <p>Policy 13</p> | <p>Agree with Policies 1, 2, 3, 4, 5, 6, 7, 8, 9, 11, 12, 13 and 14.</p> <p>Disagree with Policy 10.</p> <p>Overall agree with the Neighbourhood Plan and Sustainability Appraisal Report.</p> <p>Please consider how to make pedestrian access to Spout Hill area – from Town <u>SAFER</u>. (Crossing?)</p> <p>Holt festival increasingly elitist and expensive.</p> <p>Adult education lacking – travel for miles to find basic cooking class or evening class, language, etc.</p> <p>Develop outer park and ride areas (near surrounding villages)</p> | <p>Thank you for your support. Your comments are noted.</p> <p>Support noted.</p> <p>Comment noted, although it should be noted that there is already a crossing. This will be one of the areas identified for the Community Speed watch.</p> <p>Comment noted</p> <p>Comment noted, we are all keen to see more available in Holt.</p> <p>Comment noted, this has the potential resolve the town centre parking issues and</p> |

| No.          | Name                    | Policy / Theme / Section       | Response Received  | Neighbourhood Plan Comment and Action  |
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|              |                         | Policy 14                      | Very difficult to get a medical appointment quickly (aging population needs more medical support)  | would support this coming forward.<br>Comment noted.<br><b>Proposed action:- Comments noted and no changes are proposed.</b>   |
| <b>PS/27</b> | Resident<br>Cromer Road | Policy 3                       | Agree with all 14 Policies.<br>Disagree with none of the Policies.<br>Overall agree with the Neighbourhood Plan and Sustainability Appraisal Report.<br>I would fully support a residential care home in Holt. At present most elderly people have to move away. | Thank you for your support. Your comments are noted.<br>Support noted.<br>Comment noted.   |
|              |                         | Policy 5                       | Footpath along Norwich Rd to Country Park, for safety, would be excellent.   | Comment noted and this is included, number 2, on the Project List in section 14 of the HNP.  |
|              |                         | Policy 10                      | Once the new school is built, the old Primary School would make a brilliant Arts Centre.   | Comment noted. Norfolk County Council, as owners, may have other aspirations for this site.  |
|              |                         | Policy 13                      | We need a hopper bus to Kelling Hospital for patients to go to the surgery.  | Comment noted, this would reduce the number of people driving to the surgery. This is coming forward as part of the existing planning conditions on existing developments. |
|              |                         | Overall, do you agree with the | Yes.<br>NB. New Proposed primary school should be off <u>Lodge Close</u> not the new development   | Support noted.<br>Comment noted.   |

| No.                 | Name  | Policy / Theme / Section                     | Response Received  | Neighbourhood Plan Comment and Action   |
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|                     |   | <p>HNP</p> <p>Do you agree with the SA ?</p> | <p>at Heath Farm. (Being close to Country Park would be a huge additional asset for school.</p> <p>Very comprehensive – thanks</p> <p>Yes.</p>   | <p>Support noted.</p> <p><b>Proposed action:- Comments noted and no changes are proposed.</b></p>   |
| <p><b>PS/28</b></p> | <p>Resident<br/>Holt Road<br/>Sheringham<br/>NR26 8NB</p> |  | <p>No indication given whether polices or the Neighbourhood Plan and Sustainability Appraisal Report are supported.</p> <p>This is a very detailed, good and thorough document. However, I have a few comments relating to my particular area of expertise, transport planning, that I think would improve it still further and make it more useful.</p> <p>General - Holt is obviously not an island so the Plan needs to reflect the fact that other north Norfolk residents visit it, such as myself from Sheringham. Yet the survey (2.7.2) only included people within Holt. It is always useful in such plans to try to give them wider publicity.</p> | <p>Thank you for your response. Your comments are noted.</p> <p>Thank you for your positive comments.</p> <p>Comment noted. The survey was targeted at residents and businesses in Holt, as it is Holt residents who ultimately get to vote on the HNP.</p> <p>The surrounding Parish Councils have been contracted through the stakeholder engagement. As have the District and County Councils, plus the statutory bodies. All of whom have had the opportunity to comment on the HNP and how it impacts on them.</p> |



| No. | Name | Policy / Theme / Section | Response Received   | Neighbourhood Plan Comment and Action  |
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|     |      |                          | <ul style="list-style-type: none"> <li>• Travel Plans – these are plans drawn up by any organisation that generates a lot of traffic, to try and minimise 'drive alone' car use, and increase, cycling, walking, bus and train use, car sharing and working at home. Some new residential areas have such Plans and councils often secure them when granting planning permission for, say, new supermarkets. Sheringham's Tesco has one. And the government wanted all schools to have them by 2010 to reduce the 'school run'.</li> <li>• Park and Ride – Holt can get far more people into its centre by bus than by car, and its growth, and limited opportunities for more car parking, may mean considering P&amp;R. Potential sites should be considered now especially given that your Plan looks to 2038.</li> <li>• Developers' financial contributions – when securing planning permissions NNDC could secure funding (through planning Conditions and Section 106 agreements) to be put into a, say, 'Local Transport Initiatives' pot. I believe a current major housing scheme in Holt has a requirement to provide some sort of bus service from it.</li> </ul> | <p>Comment noted. Policy 13 requires new development to quantify and mitigated against any negative impact.</p> <p>Comments noted.</p> <p>Comments noted and undertaken as appropriate mitigation for development.</p> |







| No. | Name | Policy / Theme / Section           | Response Received   | Neighbourhood Plan Comment and Action  |
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|     |      | <p>Policy 3</p><br><p>Policy 4</p> | <p>age or dementia suitable properties, which HTC did not seek to have, and from personal experience when I personally worked for a considerable time to bring the facts to HTC, Housing for the Elderly there was no discussion and it was by a unanimous vote immediately deferred consigned to the waste bin. (Disgraceful) Because the HNP is enforced through HTC despite the written statements and intentions, I can see no change. As I have said, if you want something you have to go out and get it - this I was told I could not do because as a Councillor if it had not been agreed by HTC it was not permitted.</p> <p>An alternative report predicts an increase of over 86% across Norfolk suffering from dementia.</p> <p>Yes, agree.<br/>A blanket – will be supported. Why? Due to the age of local residents has an in depth survey been carried out?</p> <p>Very concerned.<br/>Is this cascade definitive and what control will HTC actually hold over this. It leaves it open for all to be residents of North Norfolk. Does not say how long they would have lived in North Norfolk previously to qualify.</p> | <p>giving more thought to the impact of dementia and how, in using design, housing can tackle such an important issue for the good of the whole community.</p> <p>The HNP, once successful at referendum, will have the backing of the Holt community and become a document NNDC will use – as part of the Development Framework – in determining future planning applications.</p> <p>Comment noted. Paragraph 8.16 identifies that this alarming percentage increase for Norfolk was identified in the Norfolk County Council (NCC) Health and Wellbeing Profile July 2012.</p> <p>Comment noted.</p> <p>Comments noted. The cascade is the order of priority for people with a 'local connection' to Holt. The lowest priority, after adjacent parishes, would be a North Norfolk resident.</p> |

| No. | Name | Policy / Theme / Section | Response Received  | Neighbourhood Plan Comment and Action   |
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|     |      |                          | <p>HTC should already be aware - which my report would have identified - of the age requirements in Holt and the Housing / Care that should be provided. These are not included in the cascade. Holt could have been a leader but you have to ride above pettiness to get things done. There are ways to nationally alleviate the NHS problem but it is outside the HNP Box. How many houses / bungalows / dwellings on the large new developments are age friendly? HTC could have guided the requirements on these new estates to be as described.</p> <p>It is interesting to see large cars at a lowest price house at King's Meadow and one ToLet in Arnolds Keys at £895 pcm. How have HTC acted to have the full details? On that site where the expected Affordable level should be 45%, over 3 sites only 10% were required in total.</p> <p>It is also interesting to see that a garage, space for other items such as cycles should be within the curtilage of properties. This excludes external car parking provision.</p> <p>You now have the houses and have been</p> | <p>Comments noted. It was not felt appropriate to have a minimum or maximum age contained in the cascade as all people, with a local connection to Holt and on the NNDC Housing List, are targeted and will hopefully benefit from being able to access affordable housing.</p> <p>Planning permission for these developments was granted many years ago and prior to the HNP being able to influence them.</p> <p>Comments noted. The requirement for 45% affordable houses is set by NNDC in their Core Strategy. Whilst we would all want to see more affordable houses delivered it is possible for a developer to claim viability issues (as defined in the Nation Planning Policy Framework NPPF) and reduce the percentage of affordable houses.</p> <p>The requirement in Policy 1 for garages to be with the houses is a key design feature, make the garage more usable by the homeowner and will also deter the building of 'garage blocks'. Where a garage is provided at least one parking space would be provided in front of that garage. Other parking will be identified and provided within the design of the development, this could be off-road or on-road.</p> <p>Comment noted. The mix of housing types is</p> |





| No. | Name | Policy / Theme / Section | Response Received   | Neighbourhood Plan Comment and Action   |
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|     |      | Policy 9                 | <p>provision for Coaches and Vital Coachparking.</p> <p>It doesn't mention or stress the outstanding opportunity if the Thornage Road Car Park was developed, Toilet facilities which would get people parking when arriving in North Norfolk, a Tourist information Centre and Coach Parking whilst keeping the majority of that traffic out of Holt.</p> <p>Part agree.<br/>There is no other suitable place to put this. Holt needs anything that brings employment.</p> <p>For goodness sake, employment in Holt, Holt being designated a Business Hub. What has actually happened, what significant quantity of jobs have been created. At one end there has been the dormant industrial land off Hempstead Road and despite 30 years of endless protestation - nothing. At the other, the time it took Capri through objection after objection through Councillors, to get off the ground is now sadly closed. As I write, there are at least 14 empty shop properties empty in Holt. Words and aspirations will not change this, it needs actions.</p> <p>It is unusual for a centrally located supermarket to charge for parking, all day. Generally Town Centre Supermarket Car Parks give 3 hours free parking as would</p> | <p>will always be a balancing act with market forces determining the appropriate levels.</p> <p>Comments noted. There are significant gains expected once completed. Whilst planning permission has been granted the owner and developer have not started the work. There is concern that this site could come forward for residential development in the emerging Local Plan.</p> <p>Comment noted.</p> <p>Comments noted. All Norfolk towns are competing to attract new businesses and employment. While some existing businesses are struggling and some have ceased trading others continue to thrive and grow.</p> <p>The HNP strives to create the environment and balance for the community it will always be the decisions taken in the commercial world and market forces that will regulate and control all our aspirations.</p> <p>Comment noted. This is a commercial decision taken by the supermarket to charge without a free period and is there way of ensuring the car park is available for</p> |

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|     |      | Policy 10                | <p>have been required of Aldi. Why is there no call for Budgens Parking to be similarly operated?</p> <p>Part agree.<br/>Have the present and future needs been identified? Is there a definitive list? What proposals are already in place?</p> | <p>people visiting their shop.</p> <p>Comments noted. NNDC has assessed the requirements and will be defining the future needs relating to growth as part of the emerging Local Plan.</p>  |
|     |      | Policy 11                | <p>Do the proposals cover all ages? What would be the effect if the Community Centre did not exist?</p> <p>Part agree.<br/>HTC may not wish to take on the ownership and this should be agreed before Planning Consent is given.</p>             | <p>Comments noted and, yes, future facilities will need to cater for all age groups.</p> <p>Comment noted. The Holt Town Council may not be the option a developer chooses. As part of any planning application the developer will be required to identify how these facilities will be managed and owned.</p> |
|     |      | Policy 12                | <p>Irrelevant.<br/>This is under Government direction at present and surplus to HNP requirement</p>  | <p>Comment noted. Broadband and mobile services are seen as a key requirement for business and vital to sustaining the community.</p>  |
|     |      | Policy 13                | <p>This is all talk.<br/>When the Holt Surgery moved from Jacob's Place to High Kelling transport was to be provided. This never happened. This does not appear to have been realistically investigated.</p>                                     | <p>Comment noted. The development of sustainable transport is important to the future of Holt.</p>   |
|     |      | Policy 14                | <p>Things just do not happen.</p>  | <p>Comments noted.</p>   |

| No. | Name | Policy / Theme / Section | Response Received   | Neighbourhood Plan Comment and Action   |
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|     |      |                          | <p>What action has been taken NOW. What positive results have been achieved. This Policy just accepts applications may happen. It does nothing to actually go out and get the provision needed to meet the requirements. The Core Strategy identifies Holt as a Principle Settlement with a small town centre. as an employment area attracting people from the surrounding area to work in Holt. The Core Strategy seeks development of the town's industrial estate at Hempstead Road and a choice of possible development sites that may be beneficial to the local economy particularly for business park style developments. This has been an aspiration for 30 years and has not happened. Will it happen because it is in a Plan? Why not a Premier Inn, Residential Home, Assisted Living or Convalescent Home - what better than Kelling Hospital. Nothing happens - to make them happen you have to chase them. What about Sanders Coaches?</p> <p>What regard has been given to proposals of the new Core Plan or Government which may contradict the HNP? present</p> | <p>Please note Kelling Hospital is outside of the Holt Neighbourhood Plan. STP the NHS are working on is giving consideration to future requirements,</p> <p>Comments noted. At the time of writing the emerging Local Plan is not available, has not gone out for consultation and, therefore, the content is unknown.</p> <p>The Government has issued a draft of the updated National Planning Policy Framework for consultation and the final version is expected later this year.</p> <p>The HNP has regard for current and existing</p> |



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|     |      | Overall, do you agree with the HNP ? | <p>With a Neighbourhood Plan, S106’s only guarantee 25% of that money to the area in which it was raised, the rest is in the NNDC control. Holt could benefit from S106 money from other places but Holt is never viewed favourably by NNDC – my opinion is that Holt would lose out.</p> <p>No.<br/>The Mission Statement for Holt I personally believe misses the mark.<br/>Holt is a recognised vibrant Visitor Attraction, a historic market town with strong local identity and distinctiveness a centre from which to access all of North Norfolk.</p> <p>In the Objectives, what has been done to actually achieve adequate healthcare, education and other infrastructure to meet the demands of the additional housing under construction. These have always been aspirations and yet there is no evidence - the houses are being built! Where are the local community facilities, schools, open green spaces and parking. Has the Duck Farm Lease been signed, if so for how long and yet yellow lines are</p> | <p>policy but will also be mindful to any changes being proposed either by NNDC or Government.</p> <p>Comment noted. This is not correct. There is confusion between S106 and Community Infrastructure Levy (CIL) – the 25% relates only to CIL. NNDC does not currently have a CIL charging structure, instead NNDC uses S106 Agreements to fund infrastructure requirements. Any S106 Agreement relating to Holt will see all of those funds spent on the specific elements identified in the S106 Agreement. is</p> <p>Comments Noted. A great deal of time and energy went into drafting and testing the Mission Statement and Objectives. As ever, individuals will always have differing views and suggestions on how to improve them yet further.</p> <p>The view received by residents at the community event was positive – the Mission expressed the key elements for Holt’s future and the Objectives focused on what was seen to be important delivery areas.</p> |

| No. | Name | Policy / Theme / Section | Response Received   | Neighbourhood Plan Comment and Action   |
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|     |      | Omissions                | <p>appearing - outside the control of HTC and any HNP. These are not new initiatives they have been on the table constantly. The amount of children of the streets of Holt in the evenings is testament to that.</p> <p>THERE IS NO FACILITY FOR OTHER COMMENT</p> <p>The Executive Summary identifies 14 Policy Points. Each of these points should not need identifying because they are just normal functioning factors that should have been identified in the past, be being acted upon now and if current actions are anything to go by will remain words and not actions. Local voices will be heard. Sadly HTC have a record of no-consultation with the community and even amongst it's members.</p> <p><b>Currently as an example</b> a possible foundation of a Hub including the Tourist Information Centre has all been kept behind closed doors and at any discussion the Community have been excluded. How can the wishes of the people be represented if they are not consulted or informed of the options?</p> <p>It is not possible to designate Yes/No which</p> | <p>Comment noted. The Response Form does make space for general comment, which you have used, and also suggest "...if necessary, please attach additional pages."</p> <p>Comment noted. The Executive Summary identifies the key points of the HNP. The amount of consultation on the HNP has been considerable, both the TownCouncillors and members of the Steering Group.</p> <p>Historically, things you have been involved in may have been different but the fact your response and the responses of so many have been received demonstrates the success of the consultations in developing the HNP.</p> <p>Comment noted. Times have changed and community involvement is strongly supported.</p> <p>Comments noted.</p> |

| No.   | Name                | Policy / Theme / Section | Response Received  | Neighbourhood Plan Comment and Action  |
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|       |                     |                          | <p>will be taken as definitive as is shown where all your Surveys show Strongly Agree or Agree are coupled.</p> <p>Reading things on paper about Holt and the environs which has been interesting but does not get things done. This full HNP dissitation due to length will no doubt be consigned to the Library, Town Office or book Shelves along with the Holt Vision. The - we wills - have always been there and they still remain as we will. It will be interesting to see what results will be achieved.</p> <p>I believe there is a Conflict of Interest in that the Chair is also Chair of the Friends of Holt Hall mentioned in the 14 Project List. Other Conflicts amongst the HNP Committee must inevitably occur.</p> <p>I accept that it is easy to criticise. I cannot see the purpose or definitive effect that the content will have in future decision making, especially Planning, because as we are already seeing NP's in other areas are being over-ridden by Higher Councils. Any of my comments may be made public.</p> | <p>Comments noted. The HNP is a different type of document and, once 'made', the policies within it will be used by NNDC in determining future planning applications.</p> <p>The HNP will shape and influence what happens in and around Holt – giving people with a local connection access to affordable housing.</p> <p>Comments noted. Any conflicts of interests that have arisen in the process of developing the HNP have been recorded in the Steering Group minutes. All members of the Steering Group have been asked to declare any interests and this has appeared on every agenda for the Steering Group.</p> <p>Comments noted. The HNP is a different type of document and, once 'made', the policies within it will be used by NNDC in determining future planning applications.</p> <p><b>Proposed action:- Comments noted and no changes are proposed.</b></p> |
| PS/30 | Resident Lees Yard, |                          | Agree with Policies 3, 4, 5, 6, 8, 9, 10, 12 and 14.   | Thank you for your response. Your comments are noted.  |

| No. | Name          | Policy / Theme / Section | Response Received   | Neighbourhood Plan Comment and Action  |
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|     | Holt NR25 6HS | Policy 1                 | <p>Disagree with Policies 1, 2, 7, 11 and 13</p> <p>Overall do not agree with the Neighbourhood Plan or the Sustainability Appraisal Report.</p> <p>NO. Duplicate Policies are already in place</p> <p>I cannot see where these Policy principles are necessary or differ to what is already in place.</p> <p>North Norfolk District Council is the Planning Authority with appointed officers to oversee and ensure any developer should be delivering high quality design and conforming to 'Building for Life' principles.</p> <p>The preservation and enhancement of the character and appearance of the Holt Conservation Area is also currently under the jurisdiction of the North Norfolk District Council's Conservation &amp; Design Officer.</p> <p>The large-scale housing developments that are currently in the process of being built in Holt have not revealed any major design issues that would have conflicted with a Neighbourhood Plan.</p> <p>Why would any developer not wish to address and conform with each of the 11</p> | <p>Your disagreement is noted.</p> <p>Comment noted. This policy is specific to Holt and Not a duplicate. The criteria give the specific details and requirements, while the use of Building for Life will deliver high quality development design.</p> <p>Comments noted. The officers of North Norfolk District Council (NNDC) in determining planning applications apply the national policies and the district wide policies from the Core Strategy. The HNP will give the officers additional policies to meet the specific needs and uniqueness of Holt.</p> <p>Comment noted. See comment above in giving the NNDC officers specific policies for Holt to preserve both designated and non-designated heritage assets.</p> <p>Comment noted. Any new developments will also be required to meet the policies of the HNP once it has successfully passed the examination and referendum.</p> <p>Comments noted. While we also do not know, we are aware that some developers</p> |

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|-----|------|--------------------------|--|--|
|     |      | Policy 2                 | <p>aspects shown in Policy 1?</p> <p>No.<br/>Holt is already a Dementia friendly community. It is the responsibility of the Planning Authority to ensure that planning applications comply with regulations.</p> <p>The building industry is constantly evolving with a greater understanding of measures to improve individual homes to suit people's lifestyles.</p> <p>The predicted increases in dementia throughout the UK are well documented and not reliant on a Neighbourhood Plan.</p> <p>Any developer wishing to sell individual homes in Norfolk, particularly Holt, should be acutely aware of the housing market which clearly dictates a suitability of design to accord with the high percentage of 'ageing population'.</p> <p>Planning applications should never be "encouraged" because they incorporate the principle of any specific need.</p> | <p>are better than others. Therefore, it does not hurt to be specific and list the requirements for Holt.</p> <p>Comment noted. See comment above, for Policy 1, in giving the NNDC officers to seek development proposals to take account of the principles that will make development better for all and specifically for those who suffer from dementia.</p> <p>Comments noted.</p> <p>Comments noted. Sadly, over the life of the HNP many Holt residents are likely to be impacted by dementia if the predictions are correct. Therefore, this very important issue does need to be addressed in future design.</p> <p>Comments noted.</p> <p>Comment noted. Our intent was to encourage the use of the principles in future development rather than to encourage planning applications. Policy will be reworded to remove the words "Planning applications".</p> |



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|     |      | Policy 5                 | <p>I remain unconvinced that some developments actually benefit from the incorporation of affordable homes and can appreciate the resistance shown by some developers.</p> <p>Secondly, I have always remained sceptical of the Housing Register Lists and the preference criteria that determines the specific need to transfer to Holt.</p> <p>There are known instances where people have been transferred to Holt and the town has clearly failed to meet their expectations and not been instrumental in providing employment opportunities.</p> <p>I strongly support the 25% affordable housing availability for people on the Housing Register under the criteria listed in Policy 4 of the Holt Neighbourhood Plan but remain concerned that the additional 75% of affordable housing will fail to support the job expectations for any young people, place additional pressures on a crippling weak infrastructure and will prove unsuitable to address the needs of others transferred to Holt from outside the North Norfolk District.</p> <p>Yes. But is it just a pipedream?<br/>But I fear any new development, just as those currently under construction, will be too distanced from the town centre to benefit significantly from any footpath and</p> | <p>Comments noted. Policy 1, criteria 5 requires affordable homes to be 'tenure-blind'.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted. It is important that affordable homes are made available to people with a connection to Holt first.</p> <p>Comments noted. It is important that linkages are made to the existing network and especially to the town centre.</p> |

| No. | Name | Policy / Theme / Section | Response Received   | Neighbourhood Plan Comment and Action  |
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|     |      | <p>Policy 6</p>          | <p>cycleway linkage.</p> <p>The promotion of wellbeing and encouragement of healthy lifestyles is reliant on facilities being easily reached and highly dependent on weather conditions.</p> <p>The 'ageing population' is much more reliant on freedom of accessibility by car</p> <p>Yes. But with corrections.<br/>It is incorrect to refer to the George V Playing Field as 'The Peacocks' (this is a housing development off Heather Drive, Woodfield Road, Holt).</p> <p>The play area listed as No. 5 is not behind the Police Station. Item No. 7 should be referred to as 'The Methodist Memorial Garden'.</p> <p>It seems inconceivable that recognized Open Spaces such as Holt Country Park, Little Hills, Spouts Common and The Methodist Memorial Garden are not already classified protected open spaces.</p> <p>I was surprised not to see Holt Lowes, included in the list of important open spaces.</p> | <p>Comments noted.</p> <p>Comment noted. It is important that more sustainable transport modes are encouraged to break the dependency on the car.</p> <p>Comments noted.</p> <p>Comments noted. It is felt that No.5 is listed correctly but the reference to No.7 will be corrected. Table 1</p> <p>Comment noted.</p> <p>Comment noted. Holt Lowes, while important, is already designated as a Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC).</p> |
|     |      | <p>Policy 7</p>          | <p>No. Duplicate Policies are already in place.</p>   | <p>Comment noted. This policy provides</p>   |



| No. | Name | Policy / Theme / Section | Response Received  | Neighbourhood Plan Comment and Action  |
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|     |      | Policy 8                 | <p>There seems little need or necessity to have a Policy in a Neighbourhood Plan duplicating the Heritage Protection afforded by a building registered as 'Listed'.</p> <p>Development proposals for the enhancement and preservation of the setting of a Listed building would be under the jurisdiction of the North Norfolk District Council Conservation &amp; Design Officer.</p> <p>Yes. But with strong reservations. The Policy indicates that the development of 'new build tourism' will not be encouraged or supported. Any measure or opportunity which is instrumental in bringing additional or new employment to Holt should be supported.</p> <p>Should a planning proposal for overnight business accommodation arise for Holt, it should be considered on its merits and not dismissed as inappropriate by a Policy in a Neighbourhood Plan.</p> <p>It is essential that any proposal for a 'Farmers Market' or 'Street Market' to promote local produce (10.17) in Holt town centre should be undertaken with full and detailed consultation with the trading community. The concept has already proved controversial in the past due to the lack of appropriate consultation and discussions with the trading community have not taken place on this subject during the Holt</p> | <p>protection for both designated and non-designated heritage assets.</p> <p>Comment noted. It is NNDC would will apply this policy to the Holt Neighbourhood Area.</p> <p>Comment noted.<br/>The exclusion is for new build tourism and overnight business accommodation (e.g. hotel, motel, etc.....) as these are the focus of policy 9. The wording could be confusing and will be reworded to make clearer.</p> <p>Comment noted and is covered in Policy 9.</p> <p>Comment noted. This is project 6 on the Project List should the community decide to take forward.</p> <p>A consultation event was organised specifically for the 'trading community' on the evening of 19<sup>th</sup> January 2018, which you attended, and the subject of a 'Farmers Market' or 'Street Market' was not raised.</p> |

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|     |      |                          | <p>Neighbourhood Plan planning process.</p> <p>Many traders and residents consider it would be very inappropriate to the town's image and well-being to have 'Farmers Markets' or 'Street Markets'. It is strongly felt that it would have a very negative effect for those already engaged in the sale of local produce in the town centre.</p> <p>The strong resistance expressed by the trading community, and the petition and level of representation made by the residents of Holt, for the planning application (subsequently won on appeal) for two mobile trading barrows on the frontage of Barclays Bank adequately served to illustrate local concern.</p> | <p>Comment noted.</p> <p>Comment noted. As this was raised by residents at the consultation events if they are against having 'Farmers Markets' or 'Street Markets' then it is unlikely the community will take forward the project.</p> |
|     |      | Policy 9                 | <p>Yes.<br/>Providing the construction of overnight tourist and overnight business accommodation is suitable and does not have a detrimental impact in locations within or adjoining existing settlements.</p>   | <p>Comment noted.</p>  |
|     |      | Policy 10                | <p>This sector is not catered for particularly well in Holt (or the surrounding area) and the opportunities for employment would be welcomed.</p> <p>Yes. But there are some extremely serious issues to initially address.</p> <p>The provision of additional facilities should</p>   | <p>Comment noted.</p> <p>Comments noted.</p> <p>Comment noted. The policy incorporates</p>   |

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|     |      |                          | <p>be encouraged, but the implementation of formal and informal spaces in the town centre must not be at the expense of car parking.</p> <p>It has been identified that Holt’s acute lack of car parking facilities, and the continual loss of car parking spaces, has had a serious and very detrimental effect on footfall in the town centre.</p> <p>Car parking usage in Holt is basically divided between four individual needs, each seriously deficient in provision:</p> <ul style="list-style-type: none"> <li>(1) Parking for Residents</li> <li>(2) Parking for Traders/Staff</li> <li>(3) Parking for Customers</li> <li>(4) Parking for Visitors/Tourists.</li> </ul> <p>The dramatic increase in Holt’s population with new edge-of-town residential developments will inevitably impact further on the need to access the town centre by car.</p> <p>Where the UK ‘High Street’ faces decline, there are now a number of vacant shops in Holt. Visitor levels have dramatically decreased and the town has earned a reputation for being ‘impossible to park’.</p> | <p>the provision of additional car parking near the town centre.</p> <p>Comment noted. The dependency on the car is not sustainable and Policy 13 seeks to encourage alternatives. There is no evidence to link parking and footfall.</p> <p>Holt is a very compact and walkable town, which is demonstrated by the fact that it has the highest proportion of people who walk to work in all of Norfolk (source: A Vision for Holt January 2012 and 2011 Census).</p> <p>Comments noted.</p> <p>Suggestions have been made that have split the community views from full pedestrianisation with some sort of park and ride to a one-way system that would enable much of the existing carriageway to be converted to parking.</p> <p>Land at Thornage Road, 2ha, has been allocated as a car park and it has been suggested that a further car park could be included in the allocated site HO9. Both sites are within walking distance of the town centre, although some footpath improvements may be required.</p> |

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|     |      | Policy 11                | <p>The promise of additional parking illustrated in the Holt Neighbourhood Plan has not come to fruition.</p> <p>The Aldi Supermarket with a 3-hour free car parking agreement has failed to materialize and the site remains undeveloped. The car park proposal for Cley Road and the Thornage Road car park have not commenced. The removal of car parking spaces through 'yellow-lining' is an ongoing concern to the trading community and the problems associated with indiscriminate parking in residential areas is increasingly problematic.</p> <p>The growing local community needs, provision of additional local facilities and town's full potential cannot be fully realized whilst the issue of car parking remains unresolved.</p> <p>The number of car parking spaces per square meterage of commercial towncentre floor space remains at the second poorest level in the North Norfolk District.</p> <p>The Neighbourhood Plan should support every car parking initiative <b>regardless of location</b> and I would suggest the wording "<i>near the town centre</i>" should be removed from Policy 10.</p> <p>No.</p> | <p>Comment noted. See comments above.</p> <p>Comment noted. Proposals for the Aldi Supermarket were not taken forward.</p> <p>Comment noted. See earlier comments relating to a range of possible solutions (pedestrianisation, park and ride and one-way system) and the location of two new car parks.</p> <p>Comments noted. The suggestions to resolve these issues will require considerable investment but without the investment it is not going to get better.</p> <p>Comment noted. Support for additional car parking, regardless of location, would not be appropriate.</p> <p>Comment noted.</p> |

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|     |      | <p>Policy 12</p> <p>Policy 13</p> | <p>I would not support Holt Town Council taking on ownership of any additional areas of Open Spaces, or to be responsible for their future management or upkeep.</p> <p>District Council's/Local Authorities are already devolving financial responsibilities for community services to Town &amp; Parish Council's and the transfer of cost ultimately impacts on the communities through increased precepts.</p> <p>A developer should be wholly responsible for all ongoing management arrangements where Open Spaces have been provided.</p> <p>The level of profit generated by any housing development should be sufficient for a developer to form a private management arrangement with a viable, proven and sustainable business case.</p> <p>Yes.<br/>It seems a rather odd policy to include in a Neighbourhood Plan and obvious that a community would wish for enhanced services should they become available.</p> <p>No. Duplication of policies are already in place.</p> | <p>Comments noted. This is the reality people taking control of their community and ensuring services funded by those using them – local residents.</p> <p>Comment noted. This is one of the options available to any developer and a choice they make. The concern and issue is that we are seeing more and more 'management companies' being set up and then going bust a few years later. This leaves the district town council to pick up the pieces and all the management costs.</p> <p>Comment noted. You would have thought so.</p> <p>Comment noted.</p> <p>Comment noted. The Core Strategy Policy CT5 only required a degree of assessment</p> |

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|     |      | <p>Policy 14</p><br><br><br><p>Overall, do you agree with the HNP ?</p> | <p>The sustainability, impact, measures and design for any new development are already being totally addressed by the North Norfolk District Council Planning Authority in full consultation with the Norfolk County Council Highway authority.</p> <p>Yes.<br/>The local medical facilities are already stretched to capacity and do not currently meet the growing needs of the local community.</p> <p>Were insufficient Section 106 arrangements made in the past?</p> <p>No.<br/>The Holt Neighbourhood Plan contains a repetitive duplication of policies, strategies, guides, reports, statements, objectives and summaries that can be found already featuring in previous documents produced by Norfolk County Council, North Norfolk District Council and Holt Town Council.</p> <p>The result of this totally unnecessary duplication of content has resulted in the production of a heavyweight 82-page Plan which could have easily been condensed into a smaller, more factually concise document.</p> <p>It is an appalling waste of public funding, particularly when other Neighbourhood</p> | <p>and no mitigation measures. In addition, the assessment does not take account of the cumulative effect with other developments in Holt and surrounding parishes.</p> <p>Comments noted.</p><br><p>Disagreement noted.<br/>The HNP has policies that relate to and will be implemented in the Holt Neighbourhood Area. The HNP will improve the standard of design and guide future development.</p> <p>Norfolk County Council (NCC) and North Norfolk District Council (NNDC) have policies that relate to the county and district that are not specifically tailored for Holt and its residents.</p> <p>Comments noted. The HNP has created considerable community engagement and</p> |

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|     |      | Omissions                | <p>Plans have been produced which convey virtually identical wording and layouts.</p> <p>I remain totally unconvinced of the need and relevance of a Neighbourhood Plan, and remain deeply concerned that it has been prepared with miniscule public interest and involvement, particularly in connection with the trading community.</p> <p>I can attest to the lack of communication in having my business property listed amongst the project list in Section 14 of the Holt Neighbourhood Plan where I have never entered into any discussion or been approached by any member of the Steering Group.</p> <p>The aims and objectives of The Localism Act 2011 giving the right for local people to draw up a Neighbourhood Plan and greater ownership of plans and policies that affect their area have not been fully met.</p> <p>There are continual references made to involvement from 'stakeholders', but these are not named or listed within the Holt Neighbourhood Plan.</p> <p>The Steering Group Membership does not represent a cross-section of the community.</p> | <p>interest in planning the future of Holt.</p> <p>Comment noted. The HNP gives the community of Holt the ability to influence and effect future development that may come to Holt. A specific community event was put on for the trading community ensuring the trading community had the opportunity to discuss at length the HNP and its content.</p> <p>Comment noted.<br/>As you know, project 10 was carried forward from The Holt Vision document with other projects listed that are yet to be implemented - this was not raised by you at any of the community events that you attended.</p> <p>Comments noted. You will see from comments received by other members of the community that not everyone shares your view.</p> <p>Comment noted. The list of stakeholders is contained within the Consultation Statement.</p> <p>Comment noted. The Steering Group has been made up from volunteers and included a member of the trading community.</p> |

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|     |      | <p>Do you agree with the SA ?</p> | <p>I cannot find any reference to a 'Sustainability Appraisal' in the Holt Neighbourhood Plan in order to make comment. The question being asked reflects the confusing nature of the documentation being produced.</p> <p>The suggested method of downloading consultation documents and to submit electronic responses alienates members of the community who do not have access to a computer.</p> <p>Nothing has ever been made easy to enable feedback on the Holt Neighbourhood Plan, a perfect illustration being with the publication of the Holt Neighbourhood Plan questionnaires. These were specifically designed for residents, totally eliminating any feedback from the trading community. The 'lack of interest' from the traders of Holt was severely criticised by the Steering Group who failed to appreciate that the majority of those with business interests in Holt do not live in the town.</p> <p>As can be seen by my submission, the Yes/No response makes it extremely difficult to complete the form objectively or effectively.</p> <p>To be informed <i>"This is your last chance to influence the Neighbourhood Plan"</i> (Holt</p> | <p>Comment noted. The Sustainability Appraisal is a separate document that was made available for consultation alongside the HNP. Paragraph 2.7.8 of the HNP explains how the Sustainability Appraisal was constructed.</p> <p>Comment noted. Other options were made available with hard copies available in public buildings and at the consultation events.</p> <p>Comments noted. Opportunity has been created a number of times for the trading community – with consultation events being specifically targeted at this group.</p> <p>An event to support the questionnaires on 16<sup>th</sup> October 2014 again was tailored with a "Business Breakfast" aimed at the trading community starting at 8am.</p> <p>Comment noted and thank you for taking the time to complete your response.</p> <p>Comment noted. This was just one form of advertising and your comment confirms that</p> |



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|     |      |                          | <p>Chronicle Issue 392 Page 9) resulted with a 3-hour community event on a Saturday morning in January.</p> <p>This was certainly not conducive in attracting a high level of attendance, and serves adequately in illustrating my concern at the lack of public consultation in its preparation.</p> <p>It is my wish that the views expressed throughout this submission are circulated to all members of the Holt Neighbourhood Plan Steering Group including the consultant from Abzag Ltd.</p> <p>It is my wish that Holt Town Councillors who are not members of the Steering Group are also provided with copies.</p> <p>I have no objection to my submission being made publicly available or for it to be submitted in its entirety with documentation to North Norfolk District Council and the independent examiner.</p> | <p>it was seen. You have failed to mention the consultation event organised specifically for the 'trading community' on the Friday evening, which you attended.</p> <p>Comment noted. The community event was well supported with residents from all parts of Holt attending, asking questions and completing response forms. There has been a great deal of public engagement and consultation in the drafting and reviewing of the HNP.</p> <p>Comments noted. As with all responses the Steering Group has reviewed and considered all the comments. The Steering Group's views and actions relating to the comments has been recorded in this document and the necessary amendments made to the HNP.</p> <p>Comment noted and your response has been shared.</p> <p>Comment noted. Thank you for confirming. Your submission will be publicly available, with all other responses, in this document.</p> <p>This document also forms one of the suite of documents that will be submitted to NNDC and given to the Examiner when conducting the independent examination of the HNP.</p> |

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|                     |                                |  |  | <p><b>Proposed action:- Comments noted and the following changes to the HNP will be made:-</b></p> <p><b>Policy 2: Reword policy text with "Development proposals should, where possible, and will be encouraged to incorporating the principles of dementia friendly communities ....."</b></p> <p><b>Table 1: Insert the wording " The Methodist..." to No.7.</b></p>   |
| <p><b>PS/31</b></p> | <p>Resident Holt. NR25 6AL</p> | <p>Policy 5</p> <p>Policy 9</p> <p>Overall</p> | <p>Agree with Policies all policies and disagree with done. Agree with the Sustainability Appraisal.</p> <p>I particularly support linkages with footpaths and cycleways.</p> <p>Overnight Business Accommodation is not defined or appear in the glossary.</p> <p>It is excellent that Holt has invested the time, money and expertise to produce a Neighbourhood Plan.</p> <p>If possible it would have been helpful to include a mechanism for monitoring and limiting the number of second home owners in proportion to full time residents. Possibly through the electoral roll or rates.</p> <p>If promoting Holt Hall as a center for excellence could there also be a footpath</p> | <p>Thank you for your support. Your comments are noted.</p> <p>Comment noted.</p> <p>Comment noted, basically a hotel or something similar.</p> <p>Comment noted. The HNP will make a big difference to Holt.</p> <p>Comments noted. The Steering Group has taken the decision not to tackle this particular issue, it is not easy and may have a detrimental impact on the local housing market.</p> <p>Comment noted. If progressed as a project then footpath connectivity would have to</p> |

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|       |   |                          | <p>through Holt Hall to facilitate access to footpaths to the north of Holt Hall.</p> <p>I would be helpful if the HNP was given to a subeditor who could help with plain English. At the moment it is inclined toward using “planning” jargon, acronyms are not always spelt out, and sentence structure is often long and convoluted.</p>   | <p>be considered.</p> <p>Comments noted. The use of “planning” jargon has and acronyms have been avoided as much as possible, but the HNP is a planning document. Where “planning” jargon has and acronyms have been used been an explanation has been given or it is contained in the Glossary.</p> <p><b>Proposed action:- Comments noted and no changes are proposed.</b></p> |
| PS/32 | National Grid<br>Amec Foster<br>Wheeler |                          | <p>National Grid has appointed Amec Foster Wheeler 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 Planconsultation.</p> <p><b>About National Grid</b><br/>National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gasleaves the transmission system and enters the distribution networks at high pressure. It isthen transported through a number of reducing pressure tiers until it is finally delivered to our customers. National Grid</p> | <p>Thank you for your response and your comments are noted.</p>  |

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|     |      |                          | <p>own four of the UK’s gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.</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 our assets.</p> <p><b>Specific Comments</b><br/>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, and also National Grid Gas Distribution’s Intermediate and High Pressure apparatus.</p> <p>National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</p> <p><b>Key resources / contacts</b><br/>National Grid has provided information in relation to electricity and transmission assets via the following internet link: <a href="http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/">http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/</a></p> | <p>Comments noted and thank you for confirming no apparatus within the HNP Neighbourhood Area.</p> |

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|     |      |                          | <p>The electricity distribution operator in North Norfolk Council is UK Power Networks. Information regarding the transmission and distribution network can be found at: <a href="http://www.energynetworks.org.uk">www.energynetworks.org.uk</a></p> <p>Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure.</p> <p>We would be grateful if you could add our details shown below to your consultation database:</p> <p>Hannah Lorna Bevins<br/>Consultant Town Planner</p> <p>Spencer Jefferies<br/>Development Liaison Officer,</p> <p>I hope the above information is useful. If you require any further information please do</p> |                                       |

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|              |                                      |                          | not hesitate to contact me.  | <b>Proposed action:- Comments noted and no changes.</b>  |
| <b>PS/33</b> | Planning Admin Team<br>Sport England |                          | <p>Thank you for consulting Sport England on the above neighbourhood plan.</p> <p>Government planning policy, within the <b>National Planning Policy Framework</b> (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 73 and 74. It is also important to be aware of Sport England’s statutory consultee role in <b>protecting playing fields</b> and the presumption against the loss of playing field land. Sport England’s playing fields policy is</p> | <p>Thank you for your response and your comments are noted.</p> <p>Comments noted and Sport England will be consulted on any proposals changing the use of playing fields by North Norfolk District Council.</p> |

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|     |      |                          | <p>set out in our Planning Policy Statement: 'A Sporting Future for the Playing Fields of England'.</p> <p><a href="http://www.sportengland.org/playingfieldspolicy">http://www.sportengland.org/playingfieldspolicy</a></p> <p>Sport England provides guidance on <b>developing planning policy</b> for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.</p> <p><a href="http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/">http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</a></p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 74 of the NPPF, this takes the form of <b>assessments of need and strategies for indoor and outdoor sports facilities</b>. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local</p> |                                       |

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|     |      |                          | <p>investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England’s guidance on assessing needs may help with such work.<br/> <a href="http://www.sportengland.org/planningtoolsandguidance">http://www.sportengland.org/planningtoolsandguidance</a></p> <p>If <b>new or improved sports facilities</b> are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.<br/> <a href="http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/">http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</a></p> <p>Any <b>new housing</b> developments will generate additional demand for sport. If existing sports facilities do not have the</p> | <p>Comments noted and thank you for highlighting the design guidance.</p> |



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|     |      |                          | <p>capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government’s NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how <b>any new development</b>, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England’s Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a</p> |                                       |

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|                     |   |                          | <p>neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8:<br/> <a href="https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities">https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</a></p> <p>PPG Health and wellbeing section:<br/> <a href="https://www.gov.uk/guidance/health-and-wellbeing">https://www.gov.uk/guidance/health-and-wellbeing</a></p> <p>Sport England’s Active Design Guidance:<br/> <a href="https://www.sportengland.org/activedesign">https://www.sportengland.org/activedesign</a></p> <p><i>(Please note: this response relates to Sport England’s planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)</i></p> <p>If you need any further advice, please do not hesitate to contact Sport England using the contact details</p> | <p><b>Proposed action:- Comments noted and no changes are proposed.</b></p> |
| <p><b>PS/34</b></p> | <p>Resident<br/>Valley Lane<br/>Holt<br/>NR25 6SF</p> |                          | <p>Did not agree or disagree with any Policies.</p> <p>As requested, please find attached my response &amp; questions (in red) relating to the above document. I have referred each point to the relevant section for your ease of</p>  | <p>Thank you for your response.</p>   |

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|     |      |                          | <p>reference.</p> <p>Parking on Thornage road is mentioned (see 6.4.6 and 10.8). Has this been fully agreed ? When is this scheduled to occur ?</p> <p>I'm a bit confused about house plan numbers. In 6.2.3 a figure of 650-700 is mentioned from 2001. This section also mentions 250-300 on a new greenfield site –where is this ?</p> <p>Sections 6.4.2 to 6.4.8 relate to current developments -- 100 west of Woodfield Road, 200 at Heath Farm, 153 off Cromer Road (Kings Reach) . Are there additional planned developments and if so, where are these to go?</p> <p>Obviously 700 extra houses (6,2,3) need more schools. What's the plan for this ?</p> <p>In section 10.5, it's mentioned that there exists a 'low shop vacancy rate'. I do <b>not</b> agree with this – there seems to be a worryingly high number of vacant shops.</p> <p>Section 10.9 relates to the proposed Aldi – scheduled for 2016. It's disappointing that</p> | <p>Comment noted. The site has been allocated in the Site Allocations as CP10, which outlines the requirements for the site. The owner and/or developer has not set a date for this development to occur yet.</p> <p>Comment noted. Paragraph 6.2.3. details Policy SS9 of the Core Strategy, with paragraphs 6.4.2. to 6.4.5. providing the allocated site details.</p> <p>Comments noted. The HNP does not seek to allocate additional development sites. Landowners and developers are bringing forward proposals and planning applications all the time. Details of these can be found on the North Norfolk District Council website under planning, <a href="https://www.north-norfolk.gov.uk">https://www.north-norfolk.gov.uk</a> or on the Holt Town Council website at this link, <a href="http://www.holttowncouncil.org/council-info/agendas-meetings/">http://www.holttowncouncil.org/council-info/agendas-meetings/</a></p> <p>Comment noted. A number of sites have been suggested but nothing finalised.</p> <p>Comment noted. This is relative when compared to other market town centres. Vacancies are always worrying and detract from the beauty of the town centre.</p> <p>Comment noted. It was disappointing that</p> |

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|       |                        |                          | <p>this site remains undeveloped. Now that the extra houses are being built, this makes the site even more attractive. What are you doing to actively attract a suitable tenant ?</p> <p>Obviously I would be very happy to discuss these points. I look forward to your answers and appreciate you adding my comments/questions to your submissions.</p>  | <p>the Aldi proposals fell through but it is still hoped an alternative provider can be found.</p> <p>Comment noted. Your points will be publicly available, with all other responses, in this document.</p> <p><b>Proposed action:- Comments noted and no changes are proposed.</b></p>               |
| PS/35 | Norfolk County Council | Mission Statement        | <p><b>Norfolk County Council Comments on the: Holt Neighbourhood Plan (Reg 14) 13th February 2017</b></p> <p><b>1. Preface</b></p> <p>1.1. The officer-level comments below are made on a without prejudice basis and the County Council reserves the right to make further comments on 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><b>2. General Comments</b></p> <p>2.1. The County Council supports the Mission Statement and Objectives set out in the Plan</p> | <p>Thank you for your response and the comments of Norfolk County Council (NCC) are noted.</p> <p>Comment noted.</p> <p>Comment noted and thank you for recognising the communities work in drafting the HNP.</p> <p>Comment noted and NCC's support. The Town Council is keen to work with NCC to</p> |

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|     |      | and Objectives           | <p>(pages 18 - 19). In particular the County Council supports objective 2 and 5.</p> <p><b>3. Infrastructure Delivery</b></p> <p>3.1. The County Council supports the inclusion of the reference to new developments being expected to contribute towards improving infrastructure through s106 and other agreements (page 60, 65 and 70).</p> <p>3.2. The neighbourhood plan will need to consider the following;</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• It would therefore be helpful if the emerging Neighbourhood Plan could refer to the installation of Sprinklers in new development.</li> </ul> <p>The neighbourhood plan should therefore contain policies referencing the delivery of the above infrastructure and services.</p> <p>3.3. Should you have any queries with the above comments please call Naomi Chamberlain (Trainee Planner) on 01603 638422 or email <a href="mailto:naomi.chamberlain@norfolk.gov.uk">naomi.chamberlain@norfolk.gov.uk</a>.</p> <p><b>4. Environment</b></p> | <p>see improvements to infrastructure and services.</p> <p>Comment noted.</p> <p>Comment noted. In recognition of NCC's request to refer to the installation of sprinklers this will be included in the supporting text for the Design and Character theme.</p> <p>Sadly, it is not possible to have a specific policy for the installation of sprinklers as this could be seen as being overly onerous on a development as it is not policy for any other area of Norfolk or UK.</p> |

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|     |      | Policy 1                 | <p>4.1. The Green Infrastructure team previously made substantial comments for the scoping report, of which some have been included in this Draft Neighbourhood Plan. However, it is important that the plan acknowledges the Special Area of Conservation (SAC) designation that Holt Lowes has as well as the SSSI designation, in line with the hierarchical guidance within the NPPF.</p> <p>It is encouraged to reference to the extensive existing Public Rights of Way network and opportunities for improvement and enhancements along these routes. It is noted that Spouts Common (page 48 and 62) is mentioned, which may be a locally recognised name, but it should be acknowledged that this is registered common land under the name 'Spout Hills and Little Hills' and therefore, reference should be given to the registered land name.</p> <p>4.2. Should you have any queries with the above comments please call David White (Senior Green Infrastructure Officer) on 01603 222058 or email <a href="mailto:david.white.etd@norfolk.gov.uk">david.white.etd@norfolk.gov.uk</a>.</p> <p><b>5. Lead Flood Authority</b></p> <p>5.1. Holt neighbourhood plan, does not include flood risks from surface water flood, or set a policy for surface water drainage for new developments. Therefore, it is advised that ideally the plan would seek to</p> | <p>Comment noted. Paragraph 6.2.3. does make reference to Holt Lowes as a Special Area of Conservation (SAC). Further reference will be added to the text in paragraph 9.8.</p> <p>Comment noted.</p> <p>Comment noted. Holt is not identified as having a high risk of flooding. Although any new development has the potential to create an increase risk of flooding, especially from surface water run-off. Your</p> |

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|     |      |                          | <p>contribute towards strategic multi-agency efforts to reduce the risk of flooding from all sources in the Holt area and would promote a range of assessment and mitigation measures that will ensure that any future development (or redevelopment) will have a neutral or positive impact on flooding.</p> <p><b>5.2. SUGGESTED POLICY:<br/>FLOODING/DRAINAGE</b></p> <p>The Plan requires that any future development (or redevelopment) proposals show there is no increased risk of flooding from an existing flood source and mitigation measures are implemented to address surface water arising within the development site.</p> <p>Any new development or significant alteration to an existing building within the Wroxham area should be accompanied by an appropriate assessment which givesadequate and appropriate consideration toall sources of flooding and proposed surface water drainage. Any application made to a local planning authority will be required to demonstrate that it would:</p> <ul style="list-style-type: none"> <li>• Not increase the flood risk to the site or wider area from fluvial, surface water, groundwater, sewers or artificial sources.</li> <li>• Have a neutral or positive impact on surface water drainage. Proposalsmust demonstrate engagement with</li> </ul> | <p>suggestion will be added to Policy 1 to reduce the risk of flooding. Will be added to</p> <p>Comment noted. The HNP does not make any such requirement. It is noted that your response references "Wroxham" and it is believed it is the Wroxham Neighbourhood Plan you are making the suggested text change to.</p> |

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|     |      |                          | <p>relevant agencies and seek to incorporate appropriate mitigation measures manage flood risk and to reduce surface water run-off to the development and wider area such as:</p> <ul style="list-style-type: none"> <li>• Inclusion of appropriate measures to address any identified risk of flooding (in the following order or priority: assess, avoid, manage and mitigate flood risk).</li> <li>• Where appropriate undertake sequential and /or exception tests.</li> <li>• Locate only compatible development in areas at risk of flooding, considering the proposed vulnerability of land use.</li> <li>• Inclusion of appropriate allowances for climate change</li> <li>• Inclusion of Sustainable Drainage proposals (SuDS) with an appropriate discharge location.</li> <li>• Priority use of source control SuDS such as permeable surfaces, rainwater harvesting and storage or green roofs and walls. Other SuDS components which convey or store surface water can also be considered.</li> </ul> |                                       |



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|     |      | Policy 13                | <ul style="list-style-type: none"> <li>To mitigate against the creation of additional impermeable surfaces, attenuation of greenfield (or for redevelopment sites as close to greenfield as possible) surface water runoff rates and runoff volumes within the development site boundary.</li> </ul> <p>Provide clear maintenance and management proposals of structures within the development, including SuDS elements, riparian ownership of ordinary watercourses or culverts, and their associated funding mechanisms.</p> <p>5.3. More information can be found on the LLFA website - <a href="https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management">https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management</a>.</p> <p>5.4. Should you have any queries with the above comments please email Helen Underwood (Flood Risk Officer) at <a href="mailto:llfa@norfolk.gov.uk">llfa@norfolk.gov.uk</a>.</p> <p><b>6. Transport</b></p> <p>6.1. The Policy 13 (page 63) sets out thresholds where development will be expected to quantify its travel impacts and this is set at 11 dwellings (or more) or any commercial proposal. The thresholds in Policy 13 are below those that have been identified in previous national guidance which, although withdrawn, is a useful basis</p> | <p>Comment noted and thank you forreferencing further guidance.</p> <p>Comment noted.</p> <p>Comments noted. The level and detail of the assessment is expected to be appropriate to scale of impact and the negative effects associated with the proposals.</p> |

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|     |      |                          | <p>for determining when assessments are required. Those thresholds are over 50 dwellings and at the smallest scale over 250sqm for certain commercial development. Therefore, although not necessarily an issue for the Highway Authority it may be that the aspirations of Policy 13 for traffic movement information and evidence may not always be met by planning proposals.</p> <p>6.2. Should you have any queries with the above comments please call RichardDoleman (Principal Infrastructure and Economic Growth Planner) on 01603 223263or email <a href="mailto:richard.doleman@norfolk.gov.uk">richard.doleman@norfolk.gov.uk</a>.</p> | <p>As guidelines have been removed it is not unreasonable for the HNP to introduce its requirements to ensure traffic and its associated issues are considered and, where necessary, appropriated mitigation measured implemented. The level of 11 dwellings and all commercial proposals is seen as proportionate and a point of possible significance impact on Holt.</p> <p><b>Proposed action:- Comments noted and the following changes to the HNP will be made:-</b></p> <p><b>POLICY1: Add the following criteria "Proposals for development (both new and significant alteration to an existing building) that are likely to significantly increase the risk of flooding (including fluvial, surface water, groundwater, sewerage or artificial sources) will not be supported."</b></p> <p><b>Design and Character theme: Insert a paragraph of text to say, "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."</b></p> <p><b>Paragraph 9.8: Add "Holt Lowes is also designated as a Special Area of Conservation (SAC)."</b></p> |

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| PS/36 | Resident<br>The Street,<br>Briningham,<br>Norfolk.<br>NR25 2PY | <p>Policy 1</p> <p>Policy 2</p> <p>Policy 3</p> <p>Policy 4</p> | <p>Agree with Policies 2, 3, 5, 6, 8, 9, 10, 11, 12 and 14.</p> <p>Disagree with Policies 1, 4, 7 and 13.</p> <p>Overall do not agree with the Neighbourhood Plan or the Sustainability Appraisal Report.</p> <p>NO</p> <p>YES</p> <p>YES</p> <p>NO. I do not believe any existing or new build affordable housing should be built for or occupied by anyone not from Holt. Even so, how can we enforce a policy of local housing for local people.</p> | <p>Thank you for your support. Your comments are noted.</p> <p>Disagreement noted.</p> <p>Comment noted. While we support your sentiment it is necessary to be realistic about the wider needs and the requirement for North Norfolk District Council (NNDC) to find homes for people in priority need.</p> <p>The 'need' identified for people with a connection to Holt by NNDC through the Housing List will be satisfied through 25% being allocation to people with the local connection.</p> <p>NNDC will be able to enact the flexibility inbuilt in the Housing Allocation Policy while still being able find homes for people from the district that are seen to be in priority need.</p> |

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|     |      |                          | <p>I particularly disagree with the criteria (VI) Residents of North Norfolk District, which implies people from across North Norfolk could be rehoused within the town. What makes Holt so loved by locals and tourists alike is the sense of it having a strong sense of identity formed by the people who live and work there. It is a close-knit, small community. The populace of Holt should not be unnecessarily expanded by people from outside the town; other residents of North Norfolk parishes should be housed locally.</p> <p>Even if preference for housing local people was to be laid out as a policy, how could this reasonably be enforced without it being considered discriminatory?</p> | <p>Comment noted. The criteria is an order of priority and will make available much needed affordable homes to local people.</p> <p>The last criteria is to complete the order should the available affordable homes not be taken up by people with a connection to Holt then NNDC will be avail to allocate using their priority list, as it is not always possible for other residents of North Norfolk parishes in need to be housed locally.</p> <p>Comment noted. This will be enforced by NNDC, as the Housing Authority, and Government have issued guidance to ensure it is not seen as discriminatory or in conflict with any ones human rights.</p> <p>The guidance specifically deals with prioritising local connection and states Housing authorities have the ability to take account of any local connection between the applicant and their district when determining relative priorities between households who are on the waiting list (s.166A(5)). For these purposes, local connection is defined by reference to s.199of the 1996 Act.</p> <p>Housing authorities should consider whether, in the light of local circumstances, there is a need to take advantage of this flexibility, in addition to applying a residency</p> |

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|     |      | <p>Policy 5</p> <p>Policy 6</p> <p>Policy 7</p> | <p>YES</p> <p>YES</p> <p>NO. Making sure any development in/around the town centre is in-keeping with the built environment is very important.</p> <p>This document does not however reference <b>archaeology</b> (buried structures or features) within the town or on its periphery. The proposed housing developments have the potential to impact greatly on any known/unknown archaeological sites. These areas should be assessed, evaluated and excavated in line with the National Planning Policy Framework (NPPF). NPPF sets out the Government’s planning policies.</p> <p>Paragraph 128 states that local planning authorities, when determining applications, should require the applicant to describe the significance of any affected heritage assets. This should be sufficient so as to understand</p> | <p>requirement as part of their qualification criteria.</p> <p>As defined by s.199 of the 1996 Act. A person has a local connection with the district of a housing authority if he has a connection because of normal residence there (either current or previous) of his own choice, employment there, family connections or special circumstances.</p> <p>Comment noted.</p> <p>Comment noted. It was felt that the general policies of the National Planning Policy Framework (NPPF) and NNDC district wide policies seek to sufficiently preserve the archaeology of Holt without the need for a more specific policy in the HNP.</p> |



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|     |      |                          | <p>has been evidenced by recorded find spots and designated and non-designated heritage assets. Any ground-breaking works on areas, which have not been subject to intrusive modern development pose a risk of destroying archaeological sites. Before this happens, archaeological desk-based assessments should be carried out as a first measure. Where this potential for buried remains, evaluation trenches should be excavated to establish the presence or absence of archaeology.</p> <p>Archaeology can often be overlooked in the planning process until it is too late. It does however contribute to our sense of place for existing and future residents; teaching us where we came from and adding a feeling of importance/identity to new builds. The findings of any archaeological investigations will in turn be of immense importance in their own right and to local people. To risk losing them would be very short-sighted indeed.</p> | <p>usually the starting point, if that assessment identifies potential then test trenches would be required.</p> <p>Comment noted. NNDC, as the Local Planning Authority, works hard to ensure heritage assets, including archaeological relics, are not lost for future generations.</p> |
|     |      | Policy 8                 | YES. Again, any development for places of employment in the countryside should consider the archaeological potential of these areas.  | Comment noted. See earlier comments.  |
|     |      | Policy 9                 | YES. Look after existing businesses.  | Comment noted.  |
|     |      | Policy 10                | YES. A huge problem within the town is the decreasing number of on- and off-street <b>free car parking spaces</b> . This puts people off  | Comment noted. The need for car parking is a difficult issue to resolve without causing other problems.   |

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|     |      | <p>Policy 11</p> <p>Policy 12</p> <p>Policy 13</p> | <p>visiting the town to shop, tourists and locals alike. More car parking spaces should be allocated in the town and car parks developed on the periphery (e.g. Graham Chapman's proposed car park on Thornage Road).</p> <p>Additional car parking places would massively improve visitor numbers to the town and boost the local economy, employment numbers and keep shops occupied. The positive implications for more car parking are phenomenal.</p> <p>YES</p> <p>YES</p> <p>NO. To some extent this policy touches on important points. The impact on traffic (resulting from an increase in housing/residents) could be alleviated by creating alternative routes of access into the town centre from these new places of residence, in the form of cycle paths.</p> <p>No more parking should taken away from the town. Easy access to the town centre is best achieved by retaining existing car parking places, not taking them away.</p> <p>I do not however think that current layout or use of roads in the town should be altered.</p> | <p>Land at Thornage Road, 2ha, has been allocated as a car park and it has been suggested that a further car park could be included in the allocated site HO9. Both sites are within walking distance of the town centre, although some footpath improvements may be required.</p> <p>Comments noted.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted. As a community we must look to enhance more sustainable transport modes.</p> <p>Comment noted. Some residents who responded had a different view, it was felt that the existing parking should be reviewed to see if it is the most effective use of the limited spaces available.</p> <p>Comment noted. Car parking has caused a great deal of interest and differing</p> |



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|     |      | <p>Policy 14</p> <p>Overall, do you agree with the HNP ?</p> | <p>The current system is effective. Any changes to traffic management in the town centre have the potential to stifle pedestrian and vehicle movement around the Holt, cutting off areas of town from footfall and trade.</p> <p>YES</p> <p>NO. The town council needs to do more to support business in the town. Local, independents shops are what make Holt the destination it is. These range from the greengrocers, butchers and bakers, which serve the town and outlying villages to other tradespeople and shops which serve both residents and the tourist trade. They keep the town alive and vibrant.</p> <p>Putting in place major changes to the infrastructure of the town, increasing the population unnecessarily and not safeguarding the towns character have the</p> | <p>suggestions that have split the community views from full pedestrianisation with some sort of park and ride or a one-way system that would enable much of the existing carriageway to be converted to parking.</p> <p>Disagreement noted. Much effort and work has been undertaken to incorporate a positive approach to support local business within the HNP, but it should be noted that it is about land usage policies and, therefore, limited in the policies that can be included.</p> <p>The HNP is very positive about Holt – The Mission Statement recognises Holt as a “historic market town,” and “with a vibrant town centre.” Seeking to “Harnessing its growth potential, whilst retaining a strong local identity and distinctiveness”.</p> <p>The Objectives of the HNP focus on what residents have said is important to preserve or improve.</p> <p>The HNP does not allocate additional sites for residential or commercial use. Instead it seeks to play a strong role in influencing what may come in the future.</p> <p>Comments noted and we hope you made these comments in respect of the emerging Local Plan, as that may bring about the change you describe if left unchecked.</p> |

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|              |                        | Do you agree with the SA ?                       | <p>potential to cause detriment to what is in essence what sets Holt apart. Being a small, characterful town surrounded on most sides by green fields sets it apart from other places in Norfolk. Do we really want another Fakenham, drab, dreary, full of empty shops and lacking in investment?</p> <p>Before we start thinking about changing the town, let us think about what makes it work, what makes it attractive. How can we best enhance the positive aspects of Holt?</p> <p>No.</p> | <p>Comment noted. This is why the HNP was undertaken and has taken its time to carefully develop policies that will make a real difference to the future of Holt and its residents.</p> <p>Disagreement noted.</p> <p><b>Proposed action:- Comments noted and no changes are proposed.</b></p> |
| <b>PS/37</b> | Norfolk Wildlife Trust | <p>Policy 5</p> <p>Policy 6</p> <p>Policy 11</p> | <p>Agree with Policies 5, 6 and 11.</p> <p>Disagree with none of the Policies.</p> <p>Yes.<br/>Support but suggest add "and designated sites of biodiversity interest" after "with existing open spaces..."</p> <p>Yes.</p> <p>Yes.<br/>See additional page for comments on omissions from the accompanying text (additional comments are )..</p>   | <p>Thank you for your support. Your comments are noted.</p> <p>Comment noted and the policy will be reworded as suggested.</p>   |

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|     |      | <p>Policy 5, 6 and 11</p> <p>Omissions</p> | <p>Thank you for consulting Norfolk Wildlife Trust on the Holt Neighbourhood Development Plan. On the basis of the information provided within the plan, we have the following comments to make. We support Policy 5 on Biodiversity, Policy 6 on Open Space and Policy 11 on Management of Open Space and have indicated this on the response form, along with a suggested amendment to Policy 5. We have made no comment with regard to non-biodiversity policies</p> <p>We also wish to make the following additional comments with regard to the text that accompanies the plan. Holt Country Park and Spout Hills are both designated as County Wildlife Sites, along with the old surveyor's allotment at Gravelpit Lane and a number of privately owned woodlands in the parish. It would be good to make a reference to CWS in paragraphs 9.6 and 9.9 which describe Holt Country Park and Spout Hills, and/or to describe CWS in a separate paragraph.</p> <p>County Wildlife Sites (CWS) are described in the Glossary as being of County importance for biodiversity but not statutorily protected. In our view, the glossary should also make clear that CWS are protected by policies in the North Norfolk Local Plan. See Policies SS4 and EN 9 in adopted North Norfolk Core Strategy Incorporating Development</p> | <p>Comments noted.</p> <p>Comments noted. Reference to the CWS will be added to the supporting text.</p> <p>Comment noted and the Glossary will be updated as suggested.</p> |

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|                     |  |                          | <p>Management Policies</p> <p>In our view it would also be helpful to include a map showing boundaries of designated biodiversity sites, including SSSIs and CWS. Map layers are available from Norfolk Biodiversity Information Service. Citations for CWS can also be obtained from NBIS</p>   | <p>Comment noted. Map of Glaven Valley to be used.</p> <p><b>Proposed action:- Comments noted and the following changes to the HNP will be made:-</b></p> <p><b>Policy 5: reword to add "and designated sites of biodiversity interest" after "with existing open spaces..."</b></p> <p><b>9.6 and 9.9: County Wildlife Sites (CWS) will be added to the supporting text.</b></p> <p><b>Glossary: Update CWS definition to highlight that "CWS are protected by policies in the North Norfolk Local Plan - Policies SS4 and EN 9".</b></p> |
| <p><b>PS/38</b></p> | <p>Natural England<br/>Hombeam House<br/>Crew Business<br/>Park<br/>Crewe<br/>Cheshire<br/>CW1 6GJ</p> |                          | <p>Natural England does not wish to make comment on the suitability of the proposed plan area or the proposed neighbourhood planning body.</p> <p>However we would like to take this opportunity to provide you with information sources the neighbourhood planning body may wish to use in developing the plan, and to highlight some of the potential environmental risks and opportunities that</p> | <p>Thank you for your response. Your comments are noted.</p>   |

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|     |      |                          | <p>neighbourhood plans may present. We have set this out in the annex to this letter.</p> <p><u>Natural England’s role</u><br/>                     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. The local planning authority will be aware and should advise the neighbourhood planning body when Natural England should be consulted further on the neighbourhood plan.</p> <p><u>Planning policy for the natural environment</u></p> <p>Neighbourhood plans and orders present significant opportunities, but also potential risks, for the natural environment. Proposals should be in line with the National Planning Policy Framework. The key principles are set out in paragraph 109:</p> <p>The planning system should contribute to and enhance the natural and local environment by:</p> <ul style="list-style-type: none"> <li>• protecting and enhancing valued landscapes, geological conservation interests and soils;</li> <li>• recognising the wider benefits of ecosystem services;</li> <li>• minimising impacts on biodiversity and providing net gains in biodiversity</li> </ul> |                                       |

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|     |      |                          | <p>where possible, contributing to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;</p> <p>The neighbourhood planning body should also consider the natural environment policies in the area’s Local Plan. The neighbourhood plan or order should be consistent with these, and the neighbourhood planning body may decide that the emerging Neighbourhood Plan should provide more detail as to how some of these policies apply or are interpreted locally.</p> <p>The attached annex sets out sources of environmental information and some natural environment issues you may wish to consider as the neighbourhood plan or order is developed.</p> <p><b>Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities</b></p> <p><b>Natural environment information sources</b><br/>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:<br/><b>Agricultural Land Classification, Ancient</b></p> |                                       |

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|     |      |                          | <p><b>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).</b> Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available here.</p> <p><b>Priority habitats</b> are those habitats of particular importance for nature conservation, and the list of them can be found here. Most of these will be mapped either as <b>Sites of Special Scientific Interest</b>, on the Magic website or as <b>Local Wildlife Sites</b>. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.</p> <p><b>National Character Areas</b> (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.</p> <p>There may also be a local <b>landscape character assessment</b> covering your area.</p> |                                       |

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|     |      |                          | <p>This is a tool to help understand the character and local distinctiveness 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 <b>National Park</b> or <b>Area of Outstanding Natural Beauty</b> (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 <b>soil types</b> and <b>Agricultural Land Classification</b> is available (under 'landscape') on the Magic website and also from the LandIS website, which contains more information aboutobtaining soil data.</p> <p><b>Natural environment issues to consider</b></p> <p>The National Planning Policy Framework sets out national planning policy on protectingand enhancing the natural environment. Planning Practice Guidance sets out supporting guidance.</p> |                                       |



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|     |      |                          | <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><br/>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><br/>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</p> |                                       |

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|     |      |                          | <p>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><br/>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 understand the impact of particular developments on protected species.</p> <p><u>Best and Most Versatile Agricultural Land</u><br/>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 112. For more information, see our publication Agricultural Land Classification: protecting the best and most versatile agricultural land.</p> <p><b>Improving your natural environment</b><br/>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</p> |                                       |

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|     |      |                          | <p>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"> <li>• Providing a new footpath through the new development to link into existing rights of way.</li> <li>• Restoring a neglected hedgerow.</li> <li>• Creating a new pond as an attractive feature on the site.</li> <li>• Planting trees characteristic to the local area to make a positive contribution to the local landscape.</li> <li>• Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.</li> <li>• Incorporating swift boxes or bat boxes into the design of new buildings.</li> <li>• Think about how lighting can be best managed to encourage wildlife.</li> <li>• Adding a green roof to new buildings.</li> </ul> <p>You may also want to consider enhancing your local area in other ways, for example by:</p> <ul style="list-style-type: none"> <li>• Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.</li> <li>• Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.</li> </ul> |                                       |

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|                     |  |                          | <ul style="list-style-type: none"> <li>• Identifying green areas of particular importance for special protection through Local Green Space designation (see Planning Practice Guidance on this).</li> <li>• Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).</li> <li>• Planting additional street trees.</li> <li>• 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.</li> <li>• Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).</li> </ul> | <p><b>Proposed action:- Comments noted and no changes are proposed.</b></p>  |
| <p><b>PS/39</b></p> | <p>Resident<br/>Lees Yard, Holt<br/>NR25 6HS</p> | <p>Policy 1</p>          | <p>Agree with Policies 3, 4, 5, 6, 8, 9, 10, 12 and 14.</p> <p>Disagree with Policies 1, 2, 7, 11 and 13.</p> <p>Overall do not agree with the Neighbourhood Plan or the Sustainability Appraisal Report.</p> <p>No<br/>We pay our rates for everything to be</p>   | <p>Thank you for your response. Your comments are noted.</p> <p>Your disagreement is noted.</p> <p>Comment noted. This policy is specific to</p> |

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|     |      |                          | determined by NNDC planning and conservation authorities. Why duplicate?   | Holt and Not a duplicate. The criteria give the specific details and requirements, while the use of Building for Life will deliver high quality development design.   |
|     |      | Policy 2                 | No<br>As far as I'm aware there's no such thing as a dementia friendly new build. People suffering with dementia should not be moved out of their familiar environments. | Planning officers of North Norfolk District Council (NNDC) will continue to determine planning applications, the HNP will give the officers additional policies to meet these specific needs and uniqueness of Holt.<br><br>Comments noted. It is unlikely that someone with dementia would move to a new home and away from a familiar area. Through the use of the principles in future development it should enable a resident of that development, who unfortunately gets dementia, to remain longer in their own home and community. |
|     |      | Policy 3                 | Yes<br>Residential care/retirement homes are essential for Holt  | Comment noted.  |
|     |      | Policy 4                 | Yes<br>Providing affordable homes are built for Holt people to enable them to work in the town.  | Comment noted. Homes are where people live, criteria (iii) in identifying the local connection recognises people who work in Holt – giving them access to affordable homes.   |
|     |      | Policy 5                 | Yes<br>Nobody can be forced to walk or cycle into the town regardless of providing facilities  | Comment noted. Holt has one of the highest percentage of people who walk to work according to the 2011 Census and we  |

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|     |      | Policy 6                 | Yes<br>Shouldn't all open space be protected?   | should encouraged this as much as possible by creating the right environment and facilities.<br><br>Comment noted, those listed are seen by residents as the most important.  |
|     |      | Policy 7                 | No<br>We pay our rates for everything to be determined by NNDC planning and conservation authorities. Why duplicate ?   | Comment noted. Planning officers of North Norfolk District Council (NNDC) will continue to determine planning applications, the HNP will give the officers additional policies to meet the specific needs and uniqueness of Holt. |
|     |      | Policy 8                 | Yes<br>BUT: The competition of a Farmers Market or Street Market would impact strongly on existing traders, who employ local people.  | Comment noted. Hopefully this would be complementary rather than competition to existing retail offering.   |
|     |      | Policy 9                 | Yes<br>Any measure to improve tourism will assist the viability of Holt and provide parking for guests staying at the Hotel who could access the town on foot.                | Comment noted.  |
|     |      | Policy 10                | Yes<br>Nothing can be done until adequate parking for the town is properly addressed.   | Comment noted.  |
|     |      | Policy 11                | No<br>A developer makes enough money from the sale of property to enable them to maintain their development themselves. No financial responsibility for a private development | Comment noted. If the management company option is selected by a developer it is likely they will apply an annual 'management charge' to the new residents.   |

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|     |      | Policy 12                            | <p>should ever pass to a local authority.</p> <p>Yes<br/>But was it necessary to have a policy in a Neighbourhood Plan?</p>  | <p>It isn't the responsibility for the development, instead it is the public areas, green open space, etc...</p> <p>Comment noted. Yes if we want to make it happen.</p>  |
|     |      | Policy 13                            | <p>No<br/>We pay our rates for everything to be determined by NNDC planning and conservation authorities. Why duplicate ?</p>  | <p>Comment noted. Planning officers of North Norfolk District Council (NNDC) will continue to determine planning applications, the HNP will give the officers additional policies to meet the specific needs and uniqueness of Holt.</p>  |
|     |      | Policy 14                            | <p>Yes<br/>But ultimately this is a decision for the NHS and Government to make.</p>   | <p>Comment noted.</p>   |
|     |      | Overall, do you agree with the HNP ? | <p>No<br/>This is just another instance of complete and utter waste of public money employing non-local specialist consultants to prepare worthless plans and policies that never ever come to fruition. (ie first the Holt Vision and now the Neighbourhood Plan)</p> | <p>Disagreement noted.<br/>Comment noted. Many residents of Holt have taken a differing view to you regarding the value the HNP will bring. UnlikeThe Holt Vision the HNP is a legal planning document and, once successful at referendum, will be used by NNDC in determining planning applications.</p> |
|     |      | Do you agree with the SA ?           | <p>No<br/>Why proceed with a totally wasteful 146 page document when a conclusion is reached on page 30 that theNeighbourhood Plan is unlikely to have any significant effect and will not require a</p>   | <p>Comment noted. The document is large and we appreciate that a planningdocument is not exactly riveting reading – thank you for taking the time to review – it is one of the support documents to the HNP</p>   |

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|       |   |  | Strategic Environmental Assessment?   | <p>and the large number of pages contained in the appendixes are necessary to demonstrate how the HNP has been tested using Framework, previous agreed with the Statutory Bodies, and the impacts it is likely to have.</p> <p><b>Proposed action:- Comments noted and no changes are proposed.</b></p> |
| PS/40 | Chair<br>Holt Dementia Friendly<br>Community Steering Group | <p>Policy 2</p> <p>Policy 3</p> <p>Policy 8</p> <p>Policy 14</p> | <p>Agree with Policies 2, 3, 8 and 14.</p> <p>No comment on Policies 1,4, 5, 6, 7, 9, 10. 11, 12 and 13.</p> <p>Yes</p> <p>Yes</p> <p>Given the lack of care home capacity the steering group would like to see HTC taking a more proactive role in attracting potential residential home developers – not just supporting applications. Additionally taking a role in specifying the deliverable such that it meets the needs of the community.</p> <p>Yes</p> <p>With regard to policy 3 and given Holts demographics care for the elderly should offer significant opportunity for employment growth.</p> <p>Yes</p> | <p>Thank you for your response. Your comments are noted.</p> <p>Comment noted although beyond the scope of what the HNP can do.</p> <p>Comment noted.</p> <p><b>Proposed action:- Comments noted and no</b></p>   |



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|              |  |                          |  | <b>changes are proposed.</b>   |
| <b>PS/41</b> | Historic Places Advisor, East of England, Historic England |                          | <p>Thank you for consulting Historic England about your Pre-Submission Neighbourhood Plan. As the Government’s adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. We are therefore pleased to have the opportunity to comment on your neighbourhood plan at this stage.</p> <p>Holt has an interesting and remarkable history, particularly with regard to its large scale reconstruction following the fire in the Georgian period, and the development Gresham School. Your neighbourhood area encompasses a correspondingly rich historic environment, which is reflected by the presence of a number of designated heritage assets. This includes 118 listed buildings of which two, the Old Rectory and the Parish Church of St Andrew, are of very high significance and listed Grade II*. The Holt Town Centre, Letheringsett and Glaven Valley Conservation Areas are also within your neighbourhood area.</p> <p>The government’s National Planning Practice Guidance is clear that Neighbourhood Plans need to include enough information about local heritage to guide local authority planning decisions,</p> | <p>Thank you for your response and your comments are noted.</p> <p>Comment noted. Holt is rich with heritage both designated and non-designated while being surround by environmental areas of significance.</p> |

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|     |      | Policy 1                 | <p>and to put broader strategic heritage policies from the local authority’s local plan into action but at a <i>neighbourhood</i> scale. This should include enough information about local non-designated heritage assets, including sites of archaeological interest, locally listed buildings, or identified areas of historic landscape character.</p> <p>We welcome this comprehensive and detailed Neighbourhood Plan, and are pleased to see that the historic environment of Holt is considered throughout. We have the following comments to make:</p> <p>On p19, we suggest that objective 1 is reworded slightly to read “...rural, built and historic environment, character and ethos...”. This wording, which is in line with national policy, reflects the holistic nature of the historic environment and will encompass all types of heritage assets, including those above and below ground.</p> <p>We also suggest that the second paragraph in the Core Aim 3 supporting information text box is reworded to “New developments will be required to respect the setting of Holt’s designated and non-designated heritage assets, and preserve or enhance the character and appearance of the town”.</p> <p>We welcome Policy 1 Design and Character, including the stated requirement to protect the setting of listed buildings. We</p> | <p>Comment noted. The objective has been reworded as suggested as the objective still retains the original intent.</p> <p>Comment noted and the way the Core Aim 3 should be implemented in Holt will be updated as suggested.</p> <p>Comment noted. The term heritage assets will replace listed building and the guidance Streets for All will be referenced.</p> |

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|     |      | Policy 6                 | <p>recommend that 'listed buildings' is substituted for 'heritage assets' in this sentence, in order to reflect the terminology found in national planning policy. We also recommend that, in order to encourage a high standard of urban design in new developments, an additional requirement for new development to be built to the standards and forms found in government guidance 'Manual for Streets', and the principles recommended in Historic England's own guidance 'Streets for All'.</p> <p>Your neighbourhood plan is also an opportunity for the community to designate Local Green Spaces. Green spaces are often integral to the character of place for any given area, and your plan could include policies that identified any deficiencies with existing green spaces or access to them, or aimed at managing development around them. At present, your plan identifies Important Open Spaces in Table 1. We suggest that these are, where appropriate, officially designated as 'Local Green Spaces' as set out in paragraph 77 of the NPPF, which will afford them a greater level of protection. Locality has produced helpful guidance on this, which is available here:<br/> <a href="https://mycommunity.org.uk/resources/neighbourhood-planning-local-green-spaces">https://mycommunity.org.uk/resources/neighbourhood-planning-local-green-spaces</a>.</p> <p>Communities that have a neighbourhood plan in force are entitled to claim 25% of</p> | <p>Comments noted. The Steering Group decided not to request designation of Local Green Spaces as defined in the NPPF.</p> <p>Comments noted. At this time North Norfolk District Council does not have a CIL</p> |

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|     |      |                          | <p>Community Infrastructure Levy (CIL) funds raised from development in their area. The Localism Act 2011 allows this CIL money to be used for the maintenance and on-going costs associated with a range of heritage assets including, for example, transport infrastructure such as historic bridges, green and social infrastructure such as historic parks and gardens, civic spaces, and public places. As a Qualifying Body, your neighbourhood forum can either have access to this money or influence how it is spent through the neighbourhood plan process - for instance by including a Schedule of infrastructure works that would be appropriate for the money to be spent on. At this point, we note that North Norfolk District Council does not have a CIL process in place. Historic England nonetheless recommends that the community identifies the ways in which future CIL, if implemented by North Norfolk DC, can be used to facilitate the conservation of the historic environment, heritage assets and their setting, and sets this out in your neighbourhood plan. More information and guidance on this is available from Locality, here:<br/> <a href="https://mycommunity.org.uk/resources/community-infrastructure-levy-neighbourhood-planning-toolkit/">https://mycommunity.org.uk/resources/community-infrastructure-levy-neighbourhood-planning-toolkit/</a></p> <p>Further information and guidance on how heritage can best be incorporated into Neighbourhood Plans has been produced</p> | <p>charging system. There are a number of projects listed in section 14 that could be implemented should such funding become available.</p> <p>Comments noted and thank you for advising of the guidance available.</p> |

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|     |      |                          | <p>by Historic England, including on evidence gathering, design advice and policy writing. This webpage contains links to a number of other documents which your forum might find useful in helping to identify what it is about your area which makes it distinctive, and how you might go about ensuring that the character of the area is protected or improved through appropriate policy wording and a robust evidence base. The guidance document available to download also provides useful links to exemplar neighbourhood plans that may provide you with inspiration for your own. This can be found here:<br/> <a href="http://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/">http://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</a></p> <p>The following general guidance also published by Historic England may also be useful to links to in the plan, to assist members the forum in managing change in the neighbourhood area once the plan is Made:</p> <p>HE Advice Note 2 - making changes to heritage assets:<br/> <a href="https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/">https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/</a></p> <p>HE Good Practice Advice in Planning 3 - the setting of heritage assets:</p> |                                       |

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|     |      |                          | <p><a href="https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/">https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/</a></p> <p>HE Advice Note 3 - site allocations in local plans:<br/> <a href="https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans">https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans</a></p> <p>HE Advice Note 7 - local listing:<br/> <a href="https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7">https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7</a></p> <p>We recommend the inclusion in your glossary of relevant terminology contained in the NPPF, in addition to details about the additional legislative and policy protections that heritage assets enjoy.</p> <p>Finally, we should like to stress that this advice is based on the information provided by Holt Town Council in your correspondence of 11 January 2018. To avoid any doubt, this 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 neighbourhood plan, where we consider these would have an adverse effect on the historic environment.</p> <p>If you have any queries about this matter or would like to discuss anything further, please</p> | <p>Comments noted. Glossary will be updated with additional terms.</p> <p>Comment noted.</p> <p><b>Proposed action:- Comments noted and the following changes to the HNP will be made:-</b></p> <p><b>4: Objective 1 reworded as follows "...rural,</b></p> |

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|              |                                |                          | do not hesitate to contact me.  | <p><b>built and historic environment, character and ethos...”</b></p> <p><b>6.5: Core Aim 3 reworded to “New developments will be required to respect the setting of Holt’s designated and non-designated heritage assets, and preserve or enhance the character and appearance of the town”.</b></p> <p><b>Policy 1: replace the words “listed buildings” with “heritage assets” and insert after “Building for Life” “and Streets for All principles ....”</b></p> <p><b>Insert supporting text after 8.11 to reference Historic England’s guide Streets for All.</b></p> <p><b>Glossary: update with heritage terms from NPPF.</b></p> |
| <b>PS/42</b> | North Norfolk District Council |                          | <p>Thank you for the opportunity to comment on the emerging Holt Neighbourhood Plan (HNP) during the formal pre submission consultation. The comments below and the attached schedule forms Officers formal comments on the emerging HNP at Regulation 14 stage of the Neighbourhood Planning (General) Regulations 2012 as amended.</p> <p><b>General Comments</b><br/>Comments are made on a number of policies, highlighting that there may not be</p> | <p>Thank you for your response. Your comments are noted and address individually below.</p> <p>Comments noted and thank you for your guidance.</p>  |

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|     |      |                          | <p>adequate evidence / justification; potential conformity issues and duplication with the Development Plan process. This is something that is often picked up on by neighbourhood plan examiners, resulting in substantial amendments being required by them in order for the proposed plan to move forward to any referendum.</p> <p>Neighbourhood plans are not freestanding documents and are required to be developed in line with the Local Plan and strategic policies, underpinned with evidence so that they complement the existing policies by being in general conformity with the existing DevelopmentPlan, and where necessary add more local distinction. Only plans and policies that meet the legislative tests can go on and form part of the Development Plan for the district. The HNP currently covers many general aspects of policy, in many placeson the surface does not seem to bring additional locally specific decision making criteria / policies to the table and repeatsthe thrust of many existing DevelopmentPlan policies, rather than being focused on specific added value opportunities.</p> <p>The Development Plan consists of: the adopted Core Strategy, the Site allocations Development Plan Document (DPD), and the Proposals Map. Of material consideration are the Design Guide Supplementary Planning Document (SPD)</p> | <p>Comments noted. The HNP will demonstrate in the Basic Conditions Statement how it conforms with the National Planning Policy Framework (NPPF), Core Strategy Incorporating Development Control Policies and Site Allocations Development Plan Document. The emerging Local Plan, which North Norfolk District Council (NNDC) is working on, will also be given consideration and the appropriate weight given to its stage.</p> <p>Comments noted.</p> |



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|     |      |                          | <p>and the Landscape Character Assessment SPD. Consideration needs to also be given to the emerging Local Plan and the refreshed evidence across a number of detailed evidence areas. As part of the Council’s support for neighbourhood planning a number of guidance documents, including the identification of strategic and non-strategic policies, check sheets have been produced. These are available on the Council’s web site and it is recommended that these are reviewed as part of the next iteration of the HNP. The Council would encourage the steering group to take up its offer of an informal review of policies and supporting evidence / justification ahead of any final submission. This would provide in advance comments on whether the emerging policies are considered likely to meet the Basic Conditions tests and could take the form of offering alternative wording to make a policy stronger and or to align with the emerging Local Plan in order to extend the HNP effectiveness. A copy of the guidance is available at:</p> <p><a href="https://www.north-norfolk.gov.uk/tasks/planning-policy/neighbourhood-planning/">https://www.north-norfolk.gov.uk/tasks/planning-policy/neighbourhood-planning/</a></p> <p>The Government’s National Planning Practice Guidance (PPG) – Neighbourhood Planning sets out the requirements for policies in Neighbourhood Plans. This includes:</p> |                                       |

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|     |      |                          | <p><b>"How should the policies in a neighbourhood plan be drafted?"</b></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. It should be concise, precise and <b>supported by appropriate evidence</b>. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.</i></p> <p>Paragraph: 041 Reference ID: 41-041-20140306"</p> <p><i>And</i></p> <p><b>"General conformity with the strategic policies contained in the Development Plan</b></p> <p><b>What is meant by 'general conformity'?</b><br/> <i>When considering whether a policy is in general conformity a qualifying body, independent examiner, or local planning authority, should consider the following:</i></p> <ul style="list-style-type: none"> <li><i>• whether the neighbourhood plan policy or development proposal supports and upholds the general principle that the strategic policy is concerned with</i></li> <li><i>• the degree, if any, of conflict between the draft neighbourhood plan policy or development proposal</i></li> </ul> |                                       |

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|     |      |                          | <p><i>and the strategic policy</i></p> <ul style="list-style-type: none"> <li><i>whether the draft neighbourhood plan policy or development proposal provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that policy</i></li> <li><i>the rationale for the approach taken in the draft neighbourhood plan or Order and the evidence to justify that approach</i></li> </ul> <p>Paragraph: 074 Reference ID: 41-074-20140306.”</p> <p>The PPG states that a neighbourhood plan should support the strategic development needs set out in the Local Plan and should plan positively to support local development as outlined in para 16 of the National Planning Policy Framework (NPPF).</p> <p>Neighbourhoods should:</p> <ul style="list-style-type: none"> <li><i>develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;</i></li> <li><i>plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan;</i></li> </ul> <p>NPPF, 2012 para 16,</p> | <p>Comment noted.</p> <p>Comment noted. The HNP identifies the spatial context, strategic policy context and is positive in its approach to the existing site allocations HO1, HO9 and CP10.</p> <p>Comments noted.</p> |

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|     |      |                          | <p>Comments are detailed in the schedule below to reflect this guidance and the legislative requirements in order to aid the HNP group in policy development and to refine the plan so that it has the greatest opportunity of meeting the Basic Condition tests and to sit alongside the existing Development Plan (and also prolong its effective life to accord with the emerging Local Plan), with the aim of reducing the risk of further amendments being required by the appointed independent examiner.</p> <p>A number of policies refer to complying with the requirements of and policies of the HNP and the Development Plan etc. This seems superfluous in all cases, as determination of any planning application must be in accordance with the Development Plan unless material considerations indicate otherwise. This is enshrined in national policy</p> <p>It is recommended that the policies referred to are reassessed and amended to comply with the PPG (e.g. they provide “an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that initial policy”) or that they are deleted, or that additional evidence / justification is provided. This additional evidence will be required to assist HNP in justifying its approach through the required Basic Conditions Statement at submission stage and examination. In some circumstances it</p> |                                       |

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|     |      |                          | <p>may be appropriate to change a particular policy to supporting explanatory text, or aspirational text.</p> <p>In order to remain effective and useful in the determination of applications it is recommended that policies are worded so that they can be applied in a mindful way and should contain an operative clause (justified &amp; evidenced). A failure to make a policy specific to a particular requirement will render it ineffective. If a number of policies remain this way collectively there is the potential to make the whole plan ineffective. Any repetition of national and local policies should be removed.</p> <p>Following this Regulation 14 consultation there is an opportunity for the Neighbourhood Plan group to review and adjust the plan and the opportunity to document specific evidence before submission to the Council under Regulations 15 &amp; 16. It is at this stage that the Council will review the Draft Neighbourhood Plan and submission documentation for conformity to the entire legal framework.</p> <p>Concerns are raised around the robustness of the undertaking of the Strategic Environmental Assessment, SEA. We have previously advised that the Council will undertake this exercise on behalf of the group and this would reduce the risk at examination. Once the policies have been</p> |                                       |

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|     |      | General                  | <p>revised as a result of this consultation we would be pleased to undertake this exercise for you so that the HNP can be satisfied that this part of basic conditions is addressed ahead of examination. Further detailed commentary is included in the schedule below.</p> <p>The advice contained in the schedule is compiled from across the authority and varying specialist departments. We trust that these comments are helpful and constructive. Should you wish to discuss any issues or require further explanations please contact a member of the policy team.</p> <p style="text-align: center;"><b>Schedule of Comments</b></p> <p>1. In addition to the general comments made above comments are made on a number of policies, highlighting that there may not be adequate evidence / justification or that they duplicate other Development Plan policies. This is something that is often picked up on by Neighbourhood Plan Examiners, with substantial amendments made by them to the proposed Neighbourhood Plan. Neighbourhood plans are not freestanding documents and are required to be developed in line with the Local Plan and strategic policies, underpinned with evidence. The Government’s national Planning Practice Guidance (PPG) – Neighbourhood Planning sets out the</p> | Comment noted.                        |

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|     |      |                          | <p>requirements for policies in Neighbourhood Plans. This includes:</p> <p><b>“How should the policies in a neighbourhood plan be drafted?”</b></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. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.</i></p> <p>Paragraph: 041 Reference ID: 41-041-20140306”</p> <p>And</p> <p><b>“General conformity with the strategic policies contained in the Development Plan What is meant by ‘general conformity’?”</b></p> <p><i>When considering whether a policy is in general conformity a qualifying body, independent examiner, or local planning authority, should consider the following:</i></p> <ul style="list-style-type: none"> <li>• <i>whether the neighbourhood plan policy or development proposal supports and upholds the general principle that the strategic policy is concerned with</i></li> <li>• <i>the degree, if any, of conflict between the draft neighbourhood plan policy or development proposal</i></li> </ul> |                                       |

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|     |      | General                  | <p><i>and the strategic policy</i></p> <ul style="list-style-type: none"> <li>• <i>whether the draft neighbourhood plan policy or development proposal provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that policy</i></li> <li>• <i>the rationale for the approach taken in the draft neighbourhood plan or Order and the evidence to justify that approach</i></li> </ul> <p>Paragraph: 074 Reference ID: 41-074-20140306.”</p> <p>Therefore, it is recommended that the policies referred to are reassessed and amended to comply with the PPG (e.g. they provide “an additional level of detail and /or a distinct local approach to that set out in the strategic policy without undermining that policy”) or that they are deleted, or that additional evidence / justification is provided. In some circumstances it may be appropriate to change the particular policy to supporting explanatory text.</p> <p>2. Despite the supporting text implying otherwise, many of the policies are high level repetitions of national policy and existing Development Plan policies. It would be reasonable to expect that any additional policy included in the HNP would be to add a flavour of local distinctiveness rather than repetition of existing policies. To</p> | Comments noted.                       |



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|     |      | General                  | <p>make the HNP distinctive and to be effective in the determination of planning applications many of the policies should be revised to give the document more of a bespoke feel and local purpose, adding detail to the Development Plan rather than duplicating its generality. More detail on these issues is provided in the specific policy comments below.</p> <p>3. A number of policies refer to complying with the requirements of and policies of the HNP and Development Plan. This is superfluous in all cases as determination of any planning application must be in accordance with the Development Plan unless material considerations indicate otherwise. This is enshrined in national policy and it is likely that any inspector will remove this reference from all policies across the plan.</p> <p>4. It is recognised that it remains important to the NP group to reflect community aspirations however guidance is clear that Neighbourhood Plans do not seek to duplicate existing statutory and non-statutory policies or seek to introduce non land use planning matters. <b>The Council advises that areas of duplication should be reviewed and removed prior to final submission.</b></p> <p>5. Before including policies on aspirations first it should be checked if there is an</p> | <p>Comments noted.</p> <p>Comments noted.</p> <p>Comments noted.</p> |
|     |      | General                  |   |  |



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|     |      | General                  | <p>that they can be applied in a mindful way and should contain an operative clause which should be justified and evidenced. A failure to make a policy specific to a particular requirement will render it ineffective. If a number of policies remain this way collectively there is the potential to make the whole plan ineffective. Any repetition of national and local policies should be removed. Ineffectively constructed policies will be difficult to apply and run the risk of deletion by the inspector.</p> <p>7. Conformity – throughout the plan there are references to the Core Strategy, Local Plan and Development Plan of the district. The neighbourhood plan is being brought forward ahead of the emerging new Local Plan and although the dates roughly align, in order to future proof the NP it is recommended that text is amended throughout the document and in places within specific policies so that the reference is made not only to the Core Strategy but to its subsequent revision (the emerging Local Plan) or simply refer to the Development Plan.</p> <p>To avoid the risk of policies in a NP being superseded by a later Local Plan it is necessary for the two plans to work in a complementary way. In general the emerging Neighbourhood Plan talks about the Local Plan policies contributing to support the NP policies. However, as</p> | <p>Comment noted.</p> <p>Comments noted.</p> |

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|     |      | General                  | <p>detailed in the national guidance it is the NP policies that need to align with the Local Plan. It is the NP policies that can bring specific local approaches and detail. Suggest that this is clarified in future iterations of the NP to avoid any misrepresentation and to provide a fuller understanding to the local community.</p> <p>8. As above the NP should reference the 'emerging Local Plan' as well as the adopted Core Strategy / Development Plan. The HNP is being brought forward in advance of the emerging Local Plan and due to this timing there is an increased element of risk. It is the emerging Local Plan that will set the growth targets and strategic direction for the lifetime of the neighbourhood plan.</p> | <p>Comments noted.</p> <p>HNP does not seek to allocate additional sites for residential or commercial use.</p>            |
|     |      | General                  | <p>9. Supporting evidence – A NP is required to be 'justified and evidenced'. Although some evidence on local social, economic and environmental conditions and issues is included in the consultation document these are not referenced and no specific evidence based document has been made available on the HTC web site. It is best practice to make all the evidence based documents available for public consultation / reference.</p>  | <p>Comments noted. All relevant documents have been published on the dedicated pages of the Holt Town Council website.</p> |

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|     |      | Images – General Point   | <p>Plans should be informed by the most up-to-date information. It is considered that large parts of the evidence base developed for the emerging Local Plan is also likely to form part of the evidence base of the neighbourhood plan. As a minimum this evidence base – provided that it has been used - should be referenced and made available on the HTC website along with all the background information / feedback received from any previous consultation. This includes the SA Scoping document which is not available on the web site but was consulted on in the autumn of 2017. In addition the feedback given from all parties in respect of the SA Scoping report should also be publically available. In particular the feedback from the statutory bodies need to be made available to the Council as it is the council that must satisfy itself that these separate regulations have been adhered to prior to examination.</p> <p>10. Several of the maps are blurred and/or stretched. These should be formatted correctly and a scale applied. It may be that they have been copied from published documents rather than the source map requested or reproduced. If re-published the appropriate permissions should be obtained.</p> <p>The map detailing one of the conservation areas that cover the NPA is incorrect and based on out of date information. Specifically this will need to be replaced to</p> | <p>Comments noted.</p> <p>Comments noted.</p> <p>Comment noted.</p> |

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|     |      | General                  | <p>reflect the true and most recent extent of the conservation area. If not the map and/or policy could be deleted by the inspector as not being founded on the most up to date information and evidence.</p> <p>11.<br/>The format of the document is in places misleading and additional clarifying text should be added. For example, the site allocation section, although factually true, i.e. the sites have been allocated through the Core Strategy, planning permission has since been granted on all of the residential sites detailed and work has commenced on some of these and other development sites across the town. It is misleading to imply that the emerging neighbourhood plan could influence development on these sites.</p> <p>Additional text should be used to clarify the wider spatial and strategic planning context and greater reference should be made of the relationship to the future allocations and future growth levels that the NP could influence through specific local policies. Consideration could be given to use this section to detail the future choices / direction of growth which the NP could influence. This information will be detailed in the forthcoming Local Plan consultation but is also publically available. Specific text, along with other matters of advice can be discussed with officers, should you wish to take up the offer of informal review sessions</p> | <p>Comment noted.</p> <p>Comments noted.</p> <p>The forthcoming emerging Local Plan consultation is eagerly awaited.</p> |



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|     |      |                          | <p>required. This is preferably in Microsoft Word format, but an unlocked PDF may be possible to work with. This reflects the legislative requirement that it is the Council who are required to amend the plan in line with the inspector's recommendations prior to any referendum. A failure to supply the appropriate document will run the risk of delay and prevent the NP from moving to the next stages. Submission check sheets can be found on</p> <p><a href="https://www.north-norfolk.gov.uk/tasks/planning-policy/neighbourhood-planning/">https://www.north-norfolk.gov.uk/tasks/planning-policy/neighbourhood-planning/</a></p> |  |
|     |      | Page 2                   | <p>14.<br/>Second line – Title - Typo - repetition of the word 'Council'</p>  | <p>Comment noted and the second 'Council' will be deleted.</p>   |
|     |      | Page 3                   | <p>15.<br/>Welcome the reference to future growth for the town.</p>   | <p>Comment noted.</p>  |
|     |      | Page 3                   | <p>16.<br/>Reference to encouraging all residents and stakeholders to respond - it is the steering group's responsibility for informing and seeking representations from those who may not be residents but nevertheless have an interest in the parish as well as statutory consultees. Not all stakeholders such as land agents, landowners, developers and infrastructure providers live in the parish. Failure to adequately advise of a</p>  | <p>Comments noted. The Steering Group have undertaken extensive consultation and recognises that not all stakeholders live in the parish.</p> <p>The Consultation Statement provides the detail required demonstrating how these activities have been undertaken and the results achieved.</p> |



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|     |      | Page 4                   | <p>consultation could increase the risk of challenge at later stages. In any submitted consultation statement you will need to justify / demonstrate how such parties have been offered the opportunity to inform the plan at this stage. As previously advised, information is held by the Council on site ownership and promoters which could assist you in satisfying this requirement.</p> <p>17.<br/>Map like others throughout is blurred and/or stretched – this should be amended in the submission. Text should be added that clarify that the neighbourhood plan area is the area that the emerging plan covers and has influence over.</p>   | <p>Comment noted and thank you for providing the additional resource.</p> <p>Comment noted. Will check and replace if necessary.</p> |
|     |      | Page 6                   | <p>18.<br/>Section 1.2 – As detailed above the starting point is the identification of key issues from the community. It is recognised that it is important to the NP group to reflect community aspirations, however, should the introductory text explain in more detail that before including policies on such aspirations first it should be checked that there is not an appropriate policy response in the Development Plan - local as well as national as detailed above and secondly that any aspiration and policy approach identified to address the aspiration is subsequently supported by evidence. Inspectors are increasingly commenting on the lack of evidence to support policy development</p> | <p>Comment note.</p>   |

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|     |      | Page 6                   | <p>and such approaches run an increased risk of alteration and deletion by the inspector if it is not supported by more than just community feedback. This section provides the opportunity to explain how the NP sits with the Development Plan and should not be read as a standalone policy document.</p> <p>19.<br/>Section 1.2 – All Development Plans including neighbourhood plans need to be worded in a positive way to influence and facilitate development. Suggest the removal of the word 'Protect' - this is restrictive in this context and contrary to theNPPF – other such references should also be reviewed.</p> | <p>Comment noted. The NPPF uses the word 'protect' many times within its text. As suggested, this will be reviewed.</p>  |
|     |      | Page 10                  | <p>20.<br/>In 2.3.1, 2.3.2 and 2.3.5 'The Holt Vision Document' is referred to as 'the Vision project', 'The Vision' and 'the Vision Study' - could it just be referred to in one way? This is also an evidence document and therefore needs to be made publically available. The Vision Document was undertaken some time ago is it still relevant? Are you able to demonstrate that it remains relevant?</p>  | <p>Comment noted. The Vision project was launched in the autumn of 2011 to produce a visioning study for Holt that "will have sustainable long term benefits and future activities that are stimulated and achieve impacts over the next 25 years." The outcome was a document that was published in 2012. Considering the purpose it is considered very much relevant. The reference to the document does need to be consistent and the text will be reviewed to ensure that the correct reference is made.</p> |
|     |      | Page 11                  | <p>21.<br/>2.4.3 Typo – 'processes' should read 'process'</p>   | <p>Comment noted. Will correct typo.</p>   |

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|     |      | <p>Page 12</p><br><p>Page 19</p> | <p>22.<br/>2.5.3 the term 'excluded development' should appear in the glossary</p> <p>23.<br/><b>Review your objectives as you progress your plan: The steering group</b> should always keep the Vision and Objectives in mind as the Plan develops; they should act as a marker. The policies should clearly flow from the issues and themes that are identified. This will help in the plans structure and for it to remain focused.</p> <p>As the HNP is developed, new issues may come to light or you may decide to change your priorities. This could be as a result of significant comments received during community consultation or you may find that there is insufficient evidence to justify a particular policy approach. Your objectives (and even the vision) are not set in stone and could require review and amendments to reflect these changes.</p> <p>The views of the wider community and the issues collectively that the steering group and community think the plan should address may not of themselves be sufficient evidence to justify your vision, objectives and policies. As discussed you will need to substantiate them with evidence The study references the objectives as derived by</p> | <p>Comment noted. The definition will be added to the Glossary.</p> <p>Comments noted. The HNP Mission Statement (term used instead of 'Vision' to prevent confusion with the Vision Project and A Vision for Holt) and Objectives were drafted following extensive community engagement to identify key priorities. The Mission Statement and Objectives were checked with the community to make sure they were what the community wanted.</p> <p>Comment noted.</p> <p>Comment noted.</p> |

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|     |      |                          | <p>"2012 Vision document" which was formed by town councillors and other partners. (HNP Page 10)</p> <p>Objectives should be deliverable and in the process of plan review these should be revised to remain connected to the emerging policies. –<br/>For example</p> <ul style="list-style-type: none"> <li>• There is no objective relating to the natural environment despite there being a policy theme on environment. For that reason the Inspector could reasonably expect to see an objective relating to this theme.</li> <li>• In addition objective three has the potential to conflict with statutory policies around the Council's allocation policy and should be revised in line with comments on policy 4 below in order to provide the appropriate link through the document and avoid conformity issues through examination.</li> <li>• Objective 1 refers to preserving the character of Holt but surprisingly does not refer to enhancing it. Whilst it does mention improving design, this is not necessarily the same thing. It is therefore suggested that the wording should be expanded to include the positive as well as the neutral. This would then align more closely with the statutory duty under s72 of the</li> </ul> | <p>Comment noted.</p> <p>Each of the HNP policies identifies how it contributes to the Objectives and the Core Strategy Aims.</p> <p>Comment noted.</p> <p>Comment noted.</p> |

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|     |      | Page 21                  | <p>Planning (Listed Buildings &amp; Conservation Areas) Act, 1990 as amended, which requires those exercising planning functions within conservation areas to pay special attention to preserving and enhancing. The objective would then align with national policy and avoid potential conformity issues with the inspector - this would need to be carried through to any appropriate policy.</p> <p>24.<br/>6.1.1. does not list all the documents that make up the LP - should also include:<br/>North Norfolk Proposals Map 2008<br/>And list the North Norfolk Design Guide 2008 SPD &amp;<br/>North Norfolk Landscape Character Assessment 2009, SPD as material considerations</p> <p>For clarity and consistency the Core Strategy and the Site Allocations references should have 'North Norfolk' as part of the titles.</p> <p>LDF is also old terminology - LDF's have been replaced by the term Local Plan A</p> | <p>Comment noted. Will add North Norfolk Proposals Map 2008.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted. Although the NNDC website is a little confusing as it refers to both</p> |

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|     |      | Page 22                  | <p>simpler way of reference would be the Development Plan of North Norfolk.</p> <p>25.<br/>6.3 To remain effective the emerging NP needs to also reflect the emerging Local Plan. Future iterations should detail the emerging spatial priorities. This section should be expanded to cover the emerging preferred overarching housing need and updated spatial strategy. It could and should also provide updates to the future broad areas of identified growth that this NP's policies will, once part of the Development Plan, influence development proposals. Officers can assist the Steering group should you wish to update this section.</p> <p>As referenced above NP's are required to plan positively to support local development outside the strategic elements of the Local Plan (NPPF, para 16). Given the fact that the NP is now emerging close to the revised Local Plan it is not unreasonable for any inspector to seek greater conformity or</p> | <p>Local Plan and Local Development Framework. It even abbreviates the Local Plan as "(LDF)". The term Development Plan of North Norfolk has no status as a term and would not be appropriate to use.</p> <p>The term Local Development Framework in the HNP will be replaced with the term Local Plan.</p> <p>Comment noted. A draft of the emerging Local Plan is not currently available.</p> |

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|     |      | Page 23                     | <p>spatial context of the Local Plan contained in the NP.</p> <p>26.<br/>6.4.5 – the current status of these sites should be included here. As you are fully aware all these sites have planning permission. It is misleading to imply that the NP will have influence on these sites. Future iterations of the NP offer the opportunity to include this important contextual information.</p>  | <p>Comment noted. This section gives context and an overview to the current policies and factual details site allocations. The text does not seek to mislead or imply that the HNP can influence these. Although, once the HNP is 'made' should amended proposals be submitted then those proposals would have to meet the policies of the HNP when the planning application is determined.</p> |
|     |      | Page 23                     | <p>27.<br/>6.4.8 – Additional large scale development is also being undertaken on Cromer Road as part of current development in the town. For completeness an illustration/map of this site(s) should be included.</p> <p>To create mapping yourselves, either through your consultant or through the on line mapping available to Parish Councils the facility at <a href="http://www.parish-online.co.uk/">http://www.parish-online.co.uk/</a> could be used.</p> | <p>Comment noted.</p>   |
|     |      | Page 27                     | <p>28.<br/>7.2 add word previous .... to results of <i>previous</i> consultation</p> <p><b>Design and Character</b></p>   | <p>Comment noted. The text will be update.</p>  |
|     |      | <b>Design and Character</b> | <p>29.<br/>General - The Holt Society have undertaken</p>   | <p>Comment noted. A member of the Holt</p>  |

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|     |      | <p>Page 28 - 41</p> <p>Policy 1</p> | <p>much work in raising awareness of the importance of good Design. In particular, some of their published advice on colour and signage in a Georgian context could have been transcribed into policy and thus given the HNP a more tailored, local feel, and the Society could be contacted for assistance. As it is, it could be seen by the inspector that some of the content of this policy / section is rather general and repeats some of the existing Development Plan.</p> <ul style="list-style-type: none"> <li>Whilst the desire to include building for life standards is laudable, these are classed as industry standards for new housing developments as published by the Design Council in January 2015. The Ministerial Statement of March 2015 identified that planning policies should not identify local technical standards or requirements relating to the construction, internal layout or performance of new dwellings. This included policies requiring any level of compliance with the Code for Sustainable Homes and others to be achieved by new development. The use of such standards has been overtaken by national policy. The examination process requires that the Plan is examined against national policy at the time of the examination rather than at the time of its preparation, (2013- 2018). Any</li> </ul> | <p>Society is on the Steering Group. The Society also responded directly on the Pre-Submission Consultation, see PS/48 for details and comments.</p> <p>Comments noted. The Building for Life does not include technical standards. Its use is encouraged by Policy 1 as a way to guide better planning of new development through urban design that is safe and provides everything that should be expected for a new community.</p> <p>Comment noted, not in Policy 1.</p> <p>Comment noted, not in Policy 1.</p> |





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|     |      |                          | <p>these issues obviously do have an influence on design, their intervention here does not help the flow and continuity of the document. Would they not merit a separate chapter? The demography and other local issues could be usefully documented in a spatial portrait of Holt in the early chapters rather than intertwined with the aim of justification to each approach.</p> <ul style="list-style-type: none"> <li>• Bullet point 1 - This is a duplication of CS Policy EN4 and, as currently worded, is not required in the NP. See first General Comment, above.</li> <li>• Bullet 2 policy 1 – This is a duplication of CS Policy EN8 and, as currently worded, is not required in the NP. See first General Comment, above. Irrespective a supporting referenceto the Conservation Area (CA) should be added into this Theme’s justification text. As written a supporting reference does not appear until much later in the document (at 9.15 in Key Theme 2). Even here, however, there is no explanation as to what a CA is or what it means in practice. There is also no mention / any recognitionwithin the document of the Glaven Valley CA to the west of the town</li> </ul> | <p>Comment noted. The wording of criteria 1 is completely different to EN4, which is not specific enough and does not recognise individuality and local distinctiveness for Holt.</p> <p>Comments noted.</p> <p>Comment noted. Map of CA to be included.</p> |

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|     |      |                          | <p>and which covers large parts of the HNP area not covered by the HoltCA. The Glaven Valley CA abuts the Holt CA and should also be shown on a plan in the NP. Whilst admittedly this designation is slightly unusual and currently under review it does have significant implications for any design and character considerations in the parish and should be detailed in the plan. The Council's conservation officer will be able to assist the steering group more specifically if assistance is required.</p> <ul style="list-style-type: none"> <li>Bullet point 1 policy 1 – whilst the recommendation that schemes should include one and two bedroom properties is welcomed, the Development Plan policy H01 already includes this requirement and sets a percentage. Part of this policy is identified as strategic and the NP approach potentially raises conformity issues for the inspector. The proposed policy requirement in the NP has no percentage requirement and could be met by providing 1 x 1 bed + 1 x 2 Bed property in a scheme of any size followed by the remaining dwellings being larger. This bullet point should therefore be removed and a reference to the Council's relevant planning policy should be included</li> </ul> | <p>Comment noted.</p> <p>The Core Strategy Policy HO1 is welcomed with at least 40% of the total number of homes will be no bigger than 70sqm internal floor space and incorporate two bedrooms or fewer. Although this is a district wide Policy the criteria in the HNP requires the assessment of 'local need' as well.</p> <p>There is concern that the percentage in Policy HO1 is too high, lacks flexibility and may make impact on the viability of developments. It is anticipated that Policy HO1 will either be deleted or updated in the emerging Local Plan.</p> |

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|     |      |                          | <p>in the NP supporting text. In addition it is likely that the emerging Local Plan will develop a new strategic policy on tenure in line with wider issues of need and viability. It will be important to keep this policy approach under review as the LP evidence is updated. The risk being that the policy requirement will be superseded by the LP.</p> <ul style="list-style-type: none"> <li>• It is unclear why the paragraphs on waste disposal close out the supporting text here - might they not be more usefully be included under the infrastructure theme?</li> <li>• 4th bullet, although this can happen (e.g. Alysham), there is no known evidence to suggest that a policy is required in Holt or that it has been raised as an issue. How will the policy requirement be applied in areas of the parish where there is no main sewage system and septic tanks are the only available means? Suggest the word 'mains' is removed from the sentence. It may be appropriate for a new mains sewerage station to be provided, e.g. If development occurs in the more rural parts of the parish, such as through barn conversions. In these instances there may not be a mains sewerage system in the vicinity. Note the</li> </ul> | <p>Text will be added to recognise the good work NNDC is doing in seeking to address the imbalance in the housing stock and the provision of more smaller and, therefore, more affordable homes.</p> <p>Comments noted. Through the consultation process the Steering Group have become aware of the Anglian Water service and that developments in adjoining districts have been occupied prior to drainage solutions being completed. The Steering Group do not want to see this sort of mistake being made in Holt – hence HNP Policy 1, criteria 4.</p> <p>Giving consideration to the rural nature of some parts of Holt and that mains sewerage may not be the water drainage solution the word "mains" will be deleted as suggested.</p> |

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|     |      |                          | <p>appropriate solution may be a package treatment plant or a septic tank or in rare cases a cess pit – this is determined by the submission of a foul drainage assessment with any application where applicants propose not to connect to mains – applicants have to be able to provide evidence as to why connection to a mains sewer is not feasible. The Environment Agency as the statutory consultee will provide statutory advice on any application and such advice would potentially be given more weight in any determination of an application.</p> <ul style="list-style-type: none"> <li>• 5th bullet this is not a design requirement, other than the requirement that affordable housing is tenure blind</li> <br/> <li>• Bullet point 7 – this is not a design or character requirement. The Council would not support the proposed approach which is more restrictive than the approach already in use and so the proposed approach could have an unintended negative</li> </ul> | <p>Comment noted.</p><br><p>Comment noted. As Holt is a growth area and has identified sustainability issues (relating to affordability of homes) the Steering Group would not want to see funds that should be spent in Holt to meet the local need spent elsewhere.</p> |

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|     |      |                          | <p>impact. In Section 106 agreements the Council stipulates that it will use its best endeavours to spend financial contributions for affordable housing in the parish from which they were received but will use them in an adjoining parish if it is not possible to spend in the host parish or ultimately in any parish in North Norfolk. This approach ensures that the monies, which are time limited by law, can be spent and will not be required to be returned to the planning applicant if it is not possible (due to a lack of sites or the cost of purchasing an existing dwelling) to spend the monies in the host parish in the specified period. This approach is particularly important when small sums are received. The policy could also be seen as restrictive. The policy wording should be amended as a minimum to include adjoining parishes and should reference the Council's strategic housing allocation policy.</p> <ul style="list-style-type: none"> <li>• Bullet 8 – ref garage. This policy could restrict the provision for garages in flats and other affordable housing products as well as market housing. E.g. where a terrace of housing is proposed. Is such a requirement sufficiently evidenced?</li> </ul> | <p>With the expected growth of Holt it is not anticipated that commuted sums are likely to come forward, but, if they do, it is felt very strongly that the opportunity to spend those funds on providing affordable homes for Holt is important and can be achieved with the usual 5-year timeline.</p> <p>Comment noted. As there is identified need in Holt then the additional affordable homes should be delivered in Holt to meet that need.</p> <p>Comments noted. Garage blocks are recognised as poor design and their inclusion in any sort of proposals in Holt is unwelcome. If a garage is provided it should be affiliated to the home using it.</p> |



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|     |      | Policy 3                 | <p>be seen as more of an aspiration outside the policy. Nowhere in the document does it set out what the 'principles' are. These need to be made clear. Developers and decision makers would need to be clear as to what is being encouraged. Should this only apply to certain types of development? Adding the wording "have regard to the principles" ....may be acceptable or a requirement for developers to submit a statement demonstrating how any proposal will have regard to the principles and how the proposal would / could (subject to viability) incorporate the principles could be a way around this issue. However it should be noted an inconsequential effect may be that all development needs to reflect the policy, what if the application is for one dwelling or designed for the younger generation e.g. 1 or 2 bed flats?</p> <ul style="list-style-type: none"> <li>• Policy 3 - Residential Care Accommodation - This is more a restatement of other policies than actually supporting the provision of more appropriate accommodation and confuses residential homes and supported housing. Housing with Care (sometimes known as extra care) is separate from retirement</li> </ul> | <p>Comment noted. As part of the housing stock all development should be encouraged to give consideration to the principles and implementing as many as are possible, viable and appropriate to that development.</p> <p>Comment noted. The local need will need to be identified and evidenced by the developer - this can be done using data that NNDC may have or by undertaking a needs survey.</p> |



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|     |      | Policy 4                 | <p>housing and separate from residential care properties. Not clear what is meant by a requirement to show a local need – how will this be evidenced or justified? It is unclear why this policy is needed and what it adds or how it could be applied.</p> <ul style="list-style-type: none"> <li>• Policy 4 - The pre-amble to this policy states that only affordable homes to rent would be subject to this policy and it would apply to initial and all subsequent lets and suggests that it is designed to allow younger people to remain in Holt; a) the wording is not carried through to the policy, b) the proposed policy will not achieve this requirement of keeping younger people in Holt.</li> <li>• It is not clear what the rationale for up to 25% of affordable homes being subject to these criteria is and why this percentage was chosen – any requirement needs to be supported by evidence and a reasoned justification on what the policy aims to achieve and how it is therefore relevant.</li> </ul> | <p>Comment noted. Young people, while not explicitly mentioned, are included in the all the criteria for this policy. Making affordable housing available to people (including younger people) will create the opportunity that does not currently exist for them to remain in Holt, therefore, we disagree with NNDC statement in (b).</p> <p>Comment noted. Review this area of the plan.</p> |

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|     |      |                          | <p>The policy as it stands raises significant conformity issues with the Development Plan and the Council's statutory duties for the operation of the Housing Allocations Scheme through which affordable housing in North Norfolk is allocated. The statutory guidance on allocations schemes states that "local lettings arrangements must not be used in such a way that there will be a failure to meet the requirement to give reasonable preference to statutorily specified groups", removing up to 25% of affordable homes to rent (and especially if some types of properties which are especially needed in Holt are bound by the policy) is expected to negatively impact on the Council's ability to ensure it is able to provide reasonable preference to those that are entitled to it. The Council has carefully designed the Housing Allocation Scheme so that affordable housing provided on Exception Housing Schemes are subject to the Local Allocations Agreement which provides priority to applicants who have strong local connections to the parish in which a scheme is located and the adjoining parishes. In addition, the Two Stage Allocation Process, allows all</p> | <p>Comments noted.</p>                |

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|     |      |                          | <p>properties not on Exception Housing Schemes or subject to the transfer quota, which are not needed to house an applicant entitled to reasonable preference, to be allocated to an applicant with a local connection in accordance with the Local Allocations Agreement. This approach is already used for all vacancies of affordable housing in Holt and will continue. The inspector is likely to rule that such an approach if left in is in conflict with the Development Plan and undermines the national legislative requirement of the Council.</p> <p>Furthermore if the policy is not amended it is likely that it will also be queried how the decision is made as to which of the affordable homes are subject to this policy and who makes the decision? The selection of properties for being subject to this policy could increase the negative impact of the policy on the Council's ability to meet housing need as it</p> | <p>Comment note.</p>                  |

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|     |      |                          | <p>could remove those properties which are most needed to meet the housing need in Holt. The Council identifies what affordable housing in terms of the size and type of homes are needed to meet housing need in Holt and address existing shortfalls in provision.</p> <p>The implementation of the policy would be complex with affordable homes to rent on the same scheme having different allocation criteria, this is likely to cause confusion which could lead to incorrect allocations being made, especially as the proposed local lettings cascade is out of step with the Local Allocations Agreement which is built into the Council’s Housing AllocationsScheme and which provides a consistent approach to local housing need allocations.</p> <p>If the policy is retained the Council’s Housing specialist advises the following changes are needed:</p> <ul style="list-style-type: none"> <li>• The policy refers to up to 25% of affordable housing to be made available to people on the Council’s ‘Housing Register’ – if this policy is retained this should refer to the ‘Housing List’.</li> </ul> | <p>Comments noted.</p> <p>Comment noted. Reword ‘Housing Register’ to the ‘Housing List’.</p> |

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|     |      |                          | <ul style="list-style-type: none"> <li>Clarification of the minimum percentage or number of homes which should be captured by the policy is needed. The wording of up to 25% creates uncertainty, would a scheme delivering 1% such local homes be acceptable? Who would make the decision as to whether the proposed percentage is acceptable?</li> </ul> | <p>Comment noted.</p>                 |

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|     |      |                          | <ul style="list-style-type: none"> <li>Clarification of the local connection criteria is required. For example to have the highest priority how long do you need to have lived in Holt? Is this a day, a year, 2 years? Criteria v) and vi) should be deleted as they are outside the scope of the intention for this policy. People with family connections to Holt should also be eligible.</li> </ul> <p>This however does not negate the principle of how the inspector will review the policy approach in the</p> | <p>The criteria, as defined in HNP Policy 4, does not require any further clarification. The criteria of the highest priority is to be a "resident of Holt", there is no time requirement as to how long – just that the person is a resident of Holt.</p> <p>Criteria (v) and (vi) are required for completeness and to enable NNDC to complete the allocation under this policy. There could be a situation, however unlikely, where affordable housing is made available under this Policy for local people on the Housing List but, for whatever reason, they do not take up the available affordable home. Criteria (v) and (vi) would then enable NNDC to complete the allocation.</p> <p>Comments noted. Review as necessary.</p> |

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|     |      |                          | <p>first case. Nor remove the conformity issue.</p> <p>An alternative local policy suitable for a NP policy would be to have a permissive policy for provision of further Exception Housing Schemes on sites outside the existing settlement boundary of Holt which could then be subject to a local lettings requirement and it is suggested that the Council's Local Allocations Agreement is used to determine local connection and the degree of priority based on strength of local connection. This would also</p> | <p>Comment noted.</p> <p>Policy HO3 - Affordable Housing in the Countryside - clearly sets out the requirements for Exception Sites and the HNP does not need to replicate this. TheHNP Policy 4 would supplement Policy HO3 by providing the criteria prioritisation for allocation.</p> <p>Review as necessary.</p> |

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|     |      |                          | <p>create consistency for any new Exception Housing Scheme with the existing Exception Housing Scheme which serves Holt and the adjoining parishes.</p> <p>The NP has in its powers the ability to allocate such sites in addition to the strategic sites allocation process that is being brought forward through the Local Plan review.</p> <p>As above the council can assist in the development of such a policy.</p> | <p>Comment noted. It has been decided notto allocate additional sites for development, as Holt has enough already.</p> <p>Comment noted.</p> <p>Comment noted. Date to be added.</p> <p>Comment noted.</p> <p>Comment noted. Document will be added as an appendix.</p> <p>Comment noted.</p> |
|     |      | Page 30                  | 30.<br>8.12 The table 'figure 1' needs a date for when the figures pertain to   |   |
|     |      | Page 32                  | 31.<br>8.16 Provides a figure of '86% increase'. It is unclear what this means in terms of number of people i.e. how many to how many?  |   |
|     |      | Page 32                  | 32.<br>8.20 Refers to the 'principles' of dementia friendly communities. It would be helpful to list what the principles are. A copy of the Document should also be made available as part of the evidence base and / or web link provided.   |   |
|     |      | Page 34                  | 33.<br>8.26 Policy H02 of the adopted Development Plan requires 45% affordable  |   |



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|     |      |                          | <p>housing, subject to viability and the reference to viability needs to be added to this paragraph.</p> <p>The policy also is aligned to national policy on 10 or more dwellings - the para needs to be amended to reflect the Development Plan policy HO2 correctly.</p> <p>Please note specific viability evidence has been commissioned to inform the Local Plan review of this policy.</p>   | <p>Comment noted.</p> <p>Comment noted.</p>   |
|     |      | Page 34                  | 34.<br>8.28 - delete reference to 'reasonable preference criteria' in wording about the Housing Options Register  |   |
|     |      | Page 34                  | 35.<br>8.24 Typo line 4 remove 'the' from '...scale in the locating...'   | Comment noted. Delete the word "the".   |
|     |      | Page 34                  | 36.<br>8.28 -the SHMA reference needs to include the year it was produced and should detail the time line the figure refers to. It is different from the HNP time line and differs between versions. The figure quoted is from an older version and is not the most up-to-date evidence – update to reflect the 2017 SHMA - <b>the OAN is 8,581</b> not 10,067 which is a longer time period and reported in an earlier draft. Additional text should be added that the Council will use this to inform | Comment noted. 8.27.The SHMA 2015 identified the 10,067 OAN between 2012 to 2036. The updated version of the Central Norfolk Strategic Housing Market Assessment 2017 Report of Findings (June 2017) identifies an OAN of 8,581 from 2015 to 2036. The HNP will be update as suggested. |

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|     |      |                          | <p>the setting of a housing target which may be higher.</p> <p>Note the Government have consulted on a revised housing needs methodology and it is expected that once published the required methodology could result in a higher OAN being identified.</p> | <p>Comment noted. As Government have consulted on a standard method for calculating housing need and, once the new NPPF is published later this year, there may be a requirement for NNDC to amend the housing need number again.</p> |
|     |      | Page 34                  | 8.28 Typo – full stop required at end of last sentence.   | Comment noted. Will add a full stop.  |
|     |      | Page 35                  | 37.<br>8.30 – text would need to be amended to reflect the required policy review   | Comment noted. Text will be added to explain further how Policy 4 is operated to assist NNDC in its appropriate implemented.  |
|     |      | Page 35                  | 38.<br>8.31 – reference to ‘some people’ – whatdoes this mean – is there a better way of saying this?   | Comment noted. Will be reworded.  |
|     |      | Page 37                  | 39.<br>8.38 Lists 13 documents which it states ‘support’ Policies 1, 2, 3 & 4. Use of the word ‘Support’ is misleading. Perhaps could use ‘inform’  | Comment noted. It is felt that these documents do support the policies in theHNP.   |
|     |      |                          | Some of the titles of the listed documents are not provided in full and / or do not state the year of publication. As above, quotesused have been incorrectly referenced. The documents and the necessary facts used in the NP should be checked.           | Comments noted. These will be check and updated as necessary.   |

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|     |      | <p>Page 49, 56, 63 and 68</p> <p>Page 39 and every policy</p> | <p>There is no indication given of where people can view these documents. At least 2 of these are not available using a google search.</p> <p>As stated above, all supporting documents used should be made available to the public through the HNP website or links added to where they can be found. These inform the plan so it is reasonable to allow those commenting on it to judge if the evidence is being used correctly and for the NP group to provide transparency in the plan making process</p> <p>This matter is repeated on pages 49 (9.28), 56 (10.19), 63 (11.20) &amp; 68 (12.20)</p> <p>40.<br/>8.40 'Core Spatial Planning Core Aims' not sure what this is meant to refer to – possibly should say 'North Norfolk Core Strategy Core Aims and Objectives' – This wording is used after each policy and will need to be amended accordingly. Such a statement here is also not required and is superfluous.</p> | <p>Comments noted.</p> <p>Comment noted. An appendix will be added to identify links to where these documents can be found.</p> <p>Comments noted. Will be check and updated as necessary.</p> <p>Comments noted. The word Core is not needed and will be deleted. Section 6.5 set out the Core Strategy Spatial Vision and details the Core Aims and how they could be applied to Holt.</p> <p>It is useful to demonstrate how the HNP Policies link back to and support the delivery of the Core Strategy Spatial Vision and Core Aims.</p> |

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|     |      |                          | <p>At any submission stage there is a requirement to demonstrate in the Basic Conditions Statement how each policy is seen to be in conformity. The correct document to refer to and to use in formulating the HNP policies is theconformity guidance note published on the NNDC website – link provided earlier in this review.</p> <p><b>ENVIRONMENT</b></p> <p>41.<br/>9.6 Typo line 3 insert 'and' after 'pine'</p> <p>42.<br/>9.11 Typo line 1 'north Norfolk' should read 'North Norfolk' Consider rewording as it is unclear how new footpaths and cycleways 'aid wildlife movement'. Green corridors, which would allow for the movement of wildlife as well as people, may include footpaths/cycleways but should also incorporate other green infrastructure (e.g. trees, hedgerows, grassland etc.)</p> <p>43.<br/>9.12 repeats paragraph 9.2</p> <p>44.<br/>Typo line 2 'hall' should read 'Hall'</p> <p>45.<br/>The Holt Conservation Area Map under 9.17 is out of date and does not reflect the</p> | <p>Comment noted.</p> <p>Comment noted. Will be added.</p> <p>Comment noted. Text will be reworded to emphasise it is green corridors and the linkages that are important to the movement of wildlife.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted. A new map showing the revised boundary will be added.</p> |

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|     |      | <p>Page 48<br/>Policy 5</p> <p>Page 50<br/>Policy 6</p> | <p>boundary revisions made as part of the review concluded in 2010; i.e. three areas were removed from the boundary at this time. In order to prevent the inspector from removing superseded information this map will need to be updated and reflect the current position.</p> <p>47.<br/>Important open space. For planning purposes, it is important to undertake a review of the open space to determine their special / important qualities. What is the underlying evidence supporting table 1? How has the list of important open spaces been determined and qualified? The starting point is no doubt consultation feedback but the sites then need to be assessed.</p> <p>48.<br/><b>Policy 6</b> This is duplication of CS Policy CT1 and, as currently worded, is not required in the NP. See first General Comment on duplication above. If the NP wishes to include a policy on Open space then it should be locally specific and not duplicate the existing policy.</p> <p>For example It is not clear what <i>'demonstrated that the benefit to the local community outweighs the loss'</i> means. The policy instead could list the, criteria that</p> | <p>Comments noted. The review NNDC are referring to is only necessary if designation as "Local Green Space" is sought through the neighbourhood planning process. No such designation as "Local Green Space" is being requested, as defined in the NPPF.</p> <p>All of these areas have been identified by residents and stakeholders as being important areas to Holt and the wellbeing of the community.</p> <p>Comments noted. Core Strategy Policy CT1 is a district wide policy, is not specific to Holt and does not identify specifically the areas within Holt for protection.</p> <p>Whereas, the HNP Policy 6 is specific to Holt and does identify the actual locations within Holt. Therefore, it is not a duplicate – instead it is seen as being complementary.</p> <p>Comment noted. It is for any developer through their proposals to make the case that the community benefit is of a level that gains the community support.</p> |

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|     |      | Page 51<br>Policy 7      | <p>should be used by an applicant to measure this? And be locally specific.</p> <p>49.<br/>Policy 7 – section 66 of the Planning (Listed Buildings &amp; Conservation Areas) Act, 1990 as amended requires heritage assets to be preserved not protected. Change policy heading – delete protection and replace with preservation (to accord with legislation and NPPF).</p> <p>As worded the policy focuses quite narrowly on listed buildings. Heritage is much broader than this and covers all traditional properties within the area (whether they be listed, locally listed or not listed). It also is inextricably linked to conservation areas</p> | <p>The NPSG felt very strongly that any planning gain should demonstrably demonstrate how the local community will benefit if the open space is lost.</p> <p>Comments noted. In the NPPF, paragraph 7, in defining sustainable development states</p> <ul style="list-style-type: none"> <li>• <b>an environmental role</b> – contributing to protecting and enhancing our natural, built and historic environment;</li> </ul> <p>Therefore, the NPPF talks about “protecting” the “historic environment”.</p> <p>The Core Strategy Policy EN8 is called “Protecting and Enhancing the Historic Environment”.</p> <p>Comments noted. Core Strategy Policy EN8 is focused on designated assets, whereas the amended HNP Policy 7 also raises the importance of non-designated assets.</p> |

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|     |      | <p>Page 52</p> <p>Page 55</p> | <p>which are covered under the previous theme. Due to this narrowness the policy issue is already covered in the existing Development Plan policy EN8, it is also in part a duplication of HNP policy 1 and is not necessary on both counts (as it is duplication). <b>The Council advise that areas of duplication should be reviewed and removed prior to submission. Areas of duplication are one of the examiners tests and it is highly likely that such as policy will be deleted.</b></p> <p>Holt benefits from a distinctive commercial offer which comprises small scale retail outlets and gallery spaces. This aligns quite nicely with the Georgian architecture and the general ambience and thus helps set the town apart from some of its competitors. It would therefore be reasonable to expect that any additional policy on heritage is tailored specifically to the Local identity of Holt. It is recommended that these unnecessary policies are rewritten to specifically value and preserve/enhance these qualities - again giving the document more of a bespoke feel and local purpose.</p> <p><b>Tourism and employment</b></p> <p>50.<br/>10.2 line 2 – Typo ‘north Norfolk’ should read ‘North Norfolk’</p> <p>51.<br/>10.15 The text <i>new employment in the</i></p> | <p>Comments noted.</p> <p>Comment noted. Text will be amended.</p> <p>Comments noted.</p> |

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|     |      | Page 54                  | <p><i>countryside will be supported where it can be demonstrated it would make a positive contribution to the conservation area?</i> What is meant by this – the conservation area covers the town, it reads like a policy but is not a policy as it is in the body of the document. The supporting text goes on to require applications to be assessed against criteria set out for the protection of the character and appearance of Holt. However, no such criteria are detailed.</p> <p>Any policy should be written to include an action and in this case require a proposal to demonstrate the potential amount of impact on the town centre. This then raises the acceptable amount of impacts. Any acceptable level will need to be in line with the NPPF and be backed by appropriate evidence. Overall this approach runs the risk of being considered unreasonable.</p> <p>52.<br/>10.9 The referenced study requires the year to be included in order to accurately identify it. The study, as part of the evidence, should be made available on the HNP web site or at least a link provided to the NNDC web site where it is published.</p> | <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted. The year will be added to the text.</p> |



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|     |      | Page 57<br>Policy 8      | <p>Clarification – although the Aldi store has not come forward there is an extant planning permission for retail development on the site. The section should be updated to reflect that rather than the specific end user.</p> <p>53.<br/>Policy 8 - This policy appears to duplicate existing Development Plan policies EN4, EN9, EN13, EC1, EC3 and conflicts with SS2 and EC2 – it does not add any local distinctiveness to the Development Plan policies. As such it is likely that the inspector will delete such duplication.</p> <p>The first part of the policy (the intro) which details the requirement to comply with the HNP and Development Plan is again superfluous as determination of any planning application must be in</p> | <p>Comment noted. Add to the text the position of the planning permission.</p> <p>Comment noted.</p> <p>Comment noted. Although it must be noted that a number of the Core Strategy policies also reference other policies. It is felt important to remind a developer that the support will only be given where the</p> |

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|     |      |                          | <p>accordance with the Development Plan unless material considerations indicate otherwise.</p> <p>The use of 'unacceptable' is difficult to measure. Would suggest this is changed to 'significant'.</p> <p>It is not clear what would constitute a 'negative effect' or how this would be measured. It should be clearer on what is expected of developers and how the policy should be interpreted; as written it will be ineffective as it details no specific operational or measurable criteria.</p> <p>National guidance states that <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. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared."</i></p> <p>Paragraph: 041 Reference ID: 41-041-20140306"</p> <p>As it stands there is a distinct risk that the policy will be deleted by any inspector.</p> | <p>requirements of other policies, both in the HNP and Development Plan have been met. Paragraph 7.1 of the HNP states this.</p> <p>Comment noted. Replace with significant.</p> <p>Comment noted.</p> <p>Comment noted.</p> |

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|     |      | Page 58<br>Policy 9      | <p>54.<br/>Policy 9 - again a duplication of a strategic policy – a NP needs to reflect the published guidance sheet on strategic conformity inline with the PPG guidance issued by DCLG. The existing Development Plan details the acceptable locations of tourism development in the principle settlements through policy EC 7 and requires a sequential assessment of sites in the countryside. Policy 9 does not add any local distinctiveness to this policy and will be ineffective. Consider deletion, re wording or the identification of a specific suitable and available site for allocation.</p> <p><b>Leisure and Tourism</b></p> | <p>Comment noted.</p>   |
|     |      | Page 59                  | <p>55.<br/>Figure 4 requires a date for when the data relates to and would benefit from adding the source link.</p>  | <p>Comment noted. Date will be added.</p>   |
|     |      | Page 60                  | <p>56.<br/>11.5 line 4 – Typo remove 'a' from after 'of'</p> <p>11.9 confusion here with earlier section on open space</p>   | <p>Comment noted: Amend text.</p> <p>Comment noted, although it should be noted that open space and leisure activities both improve wellbeing.</p>  |
|     |      | Page 63<br>Policy 10     | <p>57.<br/>Policy 10 - The policy has no operational element that would require additional facilities to be provided and is therefore ineffective. As worded it is an aspiration and contains no policy mechanism to achieve it.</p>   | <p>Comment noted. Core Strategy Policy CT3 is non-specific about what it supports. While the HNP Policy 10 specifically lists recreational space (formal and informal), sports facilities, cultural activities, and</p> |

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|     |      | <p>Page 65</p> <p>Page 66</p> <p>Page 68<br/>Policy 12</p> | <p>Policy CT3 of the Development Plan supports provision of community facilities and is aligned with the NPPF para 70. This policy is therefore seen as duplication.</p> <p>In order to add local distinctiveness the policy could be revised to include specific community facilities that could be provided / supported in light of growth; i.e. the evidence should include a review of existing facilities and the requirement for additional facilities in line with a national methodology. The policy could also add local detail through focussing on what to do in the event of a loss of any facilities through a specific proposal; e.g. alternative facilities of better quality, improved access etc. should be provided. However care will be needed not to duplicate existing Development Plan policies.</p> <p><b>Infrastructure</b></p> <p>58.<br/>12.2 – delete ‘and via a S106 agreement / S278 agreement’ as ‘through planning obligations’ already covers this. □ Typo – delete ‘a’ after ‘of’ in line 3</p> <p>59.<br/>12.14 – Typo line 4 – insert ‘are’ before ‘currently’</p> <p>60.<br/>Policy 12 - The aspiration is welcomed, however caution is advised – as reads as if</p> | <p>additional car parking near the town centre. Therefore, not a duplication and is also aligned with paragraph 70 of the NPPF.</p> <p>Comments noted. See earlier response, This policy does not duplicate, the HNP Policy 10 does include specific facilities – such as “additional car parking near the town centre”.</p> <p>Comment noted. S106 and S278 are specific agreements that provide commitment for delivery. The “a” will be deleted.</p> <p>Comment noted. Text will be updated.</p> <p>Comment noted.</p> |

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|     |      |                          | <p>such applications came forward that all such application would be supported regardless of any impacts and location - is this what is intended? What if an application came forward for the next generation of mobile technology 5G? These use higher frequency radio bands which travel less well than existing 4G and will require further booster stations to ensure adequate coverage. Should the policy review where and how such infrastructure could be located? E.g. it could comment on appropriate issues in the conservation area.</p> <p>What is meant by 'superfast broadband'?</p> <p>Note as a requirement of building regulations (as of 1st January 2017) there is a requirement for new buildings to have physical infrastructure to support high speed broadband (&gt;30Mbps). However, it remains that there is no requirement to provide external or site wide infrastructure beyond the access point. Improving broadband is often a commercial decision, however the HNP could explore ways in which site wide infrastructure is provided at the time of development in order to bring improvements and to align with the objective and ensure new development is provided with high speed connections at occupation.</p> | <p>Comment noted. In the Glossary under Broadband, Superfast Broadband is defined as - speed of over 24Mbps.</p> <p>Comments noted.</p> |

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|     |      | Page 69<br>Policy 13     | <p>61.</p> <p>Policy 13 - As worded the policy does contain some local distinctions from the existing Development Plan policy CT5 in that it requires some enhancement of existing networks and does add some local flavour. However, there are other areas that the policy seems to add no value or local distinction and could be considered as disproportionate.</p> <p>The NPPF however, stipulates that proposals cannot be refused on transport grounds unless the residual cumulative impacts of development are severe. The NPPF states that a Transport Statement or Transport Assessment is required where a development will generate significant amounts of movement. Any policy needs to identify which type of submission is required. It is questioned how and why the threshold of 11 or more dwellings and all commercial development has been arrived at. Is this supported by evidence? And has the Highway authority been involved in the development of such an approach.</p> <p>The adopted NNDC validation list currently includes the requirement to provide a transport statement as between 50 -100 dwellings and a full transport assessment for proposals over 100 residential units. There are also varying thresholds for different amounts of types of commercial development and of commercial floor</p> | <p>Comment noted. Reword the Policy.</p> <p>Comments noted. Eleven new dwellings, as this number is seen as generating c88 vehicle movements per day (using the NCC Highways 'rule of thumb' that each new dwelling will on average generate 8 movements per day) and the number of movements a commercial development will create is not dependent on its size but, instead, on the commercial activity. By quantifying the level of traffic movements the degree of impact in any given area on the local transport network can then be understood and the requirement for mitigation measures accessed.</p> <p>Comments noted. Please see response above. The requirement to provide the transport statement and full transport assessment is unaltered by Policy 13 of the HNP. There is great concern that combinations of smaller developments can create issues in the transport network. By identifying the volume and its effect local</p> |

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|     |      |                          | <p>space. Any policy should align to these requirements which are informed by NCC as the Highways statutory body and form part of the Councils adopted policy.</p> <p>If all new development needs to comply with this policy then, as currently worded, even a development of one dwelling would be required to provide a footpath/cycleway or public transport improvement; this is not reasonable and disproportionate. Is it what is intended?</p> <p>Similarly there are large variations in Use Class and scale of commercial development which could be located throughout the district under the banner of commercial development. Requiring “all commercial development” to contribute / provide various assessments is unrealistic and disproportionate.</p> <p>Once the assessment is undertaken, how is the assessment to be used in the determination of planning applications. The NPPF only requires refusal where it is proven the cumulative effects are severe. It is therefore considered the requirement is potentially onerous and disproportionate and runs the risk of failing the Basic Condition tests.</p> | <p>‘hot spots’ will be avoided.</p> <p>Comment noted. Will be reworded.</p> <p>Comment noted.</p> <p>Comment noted. Guidance is provided by the NPPF, paragraphs 29 to 41 and paragraphs 186 and 187 on how decisions should be taken.</p> |

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|     |      | Page 69<br>Policy 14     | <p>The policy calls for any such assessment to include surrounding parishes. The neighbourhood plan jurisdiction is confined to the defined NP area and any requirement to apply a policy outside is beyond the jurisdiction of the plan and runs the risk of deletion.</p> <p>Overall and on balance it is considered that this policy is not a justified or effective policy and should be deleted or converted into supporting / aspirational text. The assessment of traffic is part of the process in determining a planning application. Any such assessment is provided by the statutory highway body as part of the normal process in line with national policy.</p> <p>62.<br/>Policy 14 is not a policy as currently worded, it is an aspiration; there is no mechanism to be applied. A general policy encouraging community facilities is not necessary as this would be dealt with under existing Development Plan policies. The inspector is likely to find it is not required.</p> <p>If it is intended to give further encouragement specifically to healthcare and educational facilities then a different policy approach would be needed, e.g. setting out the reasons for exception to the general policies. Specific justification would be needed for this.</p> | <p>Comments noted. Policy 13 asked for the cumulative effect – where other development is known and likely to impact on the traffic movements in the Holt Neighbourhood Area then it needs to be included as part of the baseline of traffic movements before adding on the new development in the Holt Neighbourhood Area. If this is not used as the starting point a new development could be identified as causing a significant impact when that effect was already caused by another development and the new proposals were just adding to an existing problem – which would be unfair on the new proposals, as it should only be required to mitigate against the impact it is likely to cause and not an existing problem.</p> <p>Comment noted, although Policy 14 is related to healthcare facilities – not community facilities.</p> <p>Comment noted, although Policy 14 related to healthcare facilities – not educational facilities.</p> |



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|     |      | <p>General</p> <p>Page 71</p> | <p>FYI the identification and provision of additional healthcare and associated health infrastructure is the responsibility of Health service providers. In conjunction with the CCG / NHS England the local health practice identify growth requirements in order to support residential growth. The Council have signed up to a Norfolk Wide Health Protocol along with NHS England and the North Norfolk CCG. Applications are consulted on with the relevant healthcare providers. A s106 contribution has been collected for health care improvements in association with recent larger scale planning permissions in Holt as requested by the local providers. It is an ongoing commitment and part of the Development Plan. However it remains up to the health providers to identify the need and decide how the monies are spent.</p> <p>63.<br/>Infrastructure section General – given the aspirational nature and duplication of most elements of policies in this section would it not be better to undertake a full review of the existing Development Plan policies and seek to provide one NP policy covering local aspects which can add some meaningful value to the existing policies rather than seeking to duplicate the general existing policies?</p> <p><b>Delivery , implementation and Monitoring</b></p> <p>64.</p> | <p>Comments noted.</p> <p>Comments noted.</p> |

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|     |      | Page 73                  | 13.15 line 2 – Typo – amend ‘maybe’ to ‘may be’   | Comment noted.   |
|     |      | Page 74                  | 65.<br>Description of ‘Broadband’ explains speeds of broadband. – This should be in the policy. Could include description ‘a high-capacity transmission technique using a wide range of frequencies, which enables a large number of messages to be communicated simultaneously’. | Comment noted. Will add to definition as suggested.  |
|     |      | Page 76                  | 66.<br>Description of ‘Brownfield land or Previously Developed Land’ only cites part of the definition from the NPPF. Amend text to include the whole definition so that it is understood what land is excluded.  | Comment noted. Will be updated as suggested.   |
|     |      | Page 76                  | 67.<br>Description of ‘greenfield land’ – states ‘does not include residential garden land’ – this is not entirely correct. Amend text to reflect actual situation.   | Comment noted. It is understood that residential gardens are not classed as greenfield land – as they would be classified as infill development. |
|     |      | Page 76                  | 68.<br>Description of ‘Listed Building’ In line 1 second sentence; the correct order of importance for the grades is ‘I, II* or II’ rather than ‘I, II or II*’  | Comment noted. Will alter order as suggested.  |
|     |      | Page 77                  | 69.<br>Description of ‘Permitted Development’ – correct citation of the legislation is ‘The Town and Country Planning (General  | Comment noted. Will be updated as suggested.   |

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|     |      | Page 78                  | <p>Permitted Development) (England) Order 2015’ – amend the text</p> <p>70,<br/>Definition for settlement boundary - is poor and should be amended. A settlement boundary is a line that is drawn on a plan around a settlement, which reflects its built form, it is a policy tool reflecting the area where a set of plan policies are to be applied. This could include policies within your Neighbourhood Development Plan.</p> <p>In general, there is a presumption in favour of development within the settlement boundary. Any land and buildings outside of the boundary line are usually considered to be open countryside where development would be regulated through other policies of the Development Plan</p> | <p>Comment noted. Will be reworded.</p>                              |
|     |      | Page 79                  | <p>71.<br/>‘SPD’ – update definition - it is a document that adds further detail to the policies in the “Local Plan”. SPD’s can be used to provide further guidance for development specific issues; they are a material consideration in planning decisions.</p>  | <p>Comment noted. Will update with the definition from the NPPF.</p> |
|     |      | SA Report                | <p><b>Sustainability Appraisal</b></p> <p>72.<br/>It has been previously advised that the production of an SA is not a requirement of the neighbourhood plan process, as detailed in the PPG, and can confirm that</p>   | <p>Comment noted.</p>  |

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|     |      |                          | <p>given the general content of the emerging plan the production of an SA has limited value. Through the Basic Conditions Statement there is requirement to demonstrate how the HNP contributes to sustainable development, although an SA can sometimes assist in this case, given the generality of the policies it is seen as disproportionate and an obvious and unnecessary onerous task. The SA document is not an examination document itself and although it contains a number of serious errors and omissions, given that the examination will focus on the Basic Condition tests and not the SA, it is considered that a full critique does not warrant the resource necessary, especially as previous detailed commentary has been given.</p> <p>That said as the steering group have decided to continue in the production of an SA and given that the legislation requires that it is iterative and used to inform plan development, the SA should be kept up-to-date and re published at each consultation stage. The previous comments on the scoping report provide a starting point. Going forward the document should be updated to incorporate the information previously supplied. It would also be expected that the comments supplied at the time of previous consultation are in any case detailed along with the other statutory bodies' replies and a response justified in the</p> | <p>Comments noted.</p>                |

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|     |      |                          | <p>required Consultation Statement at any submission stage.</p> <p>If the intention is to use the SA report to demonstrate that the HNP contributes to sustainable development, <b>as a minimum the SA objectives need to be expanded to include the full 16 SA objectives of the Local Plan</b> - otherwise how can it be used? These have previously been sent to the steering group / consultant tasked with the production of the HNP but should you require an additional copy please get in touch.</p> <p>As advised in correspondence on the 17.11.17 an alternative approach would be to use the full framework but to develop a simpler matrix SA rather than a full blown appraisal of all the policies. It is considered that this would be a much more cost effective, proportionate and simpler approach and considerably less work and broadly acceptable in demonstrating sustainability objectives. The matrix could then help address one of the basic conditions tests without repeating the inaccuracies contained in the SA as well as keeping down the town council's costs.</p> <p><b>Compliance with the SEA Directive.</b><br/>73.<br/>As previously advised and to avoid any ambiguity it is the Council as the Local Planning Authority and as the responsible</p> | <p>Comment noted.</p> <p>Comment noted.</p> <p>Comments noted.</p> |

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|     |      |                          | <p>body under regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004, that has to satisfy itself that the regulations have been adhered to.</p> <p>It was agreed that as part of the support offered to HNP at the meeting on the 08.11.17 that a screening opinion would be requested from the Council once the policies of the plan had become known. This would be done through the submission of a screening report detailing the environmental considerations such as the locations, type and characteristics of the relevant European designated sites. E.g. Holt Lows SSSI, Holt Lows and Valley Fens SAC, County Wildlife Sites, country parks, ancient woodlands, Public Right of Ways, priority habitats etc. Much of this information can be obtained from Natural England and "magic maps".</p> <p>The Council as the responsible body will review the information provided and consult on its determination and the provided evidence with the statutory bodies.</p> <p>The SA report includes an attempt at a screening determination which appears to be the same version consulted on at the time of the SA scoping documents (as detailed in text page 29 of the SA). This was undertaken prior to developing any of the HNP policies and the detailing of any of the</p> | <p>Comment noted.</p> <p>Comment noted. As the 'Qualified Body', the Town Council, has consulted with the statutory bodies.</p> <p>Comments noted.</p> |

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|     |      |                          | <p>known environmental considerations that need to be taken into account.</p> <p>Furthermore the responses of the three bodies listed, plus the County Council and NNDC, have not been provided in order for HNP to demonstrate to NNDC as the responsible body that the regulations have been applied and adhered to.</p> <p>At this stage the Council remains to be convinced that the screening determination is robust or based on any knowledge of the relevant considerations and is not satisfied that the regulations have been fulfilled.</p> <p>The legislative requirement placed upon the Council to satisfy itself that the SEA has been complied with and the NP regulations at submission stage of a neighbourhood plan require that the Council's must satisfy itself that the required documents have been provided, are in the correct format and contain the level of detail to enable publication, public participation and examination.</p> <p>In order for both HNP and the Council to meet the respective legislative requirements and obligations it is considered that the steering group submit the required screening report and request an up to date</p> | <p>Comments noted.</p> <p>Comments noted.</p> <p>Comment noted.</p> |

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|     |      |                          | <p>and robust screening opinion from the Council, as previously agreed. The screening opinion is an examination document and will be required in order to proceed. It is suggested that given the potential for significant amendments to the emerging plan that this request is received following further work on the policies but prior to final submission of the NP.</p> | <p><b>Proposed action:- Comments noted and the following changes to the HNP will be made:</b></p> <p><b>Page 2: Deleted the second "Council".</b></p> <p><b>Map 1: Replace or resize.</b></p> <p><b>1.2: Replace the word "protect" with "preserve".</b></p> <p><b>2.1.1: Update the text in the last sentence to "The HNP cannot prevent allocated development in Holt although it can influence future planning permissions for the benefit of Holt, its residents and those who visit.</b></p> <p><b>2.3.1, 2.3.2 and 2.3.5: Ensure the referencing of the "A Vision for Holt" is consistent throughout.</b></p> <p><b>2.4.3: Replace "processes" with "process".</b></p> <p><b>2.10.2: Replace "Local Plan" with "Development Plan".</b></p> <p><b>6.1: The term "Local Development</b></p> |



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|     |      |                          |                   | <p><b>Framework” will be replaced with the term “Local Plan”.</b></p> <p><b>6.1.1: Add “North Norfolk Proposals Map 2008” to the list.</b></p> <p><b>7.2: Update the text to read “...results of the earlier consultations, ...”</b></p> <p><b>8.12: Add Census 2011 to text and Figure 1.</b></p> <p><b>8.16: Insert additional text to read “...86% (c26,937)...”.</b></p> <p><b>8.20: Add ‘At a Glance: a Checklist for Developing Dementia Friendly Communities’ as an appendix.</b></p> <p><b>8.23: Add additional text after 8.22. to recognise the Core Strategy Policy HO1 and the good work NNDC is doing in seeking to address the imbalance in the housing stock. The provision of smaller will also target another issue for Holt – affordability.</b></p> <p><b>8.24 : Delete the word “the” between “in” and “locating” in the fourth line.</b></p> <p><b>8.27: Update the text to read “The Central Norfolk Strategic Housing Market Assessment Report of Findings (June 2017) identifies the Objectively Assessed Need (OAN) for Norfolk and the individual Districts, for North Norfolk a total of 8,581 dwellings have been identified as the OAN from 2015</b></p> |

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|     |      |                          |                   | <p>to 2036. NNDC will use this figure to inform the setting of a housing target which may be higher.”</p> <p>8.28 : A full stop at the end of the sentence.</p> <p>8.29 : Add more details to text to explain how the 25% is needed for local connection.</p> <p>8.30 : Add more text to explain in more details how the calculations for identifying local needs and the percentage of affordable homes allocated through this Policy 4.</p> <p>8.31 : Amend wording to replace “..some people...” with “...those in need...”</p> <p>8.38: Add “2012” to the NPPF. And amend ‘The Holt Vision’ to “A Vision for Holt (2012)”.</p> <p>8.40: Delete the word “Core” before “Spatial Planning Core Aims”.</p> <p>Policy 1, criteria 4: Delete the word “mains”.</p> <p>Policy 2: Reword policy to “Development proposals should, where possible, include and incorporate the principles of dementia friendly communities (as detailed in “At a Glance: a Checklist for Developing Dementia Friendly Communities, see Appendix 2, or subsequent updates). ”</p> <p>Policy 4: Reword policy from ‘Housing</p> |

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|     |      |                          |                   | <p><b>Register’ to the ‘Housing List’.</b></p> <p><b>9.6: Add the word “and” after “pine”.</b></p> <p><b>9.11 : Amend ‘north Norfolk’ to ‘North Norfolk’ in the first sentence. Replace the second sentence with “Through the consultation events, local residents expressed strong views about improving accessibility. Specifically, green corridors, which would allow for the movement of wildlife as well as people, may include footpaths and cycleways, that can facilitate linkages and access to the countryside but should also incorporate other green infrastructure.”</b></p> <p><b>9.12 : Delete text in 9.12.</b></p> <p><b>9.17: Amend “hall” to “Hall”.</b></p> <p><b>Map 5: Replace map with updated conservation boundary.</b></p> <p><b>10.2: Amend ‘north Norfolk’ to ‘North Norfolk’ in the first sentence.</b></p> <p><b>10.8 : Replace “Local Plan” with “Core Strategy”.</b></p> <p><b>10.9 : Add the year “2017” to the text.</b></p> <p><b>10.9: Add text after the last sentence to say “There is extant planning permission for retail development on the site.”</b></p> |

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|     |      |                          |                   | <p><b>10:15: Add reference to criteria contained in the Core Strategy Incorporating Development Control Policies, the North Norfolk Design Guide, SPD and the North Norfolk Landscape Character Assessment, SPD documents.</b></p> <p><b>Policy 8, criteria 2: Reword to “They are appropriate to a market town and do not have a detrimental impact on the viability of the town centre.”</b></p> <p><b>Policy 8, criteria 3: Replace the word “unacceptable” with “significant”.</b></p> <p><b>Figure 4: Add “Census 2011” to source.</b></p> <p><b>11.5: Delete “a” between the “of” and “planning conditions”.</b></p> <p><b>12.2: Delete “a” after “of” in the third line of text.</b></p> <p><b>12.14: Insert “are” before “...currently” in the last sentence of text.</b></p> <p><b>Policy 13:<br/>Reword second paragraph to “Assessing the potential impact of this traffic and include appropriate and proportionate measures to mitigate any negative impacts on road safety, pedestrians, safe road crossings, cyclists, parking and congestion within Holt.”</b></p> <p><b>Add to the end of the third paragraph</b></p> |

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|     |      |                          |                   | <p><b>"appropriate to their size."</b></p> <p><b>13.15: Replace 'maybe' with 'may be'.</b></p> <p><b>Glossary:</b></p> <p><b>Broadband: Add to definition "a high-capacity transmission technique using a wide range of frequencies, which enables a large number of messages to be communicated simultaneously".</b></p> <p><b>Brownfield Land or Previously Developed Land: Add to definition to read "Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time."</b></p> <p><b>Excluded Development: Add the definition</b></p> |

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|     |      |                          |                   | <p>as defined in the Localism Act 2011.</p> <p><b>“The following development is excluded development for the purposes of section 61J-</b></p> <p><b>(a) development that consists of a county matter within paragraph 1(1)(a) to (h) of Schedule 1,</b></p> <p><b>(b) development that consists of the carrying out of any operation, or class of operation, prescribed under paragraph 1(j)of that Schedule (waste development) butthat does not consist of development of a prescribed description,</b></p> <p><b>(c) development that falls within Annex 1 to Council Directive 85/337/EEC on the assessment of the effects of certain public and private projects on the environment (as amended from time to time),</b></p> <p><b>(d) development that consists (whether wholly or partly) of a nationally significant infrastructure project (within the meaning of the Planning Act 2008),</b></p> <p><b>(e) prescribed development or development of a prescribed description, and</b></p> <p><b>(f) development in a prescribed area or an area of a prescribed description.</b></p> <p><b>Listed Building: Reorder listing grades to read “ I, II* or II”.</b></p> <p><b>Permitted Development: Add to definition “.....”The Town and Country Planning (General Permitted Development) (England) Order 2015.....”</b></p> |

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|                     |   |                          |   | <p><b>Settlement Boundary:</b> Reword to “Is a line that is drawn on a plan around a settlement, which reflects its built form, it is a policy tool reflecting the area where a set of plan policies are to be applied.</p> <p>In general, there is a presumption in favour of development within the settlement boundary. Any land and buildings outside of the boundary line are usually considered to be open countryside where development would be regulated through other policies of the Development Plan.”</p> <p><b>Supplementary Planning Documents:</b> Replace definition with “Documents which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.”</p> |
| <p><b>PS/43</b></p> | <p>Resident<br/>Albert Street<br/>Holt<br/>NR25 6HX</p> |                          | <p>Agree with Policies 2, 3, 4, 5, 6, 7, 8, 9, 10, 12 and 14.</p> <p>Disagree with Policies 1, 11 and 13.</p> <p>Overall do not agree with the Neighbourhood Plan or the Sustainability Appraisal Report.</p> | <p>Thank you for your response and your comments are noted.</p> <p>Your disagreement is noted.</p>   |

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|     |      | Policy 1                 | <p>No.<br/>Too late, as hundreds of new homes have already been approved and are being built.</p> <p>Have the Holt Town Council approved of each and every one?</p>  | <p>Comment noted.</p> <p>This is not something the Town Council are able to give approval off. It is North Norfolk District Council, as the Local Planning Authority, have given consent through granting of planning permission.</p>              |
|     |      | Policy 2                 | Yes.   |  |
|     |      | Policy 3                 | Yes.   |  |
|     |      | Policy 4                 | <p>Yes.<br/>Would this just be for residents of Holt or also for residents of neighbouring villages?</p>   | <p>Comment noted. First priority will go to residents of Holt parish, criteria (i). Through to criteria (v) residents of adjacent parishes.</p>  |
|     |      | Policy 5                 | <p>Yes.<br/>Again TOO LATE, acres of farmland are already being built on.</p>  | <p>Comments noted. The HNP does not seek to allocate any additional housing. This has been allocated by NNDC through the Core Strategy and Site Allocations. The emerging Local Plan is likely to allocate more housing in the period to 2036.</p> |
|     |      | Policy 6                 | <p>Yes.<br/>Again TOO LATE, acres of farmland are already being built on ie. Heath Farm.</p>   | <p>Comment noted, see response above.</p>  |
|     |      | Policy 7                 | <p>Yes.<br/>Historic buildings should be conserved and saved, but unfortunately the town council does not have a good record here as it did nothing to save the last old railway building on the Thaxters/Aldi site.</p> | <p>Comment noted.</p>  |



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|     |      | Policy 8                       | Yes.<br>This will not happen until there is plentiful and mixed parking in the town, with no more on street parking removed and some reinstated. Look after the existing businesses and the people they employ.  | Comment noted.   |
|     |      | Policy 9                       | Yes.   |  |
|     |      | Policy 10                      | Yes.<br>Little seems to be done ie. Church Street where parking has been taken away. This is not good for users of the Church Hall, (even the neighbourhood plan consultant parked on the double yellow lines outside the church hall on the morning of the consultation to unload - he did not want to use the new car park?). It does nothing for the elderly population and their recreations if town centre parking keeps diminishing. | Comment noted. Addition car parking near the town centre has been identified as one of the specific facilities required. |
|     |      | Policy 11                      | No.  |  |
|     |      | Policy 12                      | Yes.   |  |
|     |      | Policy 13                      | No.  |  |
|     |      | Policy 14                      | Yes.<br>Will any of this be in place in time for all the new housing developments?   | Comment noted.   |
|     |      | Overall, do you agree with the | No.<br>Although agreeing with elements of the plan and the general wish to do good for   | Your disagreement is noted.  |

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|     |      | <p>HNP ?</p> <p>Omissions</p> | <p>the town, we do not agree with having the expense of such a document.</p> <p>Not enough focus on the community. It underestimates the significance to the community of the vibrancy and prosperity of the town centre. The shops and businesses in the town are vital to well being of the residents and visitors alike. The needs of the elderly population do not seem to figure highly enough in the plan.</p> <p>It does not take into account the huge addition to the population of the town that is imminent and its subsequent needs. It does not pay heed to the very important need to for better provision of car parking necessary for the struggling businesses in the town - more parking spaces particularly on street in the town centre will help the shops and make them accessible to the elderly and disabled and those with dementia. If the plan does not support the increase in on street parking it is not supporting these people or encouraging employment.</p> <p>Section 12.14 mentions car parking “nibbling away ” at the Shirehall Plain. These spaces have been there for decades, they should not be taken away just to make way for a larger seating area which is not needed and would be detrimental to the prosperity of businesses in this area.</p> <p>There should be no pedestrianisation of any</p> | <p>Comments noted. A number of the HNP policies specifically identifies the town centre in their wording - Policy 8 seeks additional employment provided it does not have a negative effect on the town centre, Policy 10 seeks additional car parking near the town centre and Policy 13 specifically was to improve access to the town centre.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comments noted. The HNP does not seek</p> |

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|       |                     | Do you agree with the SA ? | <p>of Holt’s streets. No more on-street parking taken away.</p> <p>There should be made a priority to survey the on-street parking to evaluate where extra spaces could be made or reinstated by taking away unnecessary double yellow lines. Project List. There seems no mention of a project to improve the parking problem.</p> <p>project no. 6. A market could be detrimental to the prosperity of Holt. Look after the local businesses that are already there.</p> <p>project no 14. what would this entail?</p> <p>No.<br/>Far too tedious to read, far too long and insignificant decisions. Waste of time and taxpayers money.</p> <p>Many residents will be put off filling out the form because of the length of this report.</p> | <p>pedestrianisation of any of Holt or the removal of any of the existing on-street parking.</p> <p>Comment noted. It has been suggested that a ‘one-way’ system is development for the town centre which would enable the extra carriageway / road to be converted into additional parking spaces. It has not been possible to include a policy for this as there is no mechanism to deliver this. Therefore, it has been added to the project list.</p> <p>Comment noted.</p> <p>Your disagreement is noted.<br/>The SA is a technical document to support the HNP.</p> <p>Comment noted, although a large number of people have taken the time to complete their response.</p> <p><b>Proposed action:- Comments noted and no changes are proposed to the HNP.</b></p> |
| PS/44 | Resident Providence |                            | Agree with Policies 1, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13 and 14.   | Thank you for your support. Your comments are noted.   |

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|     | Place<br>Briston<br>NR24 2HZ | Policy 2                 | Disagree with Policy 2.<br><br>Overall agree with the Neighbourhood Plan or the Sustainability Appraisal Report.<br><br>I would prefer that the HNP was totally inclusive for <u>all</u> disabilities. | Support is noted.<br><br>Comments noted. There are already national and NNDC policies that cover this. Ensuring future development proposals are dementia friendly is seen as an important issue. Dementia only looks like a problem that is going to grow in magnitude. |
|     |                              | Policy 3                 | Yes, this is vital.  | Comment noted.   |
|     |                              | Policy 4                 | Yes, Holt needs diversity in its residents.  | Comment noted.   |
|     |                              | Policy 5                 | Yes, Connectivity is vital though.   | Comment noted.   |
|     |                              | Policy 8                 | Although 5 extra Hectares for a businesspark is not much considering all the new houses.   | Comment noted. This is the level identified by NNDC to meet the needs of North Norfolk.  |
|     |                              | Policy 9                 | Yes, very important with parking.  | Comment noted.   |
|     |                              | Policy 10                | Very important the Community Centre has been outgrown, with no parking of its own  | Comment noted.   |
|     |                              | Policy 13                | Yes, but paths & cycleways must 'join up' with accessible parts of Holt.   | Comment noted.   |
|     |                              | Policy 14                | Development of extra facilities vital.   | Comment noted.   |
|     |                              | Overall, do              | Yes.   | Support noted.   |

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|                     |  | <p>you agree with the HNP ?</p> <p>Do you agree with the SA ?</p> | <p>There is an impressive Project list with intentions, I hope they can be implemented sooner rather than later.</p> <p>Yes</p>   | <p>Comment noted. Implementation of these projects will be down to local residents working with the Town Council.</p> <p>Support noted.</p> <p><b>Proposed action:- Comments noted and no changes are proposed to the HNP.</b></p>  |
| <p><b>PS/45</b></p> | <p>Resident Blackthorn Avenue Holt</p> | <p>Policy 1</p> <p>Policy 2</p> <p>Policy 3</p> <p>Policy 5</p>   | <p>Agree with Policies 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 12 and 13.</p> <p>Disagree with Policies 5,</p> <p>Unsure with Policy 14.</p> <p>Overall agree with the Neighbourhood Plan (subject to comments).</p> <p>Yes.<br/>Could it be a requirement that off road parking is provided for all new housing?</p> <p>Yes (subject to comment)<br/>I think this could be expanded to also include consideration of facilities for those whose mobility is impaired, given our demographics</p> <p>Yes<br/>See comments in 2. Also, an elderly population needs access to town parking.</p> <p>No</p> | <p>Thank you for your support. Your comments are noted.</p> <p>Support noted.</p> <p>Comment noted. NNDC already have guidelines to deliver off road parking with new homes.</p> <p>Comment noted. This should already be a design consideration for new developments.</p> <p>Comments noted.</p> |

| No. | Name | Policy / Theme / Section | Response Received   | Neighbourhood Plan Comment and Action   |
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|     |      |                          | As it should be more strongly worded i.e. projects would be favoured that develop new green infrastructure. Also no point about the need to develop new cycleways that can also be used by wheelchair users and motability users. | Comment noted.  |
|     |      | Policy 6                 | Yes (subject to comment)<br>But I think it should explicitly state that such proposals would only be considered in extremely rare circumstances.  | Comment noted. The benefits will need to be very carefully assessed to ensure they are deliverable to the community.              |
|     |      | Policy 8                 | Yes (subject to comment)<br>I think it should be clear that consideration will <b>not</b> be given to developments within the AONB  | Comments noted.   |
|     |      | Policy 10                | Yes<br>Although the words 'near the town centre' appear to restrict it unnecessarily to this area only.   | Comments noted.   |
|     |      | Policy 11                | Yes<br>I would argue that option c should include that the legal arrangement should include arrangements for transfer to a or b in the event of company failure.  | Comment noted. The transfer could be facilitated , the issue will be funding andwho pays for on going management and maintenance. |
|     |      | Policy 12                | Yes<br>Although there is no wording about conflict with other policies i.e. you wouldn't put a mobile phone mast outside Byfords.   | Comment noted.  |
|     |      | Policy 13                | Yes<br>I would add they should work with other  | Comment noted. The NCC Highways   |

| No. | Name | Policy / Theme / Section                                     | Response Received  | Neighbourhood Plan Comment and Action  |
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|     |      | <p>Policy 14</p> <p>Overall, do you agree with the HNP ?</p> | <p>developers in the area to... (need to avoid the situation discussed at council of too many exits to a main road over a small distance as dangerous)</p> <p>Yes/No ??<br/>Does this need to be stronger, i.e. would you allow lots of developments if the healthcare provision couldn't cope???</p> <p>Yes (subject to comments here)</p> <p>Yes some good points here, although I feel more emphasis could be given to improving existing Holt. In particular, for a town with c40% of over 65s, there is minimal consideration for people with mobility issues that use a wheelchair or motability scooter.</p> <p>For example, if the town centre road were one way, it might leave room for some delivery stopping points and for a wide flat cycle path for use by cyclists and wheelchair users. Pavement furniture should be banned. Also I find it appalling that there are not at least two walks with pathways that could be used by these users such as round Spout Hills and to and round the country park. People end up restricted to their homes or they move away from what I've seen.</p> <p>More emphasis should be given overall to enhancing the town and not solely protecting its heritage. A lot of ideas are</p> | <p>Authority will assess proposals and likely to object if this situation does arise.</p> <p>Comment noted. This policy is just about seeking additional healthcare facilities.</p> <p>Support noted.</p> <p>Comment noted. Improving access is something the Town Council is working on.</p> <p>Comment noted. There is a project that has been added to the list to look into a one-way system and if that would deliver benefits (such that you have listed).</p> <p>Comments noted. By listing the projects this will give any future developer a guide to the sort of things that the local community are</p> |

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|                     |   |                          | <p>added on in s14 project list which often relate to this – could the town plan refer to developments needing to contribute to the delivery of items on this or a similar list?</p> <p>I also think that although it is the Holt town plan, consideration should be given to including a statement around pro-actively working with other towns in the area – e.g. Cromer and Sheringham in particular. To me, each town on its own might not be able to support a development, but oneservicing all three might be desirable (anexample could be a cinema / leisure facility near the turn off for Sheringham.)</p>            | <p>seeking to do and want help with.</p> <p>Comments noted. The HNP is restricted to the Neighbourhood Area, which is the entire parish of Holt. Whilst this limits the scope of the HNP it does not stop the Town Council, other bodies and residents working together across a wider area.</p> <p><b>Proposed action:- Comments noted and no changes to the HNP will be made.</b></p> |
| <p><b>PS/46</b></p> | <p>Stewart Patience (on behalf of Anglian Water Services Ltd)</p> <p>Thorpe Wood House,<br/>Thorpe Wood,<br/>Peterbrough,<br/>PE3 6WT</p> | <p>Policy 1</p>          | <p>Thank you for the opportunity to comment on the Pre-submission Neighbourhood Plan. Please find attached a completed response form on behalf of Anglian Water.</p> <p>Reference is made to water drainage solutions and the need to ensure that connections are available prior to the occupation of residential development.</p> <p>We would suggest that the policy shouldrefer to both connections and reinforcement of the foul sewerage network where required and that the policy shouldnot be limited to housing proposals but referto development in the Parish more generally. In addition it would be helpful to</p> | <p>Thank you for your response. Your comments are noted.</p> <p>Comment noted.</p> <p>Comments noted. Policy will be reworded to specifically mention foul water sewerage. The Policy covers 'new' development – this would be both residential and commercial.</p> <p>Thank you for the suggested wording for this Policy, although, if worded as suggested,</p>                       |



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|     |      |                          | <p>clarify that foul drainage and not water supply is being referred to in Policy 1. It is therefore suggested that policy should read as follows:</p> <p><del>water</del> <b>foul</b> drainage solutions (<b>including any necessary reinforcement required for</b> <del>where</del> new <del>homes</del> <b>development</b> being connected to the main sewerage system) to be implemented prior to <del>first</del>-occupation.'</p> | <p>this would prevent the Policy also covering other issues such as surface water run off or other flood risk mitigation identified.</p> |
|     |      | Policy 2                 | <p>Anglian Water has no comments to make relating to Policy 2.</p>  | <p>Comment noted.</p>  |
|     |      | Policy 3                 | <p>Anglian Water has no comments to make relating to Policy 3.</p>  | <p>Comment noted.</p>  |
|     |      | Policy 4                 | <p>Anglian Water has no comments to make relating to Policy 4.</p>  | <p>Comment noted.</p>  |
|     |      | Policy 5                 | <p>Anglian Water has no comments to make relating to Policy 5.</p>  | <p>Comment noted.</p>  |
|     |      | Policy 6                 | <p>Anglian Water has no comments to make relating to Policy 6.</p>  | <p>Comment noted.</p>  |
|     |      | Policy 7                 | <p>Anglian Water has no comments to make relating to Policy 7.</p>  | <p>Comment noted.</p>  |
|     |      | Policy 8                 | <p>Anglian Water has no comments to make relating to Policy 8.</p>  | <p>Comment noted.</p>  |
|     |      | Policy 9                 | <p>Anglian Water has no comments to make relating to Policy 9.</p>  | <p>Comment noted.</p>  |

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|              |   | Policy 10                | Anglian Water has no comments to make relating to Policy 10.   | Comment noted.  |
|              |   | Policy 11                | Anglian Water has no comments to make relating to Policy 11.   | Comment noted.  |
|              |   | Policy 12                | Anglian Water has no comments to make relating to Policy 12.   | Comment noted.  |
|              |   | Policy 13                | Anglian Water has no comments to make relating to Policy13.  | Comment noted.  |
|              |   | Policy 14                | Anglian Water has no comments to make relating to Policy14.  | Comment noted.<br><br><b>Proposed action:- Comments noted and the following changes to the HNP will be made:-</b><br><br><b>Policy 1: Reword criteria 4 to “water drainage solutions and foul water sewerage (including new homes being connected to the sewerage system) to be implemented prior to first occupation;”</b> |
| <b>PS/47</b> | Gladman Developments Ltd<br>Gladman House<br>Alexandria Way<br>Congleton Business Park<br>Congleton<br>Cheshire<br>CW12 1LB |                          | <b>Introduction</b><br>This letter provides the response of specialise in the promotion of strategic land for residential development with associated community infrastructure.<br><br>Gladman has considerable experience in the development industry across a numberof sectors, including residential and employment development. From that experience, we understand the need for the | Thank you for your response. Your input is appreciated and your comments arenoted.  |

| No. | Name | Policy / Theme / Section | Response Received   | Neighbourhood Plan Comment and Action  |
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|     |      |                          | <p>planning system to provide local communities with the homes and jobs that are needed to ensure residents have access to the homes and employment opportunities that are required to meet future development needs of the area and contribute towards sustainable economic growth.</p> <p><b>Structure of representations</b><br/>                     These representations are structured to follow the consultation document and will cover the following key topic areas:</p> <ul style="list-style-type: none"> <li>- Legal compliance</li> <li>- Consistency with the Development Plan</li> <li>- Neighbourhood Plan policies</li> </ul> <p><b>Legal Requirements</b><br/>                     Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the Holt Neighbourhood Plan (HNP) must meet are as follows:</p> <p><i>(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.</i></p> <p><i>(d) The making of the order contributes to the achievement of sustainable development.</i></p> | <p>Comment noted.</p> <p>Comment noted. The Basic Conditions Statement, one of the supporting submission documents, sets out how the HNP meets the basic conditions.</p> |



| No. | Name | Policy / Theme / Section | Response Received  | Neighbourhood Plan Comment and Action                             |
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|     |      |                          | <p>Paragraph 16 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.</p> <p>Paragraph 17 further makes clear that neighbourhood plans should set out a clear and positive vision for the future of the area and policies contained in those plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.</p> <p>Paragraph 184 of the Framework makes clear that local planning authorities will need to clearly set out their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. The Neighbourhood Plan should ensure that it is aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.</p> <p><b>Planning Practice Guidance</b></p> | <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted.</p> |


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|     |      |                          | <p>It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements for the wider area as confirmed in an adopted development plan. The requirements of the Framework have now been supplemented by the publication of Planning Practice Guidance (PPG).</p> <p>On 11th February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan.</p> <p>On 19th May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG. These updates provide further clarity on what measures a qualifying body should take to review the contents of a neighbourhood plan where the evidence base for the plan policy becomes less robust. As such it is considered that where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the qualifying bodies anticipated timescales in this regard.</p> <p>Further, the PPG makes clear that</p> | <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted.</p> |

| No. | Name | Policy / Theme / Section | Response Received  | Neighbourhood Plan Comment and Action                             |
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|     |      |                          | <p>neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded.</p> <p><b>Relationship to Local Plans</b><br/>                     To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan. The adopted Development Plan relevant to the preparation of the HNP is the North Norfolk Core Strategy adopted in 2008 with minor updates being made to the Core Strategy in 2012. In addition, the Development Plan also comprises of the Site Allocations Plan which was adopted in 2011 and identifies land to meet the requirements set in the adopted Core Strategy.</p> <p>However, it is important to note that the Council is preparing a new Local Plan to meet the requirements of the Framework. As such, it is important that the HNP allows for flexibility and adaptability so it can positively respond to changes in circumstance which may arise over the duration of the plan period. This degree of flexibility is required to ensure that the HNP is capable of being effective over the duration of its plan period and not ultimately superseded by s38(5) of the Planning and Compulsory Purchase Act 2004, which states that:</p> | <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted.</p> |

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|     |      | Policy 1                 | <p><i>'if to any extent, a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approached, or published (as the case may be).'</i></p> <p><b>Holt Neighbourhood Plan</b><br/>These representations are made to the current consultation on the submission version of the HNP, under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012.</p> <p>This section highlights the key issues that Gladman would like to raise with regards to the contents of the HNP as currently proposed and its consistency with the requirements of national policy and guidance. To address these inconsistencies Gladman has sought to recommend a series of alternative options to be considered so that the Plan fully reflects the requirements of national policy and guidance.</p> <p><b>Neighbourhood Plan Policies</b><br/><u>Policy 1: Design and Character</u><br/>Whilst recognising the need for development to provide a mix of housing types, Gladman recommend that the reference to a specific mix of housing types be removed from the policy wording as housing need will inevitably change over</p> | <p>Comment noted.</p> <p>Comment noted.</p> <p>Comments noted.</p> <p>Comment noted. Policy 1 recognises the need for flexibility while still seeking to satisfy local need. Therefore, it references the Central Norfolk Strategic Housing Market</p> |



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|     |      | Policy 2                 | <p>the plan period. Indeed, the policy already refers to the need to have regard to the latest evidence of housing need which will appropriately address the requirements of a specific housing mix.</p> <p><u>Policy 2: Dementia Friendly Communities</u><br/>Whilst recognising the community’s wish to ensure planning applications incorporate the principles of dementia friendly communities, it does not provide any further detail or guidance over what principles should be considered through the design of development. It may be more appropriate if this policy was instead deleted and incorporated within Policy 3 of the HNP.</p> | <p>Assessment (2017) but also identifies that a more up to date information, if available, can be used in determining the housing mix. This will enable Policy 1 to last the plan period and to address possible changes in need and housing mix that the future may demand.</p> <p>Comment noted. The principles and guidance will be added as an appendix that Policy 2 will reference.</p> |
|     |      | Policy 4                 | <p><u>Policy 4: Affordable Housing for the Local Community (Local Lettings)</u><br/>Although Gladman support the ambition of the HNP in seeking to provide affordable housing to local residents, Policy 4 is not a land use policy and does not need to be included in the main HNP document. It is a statement of intent which would be better suited to an appendix to the document which contained other such non-land usepolicies.</p>  | <p>Comment noted. A large number of ‘made’ neighbourhood plans have a policy within that allows for a proportion of Affordable Housing to be made available to residents or those with a local connection first, subject to ‘identified need’.</p>  |
|     |      | Policy 6                 | <p><u>Policy 6: Open Space Protection</u><br/>The above policy states that proposals for development, which would result in the loss of part or all of an important open space as defined by table 1 will not be permitted unless it can be demonstrated that the</p>  | <p>Comment noted.</p>   |

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|     |      |                          | <p>benefit to the local community outweighs the loss.</p> <p>Any policy which seeks to protect land from development should be supported by robust evidence. It would also be useful if the areas identified on table 1 were identified on a policies map to provide clarity to local community members, developers and decision makers the extent of land which is to be protected.</p> <p><b>Site Submission</b><br/> <u>Land south of Lodge Close</u><br/>                     The Town Council are well aware of Gladman's land interests in Holt at land south of Lodge Close. A Framework plan is attached at appendix 1 of this submission.</p>  <p>Whilst it is acknowledged that the HNP does not seek to allocate land for development and instead seeks to shape future development through a series of design</p> | <p>Comment noted. Policy 6 seeks to recognise the importance of these areas to the town and as areas of recreational and visual value. The policy is not seeking 'Local Green Space' designation. (Local Green Space' as per NPPF, defined in paragraphs 76, 77 and 78.)</p> <p>Comment noted.</p> <p>Comment noted. The HNP has chosen not to allocation sites for development as NNDC is</p> |

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|     |      |                          | <p>measures, Gladman consider that it would be prudent of the HNP to allocate land for housing development to assist the local planning authority in identifying sites to help meet the district’s full objectively assessed housing need, Gladman’s primary position is that land south of Lodge Close should be included within the HNP as a potential allocation, with a secondary position for the site to be considered as a reserve allocation.</p> <p>Gladman consider that the above site represents a logical and sustainable extension of Holt to meet both market and affordable housing needs. The delivery of this scheme will provide key benefits for both the local and wider area. The proposal will also deliver significant benefits to the local economy associated with the development of the proposal during the construction phase and lead to an increase in public spending as a result of new residents, ensuring the longevity of essential key services and facilities.</p> <p>The site has been subject to two refused planning applications (Planning ref: PO/14/0846 and PO/14/1603) and one dismissed appeal for development of 170 dwellings (PINS ref: APP/Y2620/W/14/3000517). It is the belief of Gladman that the issues considered in this appeal can be overcome through further work.</p> | <p>currently undertaking this process through the development of the emerging Local Plan.</p> <p>There are merits to your scheme to the existing community - as the proposals would provide the much needed pedestrian access to the Holt Country Park – but this needs to be considered against the harm such a development would do.</p> <p>Comments noted. Please make these representations directly to NNDC for their consideration and later consultation on the emerging Local Plan.</p> <p>Comments noted. If Gladman feel the issues with the proposals can be overcome it is suggested that Gladman engage with NNDC to demonstrate the work that is to be undertaken.</p> |

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|              |              | Overall, do you agree with the HNP ? | <p>Gladman would welcome the opportunity to discuss the sustainability credentials of the site and invite the Town Council to contact us in this regard.</p> <p><b>Conclusions</b><br/>Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. Whilst we support many of the policies aims and objectives in principle, we feel that the Plan would benefit from additional modifications to the Plan to ensure that it allows for flexibility going forward and ensures the Plan is capable of reacting positively to changes that may occur over the plan period.</p> <p>Gladman hopes you have found these representations helpful and constructive. Should you wish to discuss the possible inclusion of land south of Lodge Close as a potential housing allocation then please do not hesitate to contact me.</p> | <p>Comment Noted. Your invite has been passed on to the Town Council for consideration.</p> <p>Comments and general support for the HNP are noted.</p> <p>Comment noted.</p> <p><b>Proposed action:- Comments noted and the following changes to the HNP will be made:-</b></p> <p><b>Policy 2: Add 'At a Glance: a Checklist for Developing Dementia Friendly Communities' as an appendix.</b></p> |
| <b>PS/48</b> | Holt Society |                                      | <p>Agree with Policies 1 and 7.</p> <p>Disagree with no Policies.</p>  | Thank you for your response. Your comments are noted.   |





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|     |      |                                      | affordable housing requirements as agreed as part of planning approval is provided. No excuses.                        | connection and this Policy will enable those in need the opportunity first to access these homes.  |
|     |      | Policy 5                             | Yes<br>Policy fine. The question to be asked is: "how will this policy be enforced?"                                   | Comment noted. The enforcement of this Policy will be by NNDC, as the Local Planning Authority, when determining future planning applications.   |
|     |      | Policy 6                             | But who decides?   | Comment noted. NNDC, as the Local Planning Authority, when determining future planning applications. It will be important for residents to express their opinions on any such proposals both to the developer and NNDC to ensure the local community's view is know. |
|     |      | Policy 8                             | Yes<br>Market conditions will prevail.   | Comments noted.  |
|     |      | Policy 11                            | Yes<br>Care needed in appointing management company. Prefer local Authority ownership                                  | Comments noted although the developer makes the choice.  |
|     |      | Policy 12                            | Yes.<br>100% agree. This needs real encouragement.   | Comment noted.   |
|     |      | Overall, do you agree with the HNP ? | Yes<br>The plan overall is very good. The need is to ensure that the principles are carried out and supported by NNDC. | Support and comments noted. See earlier comments that cover NNDC implementation of the HNP.  |
|     |      |                                      | The plan needs to be simplified in overall content. People do not read these days!                                     | Comment noted.   |

| No.   | Name   | Policy / Theme / Section   | Response Received   | Neighbourhood Plan Comment and Action   |
|-------|--|----------------------------|---|---|
|       |  | Do you agree with the SA ? | Yes   | <p>Support noted.</p> <p><b>Proposed action:- Comments noted and the following changes to the HNP will be made:-</b></p> <p><b>Policy 8: Inset the word "Hotel" into the policy text.</b></p> <p><b>Policy 9: Inset the word "Hotel" into the policy text.</b></p>  |
| PS/50 | Resident<br>Beresford Road<br>Holt<br>NR25 6EW | Policy 13                  | <p>Agree with all Policies.</p> <p>Holt Neighbourhood Plan comments and concern</p> <p>Planners should ensure access roads to new housing and industry should be wide enough to accommodate construction vehicles and emergency vehicles passing parked cars and service vehicles. We don't want any more narrow residential streets like Neil Avenue designed to squeeze as many houses as possible in the site available.</p> <p>The spaces across the streets between the building lines and between the houses should match or improve on those of the immediate environment. New developments would be unsustainable if they impair the quality of life of the existing residents in terms of noise and vibration.</p> | <p>Thank you for your response and support. Your comments are noted.</p> <p>Comments noted. In Policy 1, criteria eleven it is a requirement to designing and building of new roads to Norfolk County Council Highways Authority adoptable standard. It is the Highways Authority that apply the standards to ensure this does not happen.</p> <p>Comments noted. Policy 1 has a number of criteria that should improve the design proposals and the way future residents will live in the new homes. All new development must pass the 'sustainability' test, this includes issues relating to noise and other impact such as vibration.</p> |



| No. | Name | Policy / Theme / Section | Response Received  | Neighbourhood Plan Comment and Action   |
|-----|------|--------------------------|--|---|
|     |      |                          | <p>Holt does not exist to keep developers and construction companies in business. Schemes for residential and commercial development will only be sustainable and should only be approved if they are related to the residential and commercial needs of the parish and to the shopping, employment, schooling, NHS and otherservices in the area.</p> <p>The Neighbourhood Plan supports the scheme for the Norfolk Orbital Railway in principle. Extension of the railway from High Kelling to Holt will bring visitors to the town without cars and if the franchised train operator on the Norwich – Sheringham line is allowed access over the North Norfolk Railway, at least to Holt, as part of the orbital plan then residents without cars would be able to complete their journeys on the national railway system. The site of Holt station by the corner of Station Road andthe bypass is very central for the town centre and the developing residential area.</p> <p>The growing volume of motor traffic in Holt</p> | <p>Comments noted. NNDC has allocated sites in Holt for development as part of the existing Core Strategy and Site Allocations to help meet the needs both for the parish and the wider district.</p> <p>It is likely that further sites will be allocation as part of the emerging Local Plan – as the plan period of the emerging Local Plan runs beyond the current plans to 2036 - Holt is seen as a sustainable location.</p> <p>The emerging Local Plan not only considers the housing needs but, also, the employment requirements. The other agencies, such NCC for schools and NHS, will be engaged in the process and give their input to their requirements.</p> <p>Comments noted. The railway is seen as a sustainable transport option and wouldenable both residents and tourist to access Holt and the surrounding area without using their cars.</p> <p>Comments noted. Traffic and increasing</p> |

| No. | Name | Policy / Theme / Section | Response Received  | Neighbourhood Plan Comment and Action  |
|-----|------|--------------------------|--|--|
|     |      |                          | <p>and the new car park in Church Street highlight a serious congestion and danger spot at the junction of White Lion Street, Church Street and the Market Place because traffic turning right into Church Street conflicts with traffic from White Lion Street on a blind corner. Also traffic rounding the blind corner from White Lion Street conflicts with traffic forking right from Market Place into Station Road. Some vehicles, including buses on special duties, are using the War Memorial island as a roundabout. It might regulate traffic better if the cross were set on a roundabout but traffic managers still need to look the conflict at junction with Church Street.</p> <p>I think the authority for the A148 should be pressed to complete the Holt bypass from Norwich Road, Holt, to the Sharrington straight, bypassing Letheringsett, as originally planned. The almost continuous passage of A148 traffic through Obelisk Plain, Holt, causes long tailbacks and delays in High Street. Completion of the western half of the bypass would not only relieve that point of congestion but also relieve the chronic traffic nuisance to the cottagers in Letheringsett, the hazards of the blind S- bends between the maltings and the rectory and the risk to drivers and cyclists making the two right hand fork turns west of Letheringsett towards Blakeney and Langham.</p> | <p>levels of congestion are a concern for us all. White Lion Street and Market Place are two of a number of areas with issues. This will be added to the project list.</p> <p>Comments noted. Sadly the original proposals for this road were compromised due to funding issues, which are still the issue.</p> <p>Please note some of the locations described are outside the Holt Neighbourhood Area and, therefore, beyond the scope of the HNP.</p> <p><b>Proposed action:- Comments noted and the following changes to the HNP will be made:-</b></p> |

| No.          | Name                             | Policy / Theme / Section  | Response Received  | Neighbourhood Plan Comment and Action   |
|--------------|----------------------------------|---|--|---|
|              |                                  |   |  | <b>Project List: Add to list "Review traffic flows and conflicts around White Lion Street, Church Street and the Market Place to seek improvements."</b>  |
| <b>PS/51</b> | Resident<br>Kelling Road<br>Holt | <p>Policy 1</p> <p>Policy 3</p> <p>Policy 4</p> <p>Policy 5</p> <p>Policy 7</p> | <p>Agree with all Policies 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13 and 14.</p> <p>Unsure about Policy 3.</p> <p>Overall agree with the Neighbourhood Plan and the Sustainability Appraisal Report.</p> <p>Yes<br/>Ensure mix of properties include sufficient affordable housing for younger people.</p> <p>Perceived lack of provision for older / aging population Residential care, respite for carers.</p> <p>25% or <u>more</u> would be better ratio for affordable housing</p> <p>Increase pedestrian and cycleways – encourage public transport use to avoid congestion and improve safety in town centre.</p> <p>Out of town parking areas to increase</p> | <p>Thank you for your response and support.</p> <p>Support noted.</p> <p>Comment noted. Affordable housing will be made available to residents of Holt or those with a connection to Holt through Policy 4.</p> <p>Comment noted.</p> <p>Comment noted. There has to be a balance between the local need and the wider district need. The percentage, at 25%, in Policy 4 provides a balance and should deliver the identified local need.</p> <p>Comment noted.</p> <p>Comment noted, A site was allocated under</p> |

| No. | Name | Policy / Theme / Section             | Response Received   | Neighbourhood Plan Comment and Action   |
|-----|------|--------------------------------------|---|---|
|     |      |                                      | pedestrianisation and reduce traffic.   | Policy CP10: Car Park: Land at Thornage Road of the Site Allocations although this has not come forward and been delivered by the landowner.  |
|     |      | Policy 8                             | Ensure adequate parking available to reduce on-street parking.  | Comment noted.  |
|     |      | Policy 9                             | Really no more tourist / second home accommodation is needed in Holt. Ensure current ones are well used instead.  | Comments noted.   |
|     |      | Policy 12                            | Very important to <u>all</u>  | Comment noted.  |
|     |      | Policy 13                            | New developments should include sufficient car parking and avoid increasing traffic flow through the town centre  | Comments noted.   |
|     |      | Policy 14                            | Develop facilities at Kelling Hospital and around Holt Medical Practice to include residential and convalescent / respite care for aging population   | Comment noted and is likely to receive support from Holt residents.<br><br>Please note that Kelling Hospital and around Holt Medical Practice is outside the Holt Neighbourhood Area and, therefore, beyond the scope of the HNP. |
|     |      | Overall, do you agree with the HNP ? | <p>Yes.</p> <ul style="list-style-type: none"> <li>No major omissions <u>but</u> place more emphasis on care and support for aging population and encouragement of affordable housing development.</li> <li>Tackle parking issues by development of out of town parking and more pedestrianisation of town centre.</li> </ul> | <p>Support noted.</p> <p>Comment noted. Policy 2, 3 and 4 seek to improve future development proposals in this way.</p> <p>Comment noted.</p>   |

| No.   | Name                       | Policy / Theme / Section                        | Response Received  | Neighbourhood Plan Comment and Action  |
|-------|----------------------------|---|--|--|
|       |                            | Do you agree with the SA ?                      | <ul style="list-style-type: none"> <li>• Include residential care on community project list.</li> <li>• Do not allow <u>more</u> second homes!</li> </ul> <p>Yes</p>   | <p>Comment noted and will be added to the project list.</p> <p>Comment noted.</p> <p>Support noted.</p> <p><b>Proposed action:- Comments noted and the following changes to the HNP will be made:-</b></p> <p><b>Project List: Add "Seek additional residential care facilities."</b></p>                                |
| PS/52 | Resident Barrett Road Holt | <p>Policy 1</p> <p>Policy 3</p> <p>Policy 4</p> | <p>Agree with all Policies 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12 and 14.</p> <p>Unsure about Policy 13.</p> <p>Overall agree with the Neighbourhood Plan.</p> <p>Greater efforts must be made to ensure new developments are in character with the town ie. Red brink / flint.</p> <p>More care accommodation is needed as it will free up more of the existing housing stock.</p> <p>First we have to ensure that the number of affordable houses on a development must be increased and enforced rather than giving in to builders all the time.</p> | <p>Thank you for your response and support. Your comments are noted.</p> <p>Support noted.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted. The number of affordable homes is set in the NNDC Core Strategy Policy. Within the National Planning policy Framework (NPPF) there is the ability for a</p> |

| No. | Name | Policy / Theme / Section | Response Received  | Neighbourhood Plan Comment and Action   |
|-----|------|--------------------------|--|---|
|     |      | Policy 5                 | Provision needs to be made to maintain green spaces on new developments to ensure they are not abandoned.  | developer to ask to reduce the number of affordable homes based on viability.<br>Comment noted.   |
|     |      | Policy 7                 | Strongly agree.  | Comment noted.  |
|     |      | Policy 8                 | Development should be restricted to existing employment / industrial sites where there is still capacity available.  | Comment noted.  |
|     |      | Policy 10                | Support should be given to ensure additional facilities are available and affordable to all the community.   | Comment noted.  |
|     |      | Policy 11                | They should remain within control of a) or b) to ensure adequate control is maintained. c) should not be considered.   | Comment noted. Although the choice is made by the developer.  |
|     |      | Policy 13                | Looks good in theory !! However, any reports and assessments will not show a real life situation. Developers will produce reports showing minimal impact on all aspects by making unrealistic assumptions. | Comment noted. Assumptions, if unrealistic, should be challenged. NCC Highways Authority evaluates the data and assessments provided and, as experts, will ensure the reports are done correctly.   |
|     |      | Policy 14                | When considering planning applications, it should be taken into account that additional medical facilities will be required.   | Comment noted and it is considered, there are certain trigger points for individual proposals – although this will not guarantee additional facilities will come.<br><br>The emerging Local Plan also will be considering other requirements - such as NCC for schools and NHS – as part of the process |

| No.                 | Name  | Policy / Theme / Section  | Response Received   | Neighbourhood Plan Comment and Action  |
|---------------------|---|---|---|--|
|                     |   | <p>Overall, do you agree with the HNP ?</p> <p>Do you agree with the SA ?</p>   | <p>Yes.<br/>Will the public be consulted at the five year reviews ?</p> <p>Holt will not be able to sustain the development in progress. Further developments will change the character of the town still further. The change will accelerate as the town gets bigger.</p>  | <p>NNDC will consult and engage with other agencies to ascertain their input to their requirements.</p> <p>Support noted.<br/>Comment noted. It is expected that local residents and stakeholders will be involved in the review. If there are any changes proposed then these will have to be formally consulted on and tested.</p> <p>Comments noted – this is why the HNP is so important to us all to preserve what is special about Holt for us all.</p> <p><b>Proposed action:- Comments noted and no changes are proposed to the HNP.</b></p> |
| <p><b>PS/53</b></p> | <p>Resident<br/>Neil Avenue<br/>Holt<br/>NR25 6TK</p> | <p>Policy 3</p> <p>Policy 5, 6 and 7</p> <p>Policy 8 and 9</p> <p>Policy 10</p> | <p>Agree with all Policies.</p> <p>Overall agree with both the Neighbourhood Plan and the Sustainability Appraisal Report.</p> <p>Care homes / facilities need to be built within walking distance of town centre shops, etc..</p> <p>The provision of a playing field for use of Holt youths is a priority.</p> <p>Any growth in tourism requires additional parking facilities, particularly for coaches.</p> <p>Particularly a sports ground</p> | <p>Thank you for your response and support. Your comments are noted.<br/>Support noted.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted.</p>  |

| No.                 | Name  | Policy / Theme / Section  | Response Received   | Neighbourhood Plan Comment and Action  |
|---------------------|---|---|---|--|
|                     |   | <p>Policy 12, 13 and 14</p> <p>Overall, do you agree with the HNP ?</p> <p>Do you agree with the SA ?</p> | <p>A bus to link the new developments currently building with the town centre is a priority.</p> <p>Yes</p> <p>Yes</p>  | <p>Comment noted.</p> <p>Support noted.</p> <p>Support noted.</p> <p><b>Proposed action:- Comments noted and no changes are proposed to the HNP.</b></p>   |
| <p><b>PS/54</b></p> | <p>Resident<br/>Cley Road<br/>Holt<br/>NR25 6JG</p> | <p>Policy 1</p> <p>Policy 2</p> <p>Policy 3</p>   | <p>Agree with all Policies 1, 3, 4, 5, 6, 7 and 10.</p> <p>Unsure about Policies 12 and 14.</p> <p>Overall agree with the Neighbourhood Plan and the Sustainability Appraisal Report.</p> <p>But habitats for wildlife and their corridors don't seem to have been considered in development so far, many green spaces are being used for building.</p> <p>Building should be for families, local people - <u>not</u> sold off for 2<sup>nd</sup> / holiday homes.</p> <p>Planning must provide for adequate parking - new homes way from the centre will mean <u>car</u> travel to shop, etc..</p> | <p>Thank you for your response. Your comments are noted.</p> <p>Support noted.</p> <p>Comment noted and Policy 5 seeks to makes sure previous mistakes are not made again. While Policy 6 will provide additional protection for open spaces.</p> <p>Comment noted.</p> <p>Comments noted.</p> |



| No. | Name | Policy / Theme / Section | Response Received   | Neighbourhood Plan Comment and Action   |
|-----|------|--------------------------|---|---|
|     |      | Policy 4                 | Holt is a delightful town, character must be kept and given high priority to attached families, with work to employ !   | Comment noted. It is so important that local people are given the ability to access affordable homes.   |
|     |      | Policy 5                 | Spout Hill, Country Park and various walkways etc need protection – used by the community for leisure, sport etc.. Super !  | Comment noted.  |
|     |      | Policy 6                 | Agree with policy in theory – hope practice carries out the policy.   | Comment noted.  |
|     |      | Policy 7                 | Floral attempts in Holt have been fairly low key so far – not exactly award winning I feel.   | Comment noted.  |
|     |      | Policy 8                 | Car parking is expensive and can prevent some attending concerts, church etc.. etc..<br>– Car parking on roads is expensive due to lack of parking spaces and high cost. Makes for 'lethal' conditions for driving and walking. | Comments noted.   |
|     |      | Policy 10                | Agree new extra allotments is a good idea. Strongly agree open green spaces and wildlife should be protected.   | Comments noted.   |
|     |      | Policy 12                | 2 divided halves to the town ?  | Comment noted. It is important that we are seen as one community and seek the improvements needed.  |
|     |      | Policy 13                | Industry or tourism main aim ? Which ?  | Comment noted. For Holt to be a thriving community it requires both – it's a balance. Tourism brings a lot of income to the local economy but on its own will not satisfy all the local employment needs. |

| No.                 | Name  | Policy / Theme / Section  | Response Received   | Neighbourhood Plan Comment and Action   |
|---------------------|---|---|---|---|
|                     |   | <p>Overall, do you agree with the HNP ?</p> <p>Do you agree with the SA ?</p> | <p>In theory yes. Practical application does not always equal the written proposed high standards. Financial restraints ??<br/>Maintenance of roads, pavements trees, verges leaves a lot to be desired at present.</p> <p>Noticed some developments eg. Withers Close was not on the map on Church Hall wall ? How many other developments were not shown ?</p> <p>Yes<br/>We all want the 'perfect' town. Can it be achieved ??!</p> <p>A divided town seems likely – the Georgian tourist area and the industrial and housing development ? The bypass dividing the two. Will Holt still be attractive to tourists ?</p> | <p>Support noted.<br/>Comment noted.</p> <p>Comment noted. The Ordinance Survey maps take time to be updated to show all new developments.</p> <p>Support noted.<br/>We all have a slightly different view on what 'perfect' looks like, so, sadly the answer is no. The HNP will go along way to makethings better for the town and we will certainly be better off with a neighbourhood plan than without one.</p> <p>Comments noted. We all need to make sure this does not happen – Holt is one community – and if we continue to preserve what is important then it will continue to be attractive to tourists.</p> <p><b>Proposed action:- Comments noted and no changes are proposed to the HNP.</b></p> |
| <p><b>PS/55</b></p> | <p>Resident<br/>Neil Avenue<br/>Holt<br/>NR25 6TG</p> |   | <p>Agree with all Policies 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13 and 14.</p> <p>Neither agree or disagree with Policy 12.</p> <p>Overall agree with both the Neighbourhood</p>  | <p>Thank you for your response and support. Your comments are noted.</p> <p>Support is noted.</p>   |

| No. | Name | Policy / Theme / Section       | Response Received  | Neighbourhood Plan Comment and Action   |
|-----|------|--------------------------------|--|---|
|     |      |                                | Plan and the Sustainability Appraisal Report.  |   |
|     |      | Policy 1                       | Good to include drainage. Does this include sewage as well ? If not - it ought to i.e. increase in sewage capacity !   | Comment noted. Yes, criteria 4 of this policy does include sewerage as that is classed as one, of a number, that come under water drainage solutions.   |
|     |      | Policy 4                       | Can we define "affordable" ?<br>Maybe 10% less than market value ?   | Comment noted. There are a number of different tenures that are classed as affordable. One of those is 'discount market value' – this is when the cost of a home is reduced by at least 20% below the market value. |
|     |      | Policy 5                       | Don't want more cycleways  | Comment noted.  |
|     |      | Policy 6                       | Glad to see item 5 play area on Table 1 protected behind our house. What about the football field adjoining it – is that protected too ? It should be.         | Comment noted. This is the school playing field.  |
|     |      | Policy 7                       | Any new listed buildings should be added to "Holt owl trail"!  | Comment noted.  |
|     |      | Policy 9                       | Tasteful hotel / B&B accommodation would be welcome on a small scale.  | Comment noted.  |
|     |      | Policy 12                      | Developer should contribute (via section 106) to better electricity provision in Holt. We are always having power cuts. In the last year we had 8 power cuts ! | Comments noted.   |
|     |      | Overall, do you agree with the | Yes  | Support noted.  |

| No.          | Name                       | Policy / Theme / Section                                  | Response Received  | Neighbourhood Plan Comment and Action   |
|--------------|----------------------------|---|--|---|
|              |                            | HNP ?<br><br>Do you agree with the SA ?                   | Yes  | Support noted.<br><br><b>Proposed action:- Comments noted and no changes are proposed to the HNP.</b>   |
| <b>PS/56</b> | Resident Kenwyn Close Holt | Policy 5<br><br>Policy 6<br><br>Policy 9<br><br>Policy 10 | Agree with all Policies 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12 and 13.<br><br>Disagree with all Policy 6.<br><br>Neither agree or disagree with Policy 14.<br><br>Overall agree with the Neighbourhood Plan or the Sustainability Appraisal Report.<br><br>New development on A148 does not appear to have foot paths or cycle tracks into Holt. Therefore, more traffic to cause more parking problems.<br><br>Partial loss maybe unavoidable but total loss could never be outweighed by any type of development.<br><br>Physical structure must be in keeping with town. No Premier inn 'style' building.<br><br>Lack of car parking is killing Holt. Cars are parking on more and more small residential streets causing anxiety to residents. | Thank you for your response and support. Your comments are noted.<br><br>Support noted.<br><br>Comment noted. We must ensure new developments have linkages and stop the same mistakes being made again.<br><br>Comment noted. It should be noted that should a proposal come forward which not only replaced the existing but made it better then the local community may feel that it is the right thing.<br><br>Comment noted.<br><br>Comment noted. |

| No.                 | Name  | Policy / Theme / Section  | Response Received   | Neighbourhood Plan Comment and Action  |
|---------------------|---|---|---|--|
|                     |   | <p>Overall, do you agree with the HNP ?</p> <p>Do you agree with the SA ?</p> | <p>Yes</p> <p>Yes</p>   | <p>Support noted.</p> <p>Support noted.</p> <p><b>Proposed action:- Comments noted and no changes are proposed to the HNP.</b></p> |
| <p><b>PS/57</b></p> | <p>Resident<br/>Burrell Close<br/>Holt<br/>NR25 6DT</p> | <p>Overall, do you agree with the HNP ?</p> <p>Project List</p>               | <p>Neither agree or disagree with any Policies or the with the Neighbourhood Plan or the Sustainability Appraisal Report.</p> <p><u>Omissions</u><br/>The influence and effect of the location of Gresham School on <u>all</u> aspects of life in Holt.</p> <ul style="list-style-type: none"> <li>• During term time and holidays car and personnel traffic !</li> <li>• The Auden Theatre during holiday periods.</li> <li>• School Swimming Pool.</li> <li>• This music facility (for tourists, Holt residents and visitors).</li> <li>• Seasonal homes in Holt (how many?)</li> </ul> <p><u>Add to Project List :</u></p> <ul style="list-style-type: none"> <li>• Entry and exit signs for cars using Fish Hill and the 'alleyway' joining the High Street and Bull Street. (Suggested many years ago !) ... Top priority to pedestrians.</li> </ul> | <p>Thank you for your response. Your comments are noted.</p> <p>Comments noted.</p> <p>Comments noted.</p>                         |

| No.                 | Name                           | Policy / Theme / Section   | Response Received   | Neighbourhood Plan Comment and Action   |
|---------------------|--------------------------------|--|---|---|
|                     |                                |  | <ul style="list-style-type: none"> <li>Coach facilities to take residents to London and bring visitors (as in the past !)</li> </ul>  | <p>Comment noted.<br/> <b>Proposed action:- Comments noted and no changes are proposed to the HNP.</b></p>  |
| <p><b>PS/58</b></p> | <p>Resident<br/>No address</p> | <p>Policy 4</p> <p>Policy 14</p> <p>Overall, do you agree with the HNP ?</p> | <p>Agree with all Policies, the Neighbourhood Plan and the Sustainability Appraisal Report.</p> <p>Don't like the term "up to 25%" – needs a minimum percentage as well as maximum.</p> <p>Not sure that this can be realistically achieved !</p> <p>Yes<br/> <u>Omissions:</u><br/>                     Whilst housing is increasing significantly there are insufficient affordable homes.</p> <p>Too few job opportunities for new arrivals.</p> <p>Land designated for commercial development is not being utilised due to unrealistic rentals: Thus no new businesses and existing businesses having to move.</p> <p>Holt is in danger of becoming a vast retirement home.</p> | <p>Thank you for your response and support. Your comments are noted.</p> <p>Comments noted. If there is no local need identified then the minimum is zero. The percentage will be driven by local people on the housing list.</p> <p>Comment noted.</p> <p>Support noted.</p> <p>Comment noted. Affordability of homes in Holt is a real issue, hence Policy 4 seeking to make some available to residents or people with local connection to Holt.</p> <p>Comment noted.</p> <p>Comment noted. Market forces will determine what is or is not possible. Development will only come forward if a developer sees it as being profitable to them and the landowner.</p> <p>Comment noted.</p> |

| No.          | Name  | Policy / Theme / Section   | Response Received  | Neighbourhood Plan Comment and Action   |
|--------------|---|----------------------------|--|---|
|              |   | Do you agree with the SA ? | <p>Until the parking problem is resolved businesses and tourism will continue to decline.</p> <p>Yes.<br/>The Sustainability Appraisal is ridiculously lengthy at 146 pages and largely unintelligible to the man in the street. When will consultants accept that 'less' is 'more'.</p>   | <p>Comment noted.</p> <p>Support noted.<br/>Comment noted. The Sustainability Appraisal is a big document and has to robustly test – using the framework agreed with the statutory bodies – each of the 14 policies in the HNP.</p> <p>The main body of the Sustainability Appraisal is only 22 pages with the remaining bulk in the appendices being the Strategic Environmental Assessment (SEA) and detailed testing of each policy.</p> <p><b>Proposed action:- Comments noted and no changes are to the HNP.</b></p> |
| <b>PS/59</b> | Resident<br>Valley Lane<br>Holt<br>NR25 6SF |                            | <p>Neither agree or disagree with any Policy, the overall Neighbourhood Plan or the Sustainability Appraisal Report.</p> <p>Holt needs if we are to have <u>more</u> houses a larger school, Fire Station, Police Station, and cheaper shops, also more employment for locals. Car parks. New Sewage Plant.</p> <p>But where is the money coming from?</p> | <p>Thank you for your response and your comments are noted.</p> <p>Comments noted and many of these points are specifically covered in the HNP.</p> <p>Comment noted. Should new development come to Holt from the emerging Local Plan, that development would also bring funding to make necessary improvements to facilitate the development proposals.</p>   |

| <b>No.</b> | <b>Name</b> | <b>Policy /<br/>Theme /<br/>Section</b> | <b>Response Received</b> | <b>Neighbourhood Plan<br/>Comment and Action</b>                                |
|------------|-------------|---|--------------------------|---|
|            |             |   |                          | <b>Proposed action:- Comments noted and no changes are proposed to the HNP.</b> |







# Appendix B

## **FACILITATION REPORT TO HOLT TOWN COUNCIL IN RESPECT OF THE HOLT NEIGHBOURHOOD PLAN 2018-2036**

**Report by Intelligent Plans and Examinations (IPE) Ltd**

**Author: Andrew Seaman BA (Hons) MA MRTPI**

**Draft Report (Ver. 1.5): 10.6.2021**

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| Document update |                              |
|-----------------|------------------------------|
| 29.4.21 (AS)    | Original Facilitation Report |
| 20.5.21 (AS)    | Inclusion of draft MoU       |
| 23.5.21 (AS)    | Inclusion of Project Plan    |
| 10.6.21 (AS)    | Final summary and MoU        |

## Abbreviations commonly used in this report

|                    |                                    |
|--------------------|------------------------------------|
| HNP / the draft NP | Holt Neighbourhood Plan            |
| HRA                | Habitat Regulations Assessment     |
| LGS                | Local Green Space                  |
| MOU                | Memorandum of Understanding        |
| NPPF               | National Planning Policy Framework |
| NNDC               | North Norfolk District Council     |
| PPG                | Planning Practice Guidance         |
| SEA                | Strategic Environmental Assessment |
| TC                 | Holt Town Council                  |
| QB                 | Qualifying Body                    |

Useful sources of information on Neighbourhood Planning include the following:

[National Planning Policy Framework](#)

[Planning Practice Guidance](#)

[Locality](#) including:

- [Step by Step Roadmap Guide](#)
- [Making Local Green Space Designations](#)
- [How to assess and allocate sites for development](#)
- [Achieving well designed places through neighbourhood planning](#)
- [How to write planning policies](#)

## Facilitation Summary

Intelligent Plans & Examinations (IPe) has worked with Holt Town Council, and in particular its Finishing Group and Town Clerk, to progress the Neighbourhood Plan towards submission to North Norfolk District Council.

A Facilitation Report and Health Check was undertaken on the neighbourhood plan to enable HTC to identify areas of its original submission, including the Basic Conditions Statement and Consultation Statement, that require updating and revision. HTC are committed to updating its plan and resubmitting as soon as practical and ideally before the end of 2021.

Key progress points include:

- The formulation by the TC of a Finishing Group consisting of three key Councillors and the Town Clerk with terms of reference;
- An independent Facilitation Report with Health Check (see below and Appendix 2);
- Obtaining an editable version of previous documentation;
- A series of Zoom meetings to discuss matters arising including the scoping of new plan content, liaison with North Norfolk District Council, resources and project planning;
- Liaison and agreement with NNDC who will undertake HRA and SEA Screening with consultation;
- A verbally agreed Memorandum of Understanding between HTC and NNDC following the Locality template (see Appendix 4) (to be signed within two weeks);
- A draft project plan with key tasks and milestones indicative of a November 2021 submission (See Appendix 3).

The Finishing Group are scheduling appropriate meetings to agree a short term project plan with key tasks. The aspiration is to follow a targeted approach to updating the neighbourhood plan where necessary with new content as applicable.

The District Council acknowledge its role in supporting the neighbourhood plan making process and offers it support to the TC as reflected in the MoU.

# 1. Overview

## Facilitation Brief

1.1 Intelligent Plans & Examinations (IPE) was commissioned by Locality on the request of Holt Town Council to undertake an independent review of the Holt Neighbourhood Plan, to assist in moving the plan towards successful submission and to assist in addressing the perceived impasse between the Town Council and North Norfolk District Council.

1.2 Practically the Facilitation support requires the following:

- A review of the draft NP to determine what work is required (if any) to ensure that it meets the Basic Conditions and flag any areas where the group may need to consider updating the evidence (if issues identified); (see Appendix 2)
- A determination of the position of NNDC with regard to the draft NP and agreement in writing from the QB and NNDC as to the way forward for the NP and the work remaining to be completed so that NNDC can validate the draft NP and move to Reg 16 Consultation; (see Appendix 1 and to include a Memorandum of Understanding)
- A short summary report setting out the advice and support provided to the group, along with outcomes and options. This report should set out clearly the work required on the draft NP so that it can be submitted to NNDC.

1.3 This report is iterative. It will be updated to align with progress being made on the HNP and it will form the basis for discharging the terms of the Brief.

## Neighbourhood Plans - background and procedural context

1.4 Neighbourhood Planning is designed to give communities, such as at Holt, the direct power to develop a shared vision for their area and to shape its development and growth. As the government's Planning Practice Guidance (PPG) notes: "*Neighbourhood planning provides a powerful set of tools for local people to plan for the types of development to meet their community's needs and where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area*<sup>1</sup>."

1.5 The PPG is clear that a neighbourhood plan should complement any existing local plan such as the North Norfolk Local Plan/Core Strategy: "*A neighbourhood plan should support the delivery of strategic policies set out in the local plan or spatial development strategy and should shape and direct development that is outside of those strategic policies (as outlined in [paragraph 13](#) of the revised National Planning Policy Framework).*<sup>2</sup>" It is therefore necessary for plan making bodies such as Holt Town Council to seek to work constructively with North Norfolk District Council and vice versa.

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<sup>1</sup> [Paragraph: 001 Reference ID: 41-001-20190509](#)

<sup>2</sup> [Paragraph: 004 Reference ID: 41-004-20190509](#)

1.6 The Holt Neighbourhood Plan, if it is to proceed to referendum, must meet the Basic Conditions set out in the Town and Country Planning Act 1990 (as amended).<sup>3</sup> In summary these are:

- having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
- the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development;
- the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
- the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations (under retained EU law); and
- meet prescribed conditions and comply with prescribed matters.

A further prescribed Basic Condition requires that the making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017, which set out the habitat regulation assessment process for land use plans, including consideration of the effect on habitats sites. (See Schedule 2 to the Neighbourhood Planning (General) Regulations 2012 (as amended) in relation to the examination of neighbourhood development plans.)

1.7 It is therefore essential that the Holt Neighbourhood Plan demonstrably meets these basic conditions and this must be supported by adequate evidence.

1.8 In preparation, the PPG<sup>4</sup> advises that a Town Council should work actively with other members of the community who are interested in the neighbourhood plan and its content.

1.9 The PPG makes clear that North Norfolk District Council must

- take decisions at key stages in the neighbourhood planning process within the time limits that apply;
- provide advice or assistance to a parish council, neighbourhood forum or community organisation that is producing a neighbourhood plan or Order as required by paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990 (as amended);
- should
  - be proactive in providing information to communities about neighbourhood planning;
  - fulfil its duties and take decisions as soon as possible, and within statutory time periods where these apply;
  - set out a clear and transparent decision making timetable and share this with those wishing to prepare a neighbourhood plan or an Order; and

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<sup>3</sup> Paragraph 8(2) of Schedule 4B.

<sup>4</sup> PPG Reference ID: 41-015-020160211.

- constructively engage with the community throughout the process including when considering the recommendations of the independent examiner of a neighbourhood development plan or Order proposal.<sup>5</sup>

1.10 The PPG makes clear that the Town Council, as a qualifying body, should be inclusive and open in the preparation of its neighbourhood plan 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; and
- is made aware of how their views have informed the draft neighbourhood plan or Order.

1.11 NNDC must satisfy itself that a draft neighbourhood plan submitted to it for independent examination complies with all the relevant statutory requirements albeit the authority is considering the draft plan against the statutory requirements set out in paragraph 6 of Schedule 4B of the Town and Country Planning Act 1990 (as amended). A local planning authority has to be satisfied that a Basic Conditions Statement has been submitted but it is not required to consider at that stage whether the draft plan or order meets the Basic Conditions.

1.12 Following submission, NNDC must publicise the HNP for at least 6 weeks to invite representations and notify relevant consultation bodies prior to sending the plan for independent examination.

1.13 Thereafter an independent examination tests whether or not a draft neighbourhood plan meets the Basic Conditions, and other matters set out in paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended). If successful, feasibly with recommended modifications, the HNP would be subject to a neighbourhood planning referendum organised by NNDC. If a majority vote in favour of the HNP then the plan is 'made' and becomes part of the formal development plan for the area.

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<sup>5</sup> See PPG Reference ID: 41-021-20140306 and 41-022-20150209.



## 2. The Neighbourhood Plan

### Evolution – a summary

2.1 Work began on the Holt Neighbourhood Plan in 2013. The parish of Holt was designated as a Neighbourhood Area by NNDC on 2 December 2013.

2.2 A Steering Group was established with agreed Terms of Reference<sup>6</sup> (ToR) that were last updated in 2017. (It is assumed that the Steering Group is no longer operational based on the dates in the ToR. It is understood that a reduced steering group, known as the ‘finishing group’ is now in place).

2.3 A community launch event was undertaken in October 2014.

2.4 A hiatus in activity appears to have occurred before a presentation was made to the Town Meeting in March 2017 which sought to ‘relaunch’ the NP and seek feedback on a Mission Statement and Objectives for the plan.

2.5 From June 2017 to December 2017 a consultation event and open Steering Group meetings were held to develop the policies and plan’s content.

2.6 In January 2018 a 6 week consultation was held to comply with the requirements of Regulation 14. This was followed by a presentation to the Town Meeting in March 2018 to share outcomes of the consultation and thereafter a series of open Steering Group meetings were held which reviewed the responses received.

2.7 The HNP was forwarded to NNDC in September 2019 with an intent to be formally submitted. NNDC did not accept the submission as valid for the reasons set out in its correspondence dated 29.1.2020 (Appendix 1).

2.8 Thereafter, the progression of the HNP stalled. 2021 has seen the Town Council initiate a resumption of work on the HNP with a view to submitting the plan to NNDC under Regulation 15, whereupon public consultation and subsequent independent Examination can occur.

### The Current Plan and Evidence

2.9 The Town Council has the following submission documents:

- Holt Neighbourhood Plan 2018-2038 Examination Version;
- Basic Conditions Statement, August 2019; and
- Consultation Statement, August 2019.

2.10 In terms of supporting evidence, the HNP and the Town Council website also provides the following documents:

- Sustainability Appraisal Report, June 2019;

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<sup>6</sup> See Consultation Statement Appendix 3.

- Sustainability Appraisal Scoping Report Final, November 2017; and
- Habitat Regulations Assessment Screening Report, August 2019.

2.11 There are no further evidence documents provided. However, the HNP refers to:

- The National Planning Policy Framework;
- The Holt Vision 2012;
- Building For Life 12;
- Historic England's Streets for All;
- At a Glance: a checklist for Development Dementia Friendly Communities;
- Workshop Feedback Summaries 2016;
- ONS Annual Survey of Hours and Earnings (undated); and
- Better Broadband for Norfolk project.

The Sustainability Appraisal Scoping Report 2017 contains some baseline information relevant to the parish including 2011 Census data and information from government departments/agencies.

Documents produced by/for NNDC referred to include:

- Core Strategy;
- Sites Allocations;
- North Norfolk Design Guide SPD;
- North Norfolk Landscape Character Assessment 2009;
- Holt Conservation Area Character Appraisal and Management Proposals;
- Parts of the NNDC emerging Local Plan Evidence Base including
  - Retails and Town Centres Uses Study 2017;
  - Strategic Housing Market Assessment;
  - Et al.

2.12 All supporting evidence should be collated into a single list and be publicly provided with appropriate hyperlinks.

### 3. The Neighbourhood Plan

#### Summary

3.1 The foundations of the HNP are provided by the existing submission documents. Appendix 2 (below) is an independent Health Check of the current plan following the standard Locality template. This provides observations and recommendations on the existing plan designed to increase the chances of a successful submission to NNDC and subsequent Examination.

3.2 The HNP, the Basic Conditions Statement and the Consultation Statement all require updating to reflect the passage of time. At present, the TC will be significantly hindered without access to editable versions of the previous submission documents which are held by their previous consultant.

3.3 Liaison with NNDC is recommended to address the SEA screening, the HRA screening and to ensure the HNP is in general conformity with the strategic policies of the development plan whilst having due regard to the PPG advice in relation to the emerging Local Plan.<sup>7</sup>

#### Foreword, Executive Summary and Introduction/Background

3.4 The first three sections of the HNP would benefit from increased clarity on the vision for the parish, the relationship to the Vision for Holt and a reduction in length of the narrative around plan production. A focus on sustainable development would helpfully address one of the basic conditions against which the HNP will be assessed at Examination.

#### Mission Statement, Objectives

3.5 The rationale for the Mission Statement and the way in which the objectives have been derived needs to be provided. This should include reference to community engagement (and evidence of the outcomes of early consultation). Without further explanation of why the plan sets out to do what it does, it is at greater risk of being considered unjustified and arbitrary.

3.6 The links between the Mission Statement, the Objectives, the Themes and the Policies should be made clearer in the narrative whilst the inclusion of monitoring indicators would ensure that the HNP is measurably successful over time. The HNP should include the latest update position on the emerging Local Plan. All maps should be checked for accuracy.

#### Sustainable Growth and Development, Wider Spatial Context etc

3.7 These sections should emphasise the way in which the HNP will support sustainable forms of development and complement the existing and emerging development plan.

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<sup>7</sup> PPG Reference ID: 41-009-20190509

3.8 The purpose of the Table in paragraph 6.4 is unclear and should be reviewed/deleted/amended.

3.9 Chapter 7 of the HNP contains the policies. The majority of policies require amendment to better meet government guidance that requires:

*“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. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared”.*<sup>8</sup>

#### Design and Character

3.10 The supporting text to Policies 1-4 should be clarified in support of the policies and their content.

3.11 Policy 1 contains 13 criteria which are not all clear, fully justified and in some instances replicate national policy. Consideration should be given to refining the policy, feasibly into two (or more) where issues of physical design (eg bullets 1, 2, 3, 4, 8, 9, 10) are dealt with separately from housing size and occupation (eg bullets 3, 5) and infrastructure matters (eg bullets 4, 12, 13).

3.12 Policies 3 and 4 require additional evidence as to their content which should take account of the emerging Local Plan.

#### Environment

3.13 Policies 5, 6 and 7 require review to avoid repetition of national policy and the citation of appropriate evidence which justifies their content. Consideration could be given to the designation of Local Green Spaces.

#### Tourism and Employment

3.14 The evidence for this section of the HNP is rather old and could be updated by existing evidence held by NNDC in relation to its emerging Local Plan (eg retail, economic needs etc). The evidence for the approach towards hotel accommodation needs to be clearer.

#### Leisure and Culture

3.15 There is some replication of content in this part of the HNP in relation to demographics and open space. The policies should be reviewed to ensure they are locally distinct and not replicating existing development plan policies.

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<sup>8</sup> PPG Reference ID: 41-041-20140306

## Infrastructure

3.16 Policies 12-14 are broad and rather generic. There is insufficient clarity in the evidence and supporting text as to why they are needed and how they will be effectively implemented. They should be reviewed.

## Monitoring/glossary

3.17 The monitoring of the policies is a helpful opportunity to ensure the HNP is successfully implemented. Some indicators of success should be included.

3.18 The glossary should be shortened.

## 4. Options for HNP Completion.

4.1 For completion of the HNP there are two primary considerations to bear in mind:

- The need to produce a plan accompanied by the appropriate documentation that enables NNDC to accept it as a valid submission under Regulation 15 of the Neighbourhood Planning Regulations and to proceed to Examination. In this respect, NNDC considers this will include the need for further work in relation to SEA and HRA Screening.
- The plan should be submitted on the basis that it has optimised its likelihood of being successfully examined against the Basic Conditions and being able to proceed with the minimum of modification to a referendum.

4.2 There are two main options for the TC to consider if the HNP is to be progressed:

### A) Holistic Review

4.3 Whilst the HNP has been progressed to a relatively advanced stage, there remains an opportunity to ensure that the content of the plan is meeting the land use aspirations of the Town Council and the community.

A holistic review of the HNP would assess its structure and content to ensure that its suite of policies represent the best means of delivering appropriate beneficial change to Holt. Such a review would enable the introduction of new content to the plan as appropriate, for example provision for community facilities (cemetery), economic development and housing.

The review could be informed by a high level analysis of the strengths and weaknesses of the current plan which would inform those areas that require further work and opportunities for new content.

For example

| Strengths  | Weaknesses  |
|--|---|
| Community led by the TC<br>Experience of previous consultations  | Passage of time – out of date<br>Some generic policies<br>Limitations in evidence       |
| Opportunities  | Threats   |
| Scope to strengthen policies and ensure distinctive to Holt<br>Scope to include new policy provision (eg cemetery, LGS, economic land)<br>Include emerging Local Plan provisions | Not legally compliant (SEA/HRA)<br>Insufficient evidence<br>Consultation fatigue<br>etc |

A holistic review will require additional time and effort to complete. A further Regulation 14 consultation will be necessary which would affect the timescales for overall HNP completion. The resulting plan is likely to be more successful in achieving its aims for the parish. This would also ensure there is consultation on the NNDC SEA and HRA screening prior to submission.

#### B) Targeted Update

4.4 The existing plan, Basic Conditions Statement and Consultation Statement would be updated to reflect the passage of time and incorporate identified priority changes to areas of greatest risk to a successful examination. These would be identified by the TC, with regard to Appendix 2, in liaison with NNDC (governed by the MoU).

The cost and delay of reaching submission stage would likely be reduced albeit the resulting plan may not maximise the opportunities for positive change in the parish.

In addition, there is a risk that the Regulation 14 consultation may be considered undermined given that NNDC takes the view that the SEA and HRA information provided is inadequate. This can be resolved when the scale of the HNP updates and the new screenings are undertaken.

## **5. Stages for Completion**

5.1 The timescales leading to submission to NNDC will be dependent upon the selected option and the capacity of the TC/NNDC to undertake the necessary updates.

- a. Option Selection
- b. Project Plan – to determine tasks and timescales
- c. Concurrent liaison with NNDC informed by Memorandum of Understanding
- d. Plan update
- e. Submit to NNDC

## **6. Conclusion**

6.1 The HNP is not currently suitable for submission to NNDC under Regulation 15. The Town Council must determine the most appropriate option for HNP completion as set out above.

6.2 Thereafter a project plan will be devised to support the delivery of the revised HNP which will include the completion of SEA/HRA screening as managed by an agreed Memorandum of Understanding with NNDC.

*Andrew Seaman*

IPE – Advisor and Examiner

April 2021





## Appendix 1

*Validation Correspondence from NNDC (converted from original pdf file)*

North Norfolk District Council  
Holt Road, Cromer NR27 9EN Telephone 01263 513811

NORTH  
NORFOLK  
DISTRICT  
COUNCIL

29.01.20

RE Holt Neighbourhood Plan

Dear Gemma,

Following the submission of the Holt Neighbourhood Plan documents I have now had the opportunity to review the documents and check for compliance and validation requirements.

The neighbourhood planning regulations require that the Council must satisfy itself that the required documents have been provided, are in the correct format and contain the level of detail to enable publication, public participation and examination. In addition, there are separate regulations that the Council must adhere to in regard European legislation, namely in the Environmental Assessment of Plans and Programmes.

Unfortunately, the submission cannot be registered at this time as the required documentation is incomplete and does not comply with the relevant legislation:

1. The regulations require that NNDC as the "competent authority" undertake any HRA screening and issue a subsequent screening determination prior to submission in order to inform the plans production;

Although a shadow HRA screening document accompanies the Draft Plan it is not of sufficient detail, accuracy, nor sufficiently up to date to be relied upon to issue a retrospective screening determination or confirm adherence to the required basic conditions.

2. SEA screening determination issued by a responsible body;

Following our comments at pre-submission consultation no up-to-date SEA screening appears to have been undertaken or determination requested from the Council in order to satisfy and conclude appropriately and accord with the required basic condition requirements. Unfortunately, the information/assessment contained in the accompanying documents is not of sufficient detail, accuracy, nor sufficiently up to date in order to be relied upon for the Council to conclude appropriately and issue the required SEA determination. The appropriate HRA assessment is also required to feed into such an assessment before any conclusions can be drawn on environmental effects.

3. A word version and or editable version of the Draft Plan; .
4. A full list including contact details of local and statutory consultees previously engaged/participated with during the making of the Draft Plan;
5. All background evidence and topic papers that supports and informs the proposed plan and basic conditions statements;

Full guidance on the required documentation at this stage is published on the [Council's web site](#)<sup>1</sup> under submission check sheet NPC2 and was contained in the Council's pre-submission commentary on the then emerging Plan [dated February 2018](#)<sup>2</sup> and published on our web site.

Once the Council has all the required Documents and can successfully validate these the Town Council will be able to resubmit and we will arrange the required consultation and subsequent examination. We will undertake the SEA and HRA screening for you, however it will take some time to schedule in the required work into our busy work programme and I would suggest that you seek an early meeting with myself and the team to explain in more detail the requirements and agree the next stages.

Irrespective of the technical aspects of verification and the legal requirements placed upon the Council I would respectfully suggest that you may wish to take the intervening time to review the documents not only for content, structure, and appropriate evidence but also in the areas of general conformity. The submission would appear to contain many conformity

issues, which we would be duty bound to raise at any examination. The accompanying statements appear to list policies but without supplying analysis or justification from which people will be able review and base any subsequent commentary on. You should be aware that where a neighbourhood plan contravenes significant elements of the Local Plan, then generally it will require an SEA.

There are also considerable inconsistencies throughout the SA Scoping Report November 2017, the consultation statement and basic conditions statement with regard to the assessment, interpretation, who and when the statutory consultees were consulted, how the responses were interpreted and reported and how these have subsequently been taking into account. Consequently, there is significant concern that the approach has led to a potentially inappropriate conclusion. It is due to these that I cannot rely on the work to conclude appropriately at this stage.

The preparation of neighbourhood plans and any SEA have become increasingly professional, part as a response to legal challenges but also due to the greater emphasis now being placed on providing complete (rather than selective) and robust evidence.

As previously advised a conformity check sheet of Local Plan policies is available on our web site and it is recommended that further detailed assessments are undertaken prior to resubmission and the Plan altered accordingly to remove conflict. As it stands the Draft Plan could be seen as misleading to the general public in its ability to provide an effective planning framework. You should equally be aware that it is not the role of the inspector at examination to do this on your behalf, but purely to assess the Plan against the adequacy of the tests. If, however such a review concludes policies are not in general conformity then this casts doubt on quality of the assessments around how the overall plan contributes to sustainable development and could put the entire Plan at significant risk if the accompanying documents are also not updated and refined. I would strongly advise that you reevaluate the work done so far prior to any further submission.

I fully understand that the preparation of Neighbourhood Plans is a sizeable and complex challenge and consequently we routinely advise, including in our published guidance, that Neighbourhood Plan groups should work closely and collaboratively

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<sup>1</sup> <https://www.north-norfolk.gov.uk/neighbourhoodplans>

<sup>2</sup> <https://www.north-norfolk.gov.uk/info/planning-policy/neighbourhood-plans/holt-neighbourhoodplan>

with the professional planning staff at the local planning authority throughout the process in order to avoid potential issues and pitfalls such as these. Unfortunately, the approach taken in the preparation of the HNP by the steering group has been

far more isolated than it should have been, and as a result we now regrettably need to draw your attention to the aforementioned issues.

You may wish to consider obtaining a professional and independent pre-submission review of the Plan. Some practices and organisations that provide the pool of qualified independent inspectors to examine Neighbourhood Plans offer such a service and we would be happy to provide further details upon request.

I would welcome the opportunity to meet with you to discuss how you wish to proceed and your expectations, and look forward to hearing from you in due course. .

ards



Regards

Iain Withington MRTPI Planning Policy Team leader  
01263 516034

## **Appendix 2**

### **Holt Neighbourhood Plan**

**Produced by Holt Town Council**

**Health Check – April 2021<sup>9</sup>: Undertaken by Andrew Seaman BA (Hons) MA MRTPI**

#### **Summary of Recommendations**

##### **1. Process**

- The Holt Neighbourhood Plan (HNP) has been developed by the Town Council. Much work has clearly been undertaken, including a pre submission Regulation 14<sup>10</sup> public consultation in 2018, prior to the submission of the HNP to North Norfolk District Council under Regulation 15 in 2019. At this point NNDC were unable to accept the TC submission for the reasons set out in correspondence dated 29.1.20.
- A Consultation Statement and a Basic Conditions Statement have been undertaken. These are important documents. The Consultation Statement and Basic Conditions Statement require further review in order to be finalised prior to the resubmission of the HNP to NNDC. These should contain the details of procedural compliance and up to date consideration of the applicable Basic Conditions that should be met by any Neighbourhood Plan (NP) intending to be made. (see below).
- Further liaison and correspondence with NNDC will be necessary to ensure, as far as practical, that the District Council is in agreement with the process of the HNP production and its final content. NNDC have offered to undertake a SEA and a further HRA. This should be accepted and undertaken. In the light of the new screenings, consideration should also be given to whether the SEA and HRA information provided at Regulation 14 was sufficient to meet the legal requirements at that stage. Reference within the Basic

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<sup>9</sup> This Report is based on the information made available which primarily constitutes: the draft NP and Appendices A-F; the NP website, the NNDC Local Plan.

<sup>10</sup> Town and Country Planning, England, The Neighbourhood Planning (General) Regulations 2012.

Conditions Statement will be required. Consequently, there is presently insufficient evidence on either issue to suggest that the legal requirements have been met.

## 2. Content

- The HNP is broadly drafted to take into account national planning policy which includes the requirement to plan positively for sustainable forms of development. However, the HNP has limited references to ‘sustainable development’ within its text. The HNP could therefore helpfully be amended to provide more explicit explanation as to how the plan will contribute towards sustainable forms of development. This should be rectified with additional content/commentary within the plan with cross references to the amended Basic Conditions Statement.
- The HNP does not have a stated Vision albeit does have a ‘mission statement’. It would be helpful to set out a brief explanation as to how, in all its parts, this has been derived with reference to the evidence base. The plan contains 14 separate policies grouped within 5 Themes (Design and Character, Environment, Tourism and Employment, Leisure and Culture, Infrastructure). The derivation of the mission statement and the links/origins to the themes should be more clearly explained, feasibly with additional text to the HNP and the Consultation Statement. The policies themselves require refinement. They should be clearer in their purpose, ensure they are supported by specific evidence where necessary and be positively stated land use policies. All should be reviewed to be more effective in implementation.
- Liaison with NNDC should be made to ensure the general conformity of the HNP with the current strategic policies of the relevant development plan and to take account, where appropriate, of the emerging new Local Plan.<sup>11</sup> This issue is addressed to a degree in the Basic Conditions Statement but would benefit from more analytical narrative as to how the condition is met. A ‘Memorandum of Understanding’ leading to a ‘Statement of Common Ground’ with NNDC would be a useful addition to the evidence base prior to formal submission for Examination.
- A more detailed Implementation and monitoring section could be introduced explaining how the policies will be monitored for their effectiveness. A helpful guide is available [here](#).

**Andrew Seaman**

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<sup>11</sup> PPG Reference ID: 41-009-20190509.

**Part 1 – Process**

|     | Criteria   | Source  | Response/Comments  |
|-----|--|---|--|
| 1.1 | Have the necessary statutory requirements been met in terms of the designation of the neighbourhood area?  | <b>Holt NP<br/>Basic Conditions Statement</b> | <p>Yes, this requirement is met to date.</p> <p>Page 29 of the HNP (Basic Conditions Statement) confirms that the Town of Holt was confirmed as the designated area by NNDC on 17 April 2019. A map of the designated area is included on page 6.</p> <p>It would be useful to incorporate in the Basic Conditions Statement a copy of the confirmation from NNDC.</p>   |
| 1.2 | If the area does not have a Town council, have the necessary statutory requirements been met in terms of the designation of the neighbourhood forum? | <b>Holt NP<br/>Basic Conditions Statement</b> | The HNP is being produced by Holt Town Council.  |
| 1.3 | Has the plan been the subject of appropriate pre-submission consultation and publicity, as set out in the legislation, or is this underway?          | <b>Holt NP<br/>Consultation Statement</b>     | <p>The evidence which currently confirms the process of community involvement and engagement requires updating. The Consultation Statement would benefit from additional details of how consultation was undertaken and should ensure it contains adequate documentary evidence to demonstrate that the legislative requirements have been met.</p> <p>At present it cannot be concluded that the HNP has been the subject of appropriate pre-submission consultation.</p>                                   |
| 1.4 | Has there been a programme of community engagement proportionate to the scale and complexity of the plan?  | <b>Holt NP<br/>Consultation Statement</b>     | The Consultation Statement should confirm the extent of community involvement and associated activities which should include an analysis of outcomes and how they have influenced the current HNP. At present there is insufficient evidence of the extent of community engagement albeit a number of consultation activities have been undertaken. The methodology, results and actions arising from each activity should be provided in the Consultation Statement, including those between 2014 and 2018. |

|     |  |   |   |
|-----|--|---|---|
| 1.5 | Are arrangements in place for an independent examiner to be appointed?   | <b>No source</b>                              | <p>There is no information provided on this. Whilst the qualifying body has not yet reached the stage of submitting the HNP to NNDC under Regulation 15, it is advised that discussions could helpfully begin or be scheduled on how to identify a suitable independent examiner.</p> <p>Whilst the general approach is to assess the resumes/CVs provided by prospective examiners, you may also find it helpful in coming to a decision by reading examples of their reports on other Neighbourhood Plans.</p>  |
| 1.6 | Are discussions taking place with the electoral services team on holding the referendum?                                     | <b>No source</b>                              | It is not yet appropriate to put in place arrangements for a Referendum after the examination of the Plan. However, as the Plan continues to advance, discussions should be held with NNDC  |
| 1.7 | Is there a clear project plan for bringing the plan into force and does it take account of local authority committee cycles? | <b>No source</b>                              | There is no process set out for bringing the HNP into force. This could be developed in liaison with NNDC.  |
| 1.8 | Has a SEA screening been carried out by the LPA?   | <b>Holt NP</b>                                | <p>No SEA screening has been undertaken by NNDC.</p> <p>A Sustainability Appraisal which includes a SEA has been carried out by the TC (consultant).</p> <p>This must be completed before submission of the Plan, and therefore form part of, the HNP consultation. This should include clearer evidence of the liaison with key stakeholders such as Natural England, the Environment Agency and others. The content of the SEA should demonstrably inform the content of the draft plan.</p> <p>Consideration should be given to whether the SEA information provided at Regulation 14 was sufficient to meet the legal requirements at that stage.</p> |
| 1.9 | Has a HRA screening been carried out by the LPA?   | <b>Holt NP<br/>Basic Conditions Statement</b> | A HRA has been undertaken albeit its content is not fully accepted by NNDC. NNDC are willing to undertake a HRA (and SEA) for the Town Council. This offer should be  |



|  |  |  |   |
|--|--|--|---|
|  |  |  | <p>accepted. Again, consideration should be given to whether the HRA information provided at Regulation 14 was sufficient to meet the legal requirements at that stage.</p> <p>Attention is drawn to the fact that the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018 were made on 5 December 2018 and came into force on 28 December 2018. These amend the prescribed Basic Condition related to Habitats Assessments - the revised Basic Condition took effect from 28 December 2018. See the following link: <a href="http://www.legislation.gov.uk/uksi/2018/1307/contents/made">http://www.legislation.gov.uk/uksi/2018/1307/contents/made</a> (Section 3).</p> <p>This amendment follows the ruling of the European Court in People over Wind and Sweetman on 12 April 2018.</p> |
|--|--|--|---|

**Part 2 – Content**

|     | Criteria   | Source  | Response/Comments  |
|-----|--|---|--|
| 2.1 | Are policies appropriately justified with a clear rationale? | <b>Holt NP<br/>Basic Conditions<br/>Statement</b> | <p>The HNP has no Vision but does have a Mission Statement. It would be informative and helpful to set out how the Mission Statement has been derived, particularly with reference to any community engagement on the point. Clarification as to whether this represents the Vision for the parish would be helpful.</p> <p>The HNP has 7 objectives and 5 themes. It is unclear how and why these have been identified (eg from any consultation analysis) and this should be addressed. The Consultation Statement could helpfully set out in more detail how these were identified. The themes address: design/character, environment, tourism/employment, leisure/culture, infrastructure. Each Theme has a total of 14 associated policies.</p> <p>The policies are generally positive. However, there is a necessity to ensure that the policies are justified and are clearer<sup>12</sup> in their wording and purpose so as to aid future effective implementation.</p> <p>There is useful advice to be found here: <a href="https://neighbourhoodplanning.org/wp-content/uploads/Writing-planning-policies-toolkit-HK-071218-0907-COMPLETED-JS-complete-.pdf">https://neighbourhoodplanning.org/wp-content/uploads/Writing-planning-policies-toolkit-HK-071218-0907-COMPLETED-JS-complete-.pdf</a></p> <p>Each policy is clearly identified by a separated and colour coded text box. There is no doubt what constitutes proposed planning policy.</p> <p>Many of the policies would benefit (and require) review/redrafting to ensure that they have regard to national policy, are justified and capable of effective implementation. The supporting text to the policies of the HNP often does not cite sufficient evidence and quite frequently includes issues and subject matter which is broader than the eventual policy which follows. Generally there is a need for more focussed supporting text/justification of each specific policy.</p> |

<sup>12</sup> See PPG Reference ID: 41-041-20140306.

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|-----|---|---|--|
| 2.2 | Is it clear which parts of the draft plan form the 'neighbourhood plan proposal' (i.e. the neighbourhood <i>development plan</i> ) under the Localism Act, subject to the independent examination, and which parts do not form part of the 'plan proposal', and would not be tested by the independent examination? | <b>Holt NP</b>                                | <p>The HNP is supported by a contents table and runs to 96 pages. The document is legibly laid out.</p> <p>The Policies are clearly separated from 'Community Projects'. Subject to clarifications (as recommended) there is sufficient clarity as to what is the HNP and what will be the subject of examination.</p>   |
| 2.3 | Are there any obvious conflicts with the NPPF?  | <b>Holt NP</b>                                | Section 3 below identifies matters of potential conflict with the National Planning Policy Framework (NPPF) which should be resolved.  |
| 2.4 | Is there a clear explanation of the ways the plan contributes to the achievement of sustainable development?  | <b>Holt NP<br/>Basic Conditions Statement</b> | <p>The HNP is drafted in a broadly positive manner albeit there is scant reference in support of sustainable forms of development. The plan should be revised to explain clearly how the HNP will contribute to the achievement of sustainable development.</p> <p>The Basic Conditions Statement acknowledges the principle of sustainable development. However, there is insufficient detail provided, either within the HNP or in the Basic Conditions Statement, as to how this will be secured. More narrative explanation is required and recommended.</p> |
| 2.5 | Are there any issues around compatibility with human rights or EU obligations?  | <b>Holt NP<br/>Basic Conditions Statement</b> | There is little specific information on this point. From an assessment of the documents received there would appear to be no outstanding issues regarding compatibility with human rights albeit this must be explained further in an updated Basic Conditions Statement. For example, an equalities impact assessment could be completed.   |
| 2.6 | Does the plan avoid dealing with excluded development including nationally  | <b>Holt NP<br/>Basic Conditions Statement</b> | Yes, the HNP does avoid dealing with such excluded development, and there are no potential issues regarding this matter.   |

|     |   |   |   |
|-----|---|---|---|
|     | significant infrastructure, waste and minerals?   |   |   |
| 2.7 | Is there consensus between the local planning authority and the qualifying body over whether the plan meets the basic conditions including conformity with strategic development plan policy and, if not, what are the areas of disagreement? | <b>Holt NP Basic Conditions Statement</b> | <p>There is no current consensus between Holt TC and NNDC.</p> <p>This should be remedied (by further minuted meetings/correspondence) before submission. Any areas of obvious disagreement should be obviated or minimised. A statement of common ground would be helpful.</p> <p>The Town Council should consider the Locality advice on establishing a Memorandum of Understanding with NNDC (and others). A guide is available <a href="#">here</a>. This could subsequently lead to a Statement of Common Ground.</p> <p>It cannot be concluded at the present time that there are no potential issues of general non-conformity (i.e. disagreement) with the strategic development plan policies of the extant development plan (as flagged in Regulation 14 consultation comments). This matter should be addressed with additional details within the Basic Conditions Statement.</p> <p>Advice on the issue of 'conformity' is available <a href="#">here</a>.</p> |
| 2.8 | Are there any obvious errors in the plan?   | <b>Holt NP</b>                            | Some suggestions are made in Part 3 below.  |
| 2.9 | Are the plan's policies clear and unambiguous and do they reflect the community's land use aspirations?   | <b>Holt NP</b>                            | <p>Detailed comments are made below on the content and drafting of the HNP's Policies.</p> <p>Various policies would benefit from greater clarity to aid their implementation, and a further 'sense check' and potential refinement to ensure that they are clear land use policies and not general assertions of aspiration (which might be contained to a degree within the text of the HNP, balanced with the advice in the PPG<sup>13</sup>).</p>   |

<sup>13</sup> See PPG Reference ID: 41-004-20190509.

### Part 3 - Detailed Comments

1. These detailed comments address all matters, both of significance and of a more minor nature, across the current HNP and are presented in Page order.
2. Title page. The plan period should be reviewed/amended on the title page. For example, 'Holt Neighbourhood Plan 2021 – 2038'.
3. Page 3. The foreword could be reviewed to reflect the current priorities for the town and parish in the national context for sustainable development. The second paragraph could be more positively worded; as an example for consideration: "The Holt Neighbourhood Plan will have a positive impact on many aspects of possible improvements and future development. ~~We have to be realistic about housing in that the~~ *There is a necessity for more homes is nationwide and we can ensure that Holt's allocation will be well designed and appropriate.* ~~we shall not escape certain numbers being allocated to Holt. However,~~ *With a Neighbourhood Plan addressing topics such as character, style and size, we at least can guide planning influence development to suit the needs of our community. own residents and necessary infrastructure. We shall always have to compromise to some degree, but* The Holt Neighbourhood Plan will be a document which *supports sustainable development and* gives legal weight and good reasoning to our choices."
4. Page 4. The 2nd sub-heading refers to the protection of green space and the bullet points recite the criteria within the NPPF which relate to designated Local Green Space (LGS). However, the HNP does not subsequently include any such LGS nor does it refer to these criteria again. Consequently there is an inconsistency between the foreword and the content of the plan which should be resolved.  
  
The foreword includes a 'Vision for Holt'. However, this Vision is not subsequently reiterated within the HNP which includes a Mission Statement. It would be helpful to explain how the Vision was derived (for example with reference to community consultation and feedback etc) and how that relates to the Mission Statement.
5. Page 5. It would be helpful if the map of the designated boundary was more clearly presented and the date of designation should be included.
6. Page 6. A contents page is always helpful and good to see.
7. Page 8. Paragraph 2.1.4 (and elsewhere) should be updated to reflect the passage of time since the HNP was drafted. For example, it could say that the HNP covers a period to 2038 with a review intended every 5 years.
8. Page 11. Section 2.3 rehearses the Holt Vision Document. This section could be more clearly explain why it is relevant to the HNP (for example, how has it informed the work undertaken for the HNP (if it has)?).

9. Pages 12-18 explains how the HNP process has been undertaken leading to referendum. There is scope to edit and reduce the length of this narrative which does not add substance to the content of the plan itself. For example, a shorter summary could cross reference the Consultation and Basic Conditions Statements where the details could be contained.

Map 3 repeats Map 1 and seems unnecessary.

Paragraph 2.6.2 repeats paragraph 2.5.2 unnecessarily.

Paragraph 2.7.2 refers to a community survey in 2014. The details of the survey, its responses, the analysis and conclusions drawn should be referenced and provided in evidence. The current version of the Consultation Statement does not include sufficient detail of this key activity and should be updated.

Similarly, paragraph 2.7.3 refers to workshops led by Planning Aid. It would be helpful to include the details of these and their outcomes in the Consultation Statement. The Consultation Statement does not contain substantive details of how the early engagement work was undertaken; for example, HNP paragraph 2.7.5 refers to articles in The Chronicle but these (from 2014) are not included. Screenshots of the early website would be helpful, plus details of the letter sent to businesses and households.

The Consultation Statement should also explain the apparent hiatus of activity between 2014 and the Community Consultation Event in June 2017. A narrative explanation with reference to the feedback received should be provided explaining how the Mission Statement, objectives and themes were derived – this will helpfully provide the evidence for the Examination as to how the priorities of the HNP have been selected with due engagement with the community.

10. Page 19. The derivation method for the Mission Statement should be explained (ie with reference to the community survey and other feedback). Additionally the relationship between this Statement and the Vision on page 4 should be clarified.
11. Page 20. Similar to above, the derivation of the specific objectives should be explained briefly within the text (with any cross referencing to the Consultation Statement). For example, the analysis of the survey and other community feedback could be cited in support of the 7 objectives identified. It would also be helpful to set out how the Vision/Statement and the objectives informed the identification of the 5 policy themes within the plan. The objectives do not explicitly include any reference to the natural environment which may represent an omission, particularly in light of the

*environmental objective* which underpins national policy (see NPPF paragraph 8) and the specific content of the HNP which, in places, incorporates matters affecting the natural environment.

The relationship of the sections of the plan to one another is critical if the HNP is to be effective in its operation: essentially, the Vision/Mission Statement is delivered by ensuring the Objectives are met. To meet the Objectives the HNP has identified 5 Themes within which individual policies are located. The implementation of the policies should ensure the Themes are addressed, the Objectives are met and the Mission Statement delivered. Therefore there is scope to diagrammatically illustrate this relationship within the plan feasibly supported by a table along the following lines:

| <b>Mission Statement</b>   | <b>Objectives</b>  | <b>Themes</b>        | <b>Policies</b>   | <b>Monitoring Indicators</b>  |
|--|--|----------------------|---|---|
| As the gateway to the North Norfolk coast, Holt will be recognised as an historic market town, based in a rural setting with a vibrant town centre. Harnessing its growth potential, whilst retaining a strong local identity and distinctiveness. | 1) to preserve the character of Holt, including the spatial balance between the rural, built and historic environment, character and ethos whilst improving design based on styles in keeping with the locality. | Design and Character | Policy 1 Design and Character<br><br>Policy 2<br><br>Policy 3<br><br>Policy 4 | To be devised (possibly in association with NNDC)<br>Eg: proportion of developments incorporating 1 and 2 bedroom homes.<br><br>etc |
|  | 2) etc   | etc                  | etc   | etc   |

12. Page 21. Section 5 of the HNP refers to ‘sustainable growth and development’. There is an opportunity here to explicitly confirm (with reference to the updated NPPF) that the plan seeks to contribute to the achievement of sustainable development thereby affirming that the relevant Basic Condition will be satisfied.

To maintain a tone of positivity, paragraph 5.3 could simply say: “The HNP is not anti-development and the community understands the need to accommodate housing growth...”

13. Pages 22 – 27. Section 6 is helpful in principle but could be shorter and needs to be updated to reflect the progress of NNDC on its new Local Plan and feasibly with regard to land that may have been developed over the last two years. The accuracy of Map 4 should be verified with NNDC.

Paragraph 6.4 seems unduly long and the purpose of its inclusion could be clearer. If the purpose is to illustrate that the HNP has had due regard to the existing development plan then this could be more succinctly summarised with the detail (as shown in the blue table) relocated to the appropriate section of the Basic Conditions Statement.

14. Page 28. The emerging Local Plan will have developed further since the current version of the HNP was produced. Consequently, Section 6.5 should be updated to reflect any changes that affect Holt (including the intended adoption date which is likely to be 2022 onwards).

15. Page 29. Map 5 may require updating in line with the emerging version of the Local Plan. The boundary positions shown on Map 6 should be double checked.

16. Chapter 7 of the HNP contains the policies of the plan set within its 5 themes. As noted above, the rationale for the themes should be explained (eg, why these 5 in particular, were they derived from the community engagement exercises?). Structurally, Chapter 7 takes each theme in turn and provides narrative supporting text/supporting reasoning for the individual policies which follow. This is of critical importance in justifying the content of the plan and it should always ensure that it is cogent, cohesive and is supported by sufficient evidence of why policies are required and how they will be effective in their implementation. These sections should be reviewed for their clarity and relevance to the policies which follow.

It is important to note that as part of any Examination, the policies will be scrutinised particularly in relation to how they meet the expectations of the government's PPG which sets out that "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. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared."<sup>14</sup>

Furthermore, Localities publish helpful advice<sup>15</sup> on how to write planning policies which includes some top tips on how to construct an effective policy and how to ensure it is linked to the vision and objectives. This includes:

- The need to avoid duplication with issues covered elsewhere in the development plan;

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<sup>14</sup> PPG Reference ID: 41-041-20140306..

<sup>15</sup> <https://neighbourhoodplanning.org/toolkits-and-guidance/write-planning-policies-neighbourhood-plan/>



- The need to be clear and precise (keep things simple); and
- The need to ensure policies are supported by evidence.

The advice also contains some examples of possible policy wording which may be helpful including the following structural suggestion:

- Introduce each policy with a short explanation that provides any necessary context and robust evidence behind its inclusion;
- Summarise the intent of each policy;
- Word your policies clearly and concisely;
- Visibly separate the actual policies from other text – many plans use boxes and/or put policy text in bold/italics; and
- Clearly number the policies to aid navigation around the plan - it is customary to use the letters relating to the different topics – e.g. Housing policies are numbered H1, H2, H3; Open Space policies are numbered OS1, OS2, OS3 etc.

As currently presented the HNP policies do not universally meet these requirements. It is recommended that each of the policies of the HNP be subject to a review with this advice in mind.

### **Design and Character**

17. Pages 32-42 are the explanatory text and reasoned justification for Policies 1-4 which follow. This section is important in explaining why the policies are required and in setting out the evidence which supports their individual content. As currently presented, pages 32-42 contain a raft of narrative which would benefit from a clearer structure and presentation. For example, the transition from an explanation of Building for Life 12 (paragraphs 8.6-8.11) to population demographics (paragraph 8.12 onwards) is not clear in terms of the narrative that the Plan is explaining and which ultimately should support Policy 1. It is possible that the use of sub-headings would be helpful (eg Importance of Design within Holt, Demographics and Design, etc) albeit there would be benefits to reviewing the intent of the Themes and the suitability of the topic matter which is included within each.
18. The content of the supporting text should be checked and updated, particularly the latest housing need figures which will have altered (due to changes in the method of calculation) since the HNP was drafted. The provision of hyperlinks or signposting to where the supporting evidence can be found is necessary (paragraph 8.42). The evidence base of NNDC in support of its emerging Local Plan will likely be helpful.
19. Policy 1 itself consists of 13 separate bullet points which represent criteria that new development will be expected to meet. However, the policy is broad in its content, seeking to address general design considerations, house size and development mix, affordability and occupation, access and roads, water infrastructure and arboricultural matters. Consideration should be given to refining the policy, feasibly into two (or more) where issues of

physical design (eg bullets 1, 2, 3, 4, 8, 9, 10) are dealt with separately from housing size and occupation (eg bullets 3, 5) and infrastructure matters (eg bullets 4, 12, 13).

20. Regardless, the criteria themselves should ensure that they do not repeat either national policy or existing development plan policy as this would be unnecessary.<sup>16</sup> For example, bullet point 2 repeats the statutory provisions which apply to development in Conservation Areas and therefore is not required in a planning policy; furthermore, the NPPF already requires that good design should contribute towards high quality buildings and places (paragraph 124). The policy criteria should be evidentially relevant to Holt which would ensure that the objectives and mission statement of the HNP are capable of being delivered. For example, bullet point 1 is a general assertion that design should reinforce a strong sense of place but there is no substantive reference in either the policy or in the supporting text as to what that sense of place may consist of (for example reference to any character appraisal of the town or analysis of local building forms). It is recommended that this be reviewed to ensure that the design aspirations of the HNP are clearly set out within the Holt context so that decision makers and developers are clear as to what is likely to be required in terms of appropriately designed new developments. Further liaison with NNDC on the content of each policy would be prudent to ensure that the HNP does not repeat (or potentially unjustifiably conflict) with the existing development plan (or indeed the emerging Local Plan as far as is relevant).
21. As alluded to above, the retained criteria must be justified by evidence. Therefore the specific criteria which require a garage in the curtilage of each dwelling or requiring all new roads to an adoptable county standard should be explained. Currently, there is a risk that such aspirations are not justified, not deliverable and would not contribute to an effective plan. For example, if the purpose of requiring a garage is to ensure adequate off street parking to maintain the character of the town, then this should be stated but, if so, the policy may require amendment to simply require adequate off street parking rather than a specific garage.
22. Policy 2 relates to 'Dementia Friendly Communities'. This is clearly relevant to Holt albeit there is scope for the policy to be more strongly worded: for example "Development proposals will be expected to incorporate the principles of dementia friendly communities unless demonstrably impractical, ...etc".
23. Policy 3 relates to 'Residential Care Accommodation'. The policy is broadly supported by the assertions in the supporting text (paragraphs 8.12-8.15) but this should be refined further with evidence of the particular needs which may apply to Holt or at the very least North Norfolk, drawing on the most recent statistical support that exists. At present the policy is generally supportive of new residential care provision but it is unclear what the level of need is and why a specific policy is therefore required in the HNP. Ideally, the policy should be supported by specific evidence of needs for this type of

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<sup>16</sup> NPPF, paragraph 16 f).

housing (eg a local housing needs survey perhaps?). Critically, the final sentence of the policy requires evidence of identified local needs but how this is to be demonstrated is not explained whilst the reference to other policies of the development plan (here and elsewhere) is unnecessary (as all relevant policies apply to all schemes at all times).

24. Policy 4 relates to 'Affordable Housing' and introduces the concept of a local lettings policy for the allocation of homes to Holt parish residents. As noted above, the HNP should be reviewed to assess whether a policy on affordable housing is best located within a theme/section of 'Design and Character'. Nevertheless, this will be a critical policy for any future examination where the evidence for its inclusion and content will be scrutinised. While the intention of the policy is clear, the justification for its detail is not. It is noted that NNDC raised reservations on its content and its relationship with the existing and emerging policies of the development plan, including Core Strategy policy HO2. Therefore, the wording of the policy must be explicitly supported by local evidence (eg the rationale for up to 25% and the nature of the 'cascade'). It is recommended that further liaison with NNDC be undertaken to seek a mutually beneficial policy proposal that will be robust at the point of HNP Examination.

### **Environment**

25. Pages 47-55 provide the supporting justification to Policies 5, 6 and 7. Paragraph 9.2 helpfully refers to the public perception of landscape value and this should be reinforced with a particular citation of the evidence (feasibly with a cross reference to the Consultation Statement). Similarly, paragraphs 9.15 and 9.16 identify the importance of connectivity and access to the countryside which should be supported with evidence from the public engagement exercises.
26. The HNP does not identify any Local Green Spaces (LGS) as provided for by the NPPF (paragraphs 99-101). Alternatively, Table 1 identifies a number of 'important open spaces' but the evidence for how these were selected is absent (not listed at paragraph 9.31) and should be provided. Furthermore, the relationship between Policy 6 of the HNP and Policy CT1 of the Core Strategy should be more clearly set out – for example it is not clear how the HNP 'important open spaces' equate to the land protected by Policy CT1. This should be clarified and, if practical, agreed with NNDC.

However, Table 1 includes open spaces which may satisfy the LGS criteria. It is recommended that the HNP is reviewed in this respect, particularly as to whether the formal designation of LGS is likely to provide greater protection for identified spaces. Should the HNP wish to designate LGS, further evidence would be required setting out how the spaces were selected with due regard to the criteria of national policy; helpful advice is available [here](#) and NNDC have produced a guide available [here](#).

27. Policy 5 supports biodiversity. However, it could be more forcefully constructed (to reflect provisions in the Environment Bill)<sup>17</sup> to require biodiversity gains relevant to (and within) the parish. NNDC may be able to assist on this point.
28. Policy 6 could be amended to reflect the creation of LGS designations if applicable and would thereby distinguish itself from the provisions of the current development plan (policy CT1).
29. Policy 7 relates to heritage protection but as worded is a generic policy that repeats the provisions of national policy and the development plan. It is therefore unnecessary and could be deleted. Alternatively, it should be amended to be more specific to Holt and its assets.

### **Tourism and Employment**

30. Pages 58 to 62 establish contextual background to the economy within Holt. Whilst some of the information is helpful, the section would benefit from further review to ensure it is specific to Holt, supported by publicly available evidence and is clear in how it relates to the policies of the HNP.
31. Paragraph 10.1 should make clear who identifies Holt, Cromer and Sheringham as performing complementary roles (NNDC, Chamber of Commerce, TC?).
32. Paragraph 10.9 refers to a 2017 town centre uses study which is now rather old evidence. Ideally this should be updated by a specific analysis of Holt town centre which could show vacancy rates, retail uses etc. Overall, the purpose of paragraphs 10.9 to 10.14 should be more clearly explained, particularly in relation to the policies which follow. At present the HNP is rather repeating national policy and providing statements of fact without consequential analysis.
33. Paragraph 10.15 requires amendment to ensure it is cogent.
34. The evidence referred to within paragraph 10.19 needs to be publicly available and signposted (eg A Vision for Holt, the Holt Emerging Policy Statement Discussion Document et al).
35. Policy 8 relates to 'Employment Growth'. The policy supports new employment with the exclusion of new hotel accommodation but the reasoning for this should be set out in the supporting text. The reference to other policies of the development plan is unnecessary and should be omitted. The 4<sup>th</sup> bullet point also requires further explanation with reference to any available evidence. For example, the policy only supports small scale development

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<sup>17</sup> View progress here: [Environment Bill - Parliamentary Bills - UK Parliament](#)

on existing employment sites but this does not explicitly align with national policy which does not restrict the scale of development which, in this instance, would be controlled to a degree by bullet point 1. This should be reviewed for consistency with national policy and the development plan, avoid repetition and be amended as necessary.

36. Policy 9 relates to hotel accommodation but would benefit from further explanation in the supporting text as to why its requirements are necessary and how it relates to (and is in general conformity with) Core Strategy Policy EC7. Furthermore, there appears to be a typo in the use of the word 'boundary/boundaries'. The reference to other policies is once again unnecessary and the policy should ensure it does not simply repeat other provisions of the development plan (eg Core Strategy Policy EC7).

### **Leisure and Culture**

37. Pages 65-69 provide the context for Policies 10 and 11. However, page 65 repeats information on the age structure of the community already cited in the HNP. This should be revised.
38. Paragraph 11.4 refers to NPPF paragraph 17, but this has been updated and the HNP should be revised accordingly.
39. Paragraphs 11.15-11.18 refer to playing fields and open spaces which appear to overlap with those referenced within the Environment section of the HNP, for example the Kelling Road Sports Club and the Methodist Memorial Gardens. Such overlap should be clarified, feasibly by ensuring a single reference is made within the plan linked, for example, to the identification of LGS.
40. Policy 10 supports the provision of additional community facilities. There is beneficial scope to edit the policy to be more focussed on the needs of Holt if they are quantifiable (eg new facilities) – is there evidence of local needs in this respect? This will ensure the policy is distinct to the community. The reference to other policies is unnecessary.
41. Policy 11 could replace 'the Developer will be required to demonstrate' with 'development proposals must include' to be more effective in its implementation.

### **Infrastructure**

42. Pages 71 -74 provide the context for Policies 12-14. The references within this section to the NPPF need to be updated as does the reference to the Better Broadband for Norfolk initiative (paragraph 12.7).

43. Policy 12 supports the roll out of superfast broadband. The policy is rather generic and could be more targeted in its content. For example, it could explicitly state that proposals for such development will be supported (albeit subject to acceptable impacts on amenity and character) and could consider whether provision should be made within new developments for infrastructure to accommodate appropriate technologies.
44. Policy 13 should be reviewed as it is unclear precisely what is required in terms of traffic quantification (traffic assessment/statement?) and why a threshold of 11+ dwellings has been set. National policy should be considered in setting the terms of Policy 13 as the former refers to significant and unacceptable impacts arising from development on the highway network. Liaison with the Highway Authority and NNDC on the policy wording may be fruitful to ensure the policy adds value to the development plan, has due regard to national policy and will be effective in its operation.
45. It is unclear why Policy 14 (healthcare) is currently required. For example, are there quantifiable deficiencies now (or in the future) which could be evidenced by the supporting justification and addressed by the HNP Policy requirements? As currently presented, the policy does not secure any specific level of additional health infrastructure.

#### **Delivery, Implementation and Monitoring**

46. It is good to see a delivery and implementation section within the HNP. However, it is unclear as to how the policies will be monitored for their success in contributing to the vision for the town. Feasibly specific monitoring indicators could be devised for each Theme/Policy which can be reviewed to assess the success of the plan and its potential need for amendment in the future.
47. The glossary, whilst helpful in principle, is too long and should be reviewed to ensure its definitions are justified (for example 'affordable housing' is defined in the NPPF; terms such as 'curtilage' have no need to be defined in the HNP etc).

#### **Basic Conditions Statement**

48. The available Basic Conditions Statement is dated August 2019 and runs to 38 pages excluding the appendix. The Statement will require updates to reflect the passage of time that has elapsed up until the point of submission to NNDC.

In particular, Section 3 and Tables 1 and 2 will need to be revised to incorporate changes that may have occurred with regard to the emerging Local Plan of NNDC and to review how regard has been had to the NPPF. Liaison with NNDC is recommended on these matters.

The applicable Basic Conditions that must be met by the HNP exclude items b) and c) of paragraph 3.2 and consequently analysis is not necessary in paragraphs 3.11 to 3.16.

The Basic Conditions Statement should include evidence of how the plan is compatible with Human Rights and therefore paragraph 3.37 requires expansion; NNDC may be able to advise further on this matter.

### **Consultation Statement**

49. The Local Plan Regulations require the submission of a consultation statement alongside the HNP to NNDC. A Consultation Statement should (see the Neighbourhood Planning Regulations) fulfil the following:

- (a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- (b) explains how they were consulted;
- (c) summarises the main issues and concerns raised by the persons consulted; and
- (d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

The available Consultation Statement is dated August 2019, acknowledges the regulatory requirements and runs to 24 pages excluding appendices.

The current statement requires further updates to reflect the passage of time. In addition, the Executive Summary at paragraph 1.3 highlights three key messages arising from the local community:

- Affordability of new homes and access to affordable housing;
- Town centre parking; and
- Pedestrian accessibility from the other side of the bypass and suitability of footpaths for those with mobility difficulties in the town centre.

However, these matters are largely not addressed within the HNP and therefore there appears to be a disconnect between the Consultation Statement summary and the HNP, specifically in that the final Plan does not address the community issues. This should be resolved.

Sections 3 and 4 of the Consultation Statement describe the creation of a Communications Strategy and the timeline of activities undertaken in producing the HNP. However, at present there are gaps in the detailed evidence of how consultation was undertaken, when and with what results. This should be rectified in an updated Consultation Statement. Ideally, the Consultation Statement should explain how the communications strategy was applied to the stages of HNP production, including the activities from 2013-2017. For example, the table at 4.2 refers to articles within the Holt Chronicle but Appendix 6 only contains examples from 2017/2018 which omits the early stages of community engagement. This should be supplemented by evidence of how the community were engaged throughout the HNP process.

Similarly, the website screenshots only relate to 2018 and presumably additional evidence can be provided of how the internet was used to publicise the HNP and how engagement was sought/received. This should be included.

A narrative description of what comments were received and how they informed the mission strategy, objectives, themes and policies of the plan should be added to Chapter 4; this would expand the summary comments of the tables provided which refer to the responses received (with only limited detail). Evidence should be provided (in appendices) detailing in particular the responses and outcomes of the engagement activities (including those before 2018); for example, where is the evidence which supports the summary table of 4.16 to 4.18 (Policy Development Workshops etc)?

Section 5 of the Consultation Statement addresses the Regulation 14 Consultation. An expansion of the narrative on pages 21-24 is recommended. This should provide more explanation and detail about the responses received and how they were assessed, considered and how the HNP was altered as a result. Whilst the comments are contained in Appendix 13, the bullet point summary of main issues/concerns is a limited list which, for example, does not explicitly reference the environment or tourism (which are key policy themes in the plan) which is anomalous.

The Consultation Statement is an opportunity for the Town Council to tell the story of why the HNP has been produced and how it has engaged with the community in creating a plan which responds to local concerns. Consequently, the necessary redraft of the submission Consultation Statement should take the opportunity to explain cohesively how the HNP meets the regulatory requirements and is shaped by its own community.



### **SEA**

50. The HNP is accompanied by a Sustainability Appraisal. Appendix A of the SA includes a Strategic Environmental Screening Determination (SEA) which concludes that the HNP would be unlikely to have any significant environmental effect and will not require a Strategic Environmental Assessment. Whilst some of the information within the Appendix is broadly helpful, there is no evidence of the detailed responses from the consultation bodies (Natural England, Historic England and the Environment Agency) in relation to the SEA Screening, instead the general comments of these bodies in relation to the HNP Scoping Report are incorporated into the final version of the Scoping Report where no clear reference is made to the SEA Screening. This is therefore unclear and it is uncertain as to whether the Regulations have been satisfied. Furthermore, NNDC remain to be satisfied that the SA objectives were appropriately selected and that the SEA Screening is sufficiently robust to support the plan. As previously noted, a view will need to be taken as to whether the SEA information provided at Regulation 14 was sufficient to meet the legal requirements at that stage.

It is recommended that the SEA Screening is undertaken in liaison with NNDC and that appropriate consultation is clearly undertaken and reported upon.

### **HRA**

51. A HRA Screening Report has been prepared to accompany the HNP (August 2019) which concludes that there is likely to be no significant negative effects on the European Designated Sites arising from the HNP. Natural England agree with that outcome.

The report relies heavily on previous work undertaken in support of the NNDC Core Strategy and the Norfolk Strategic Framework. This work is somewhat dated and the HRA Report does not provide any more recent evidence of environmental assets and potential considerations, for example, the emerging Local Plan.

The HRA requires further update to reflect the passage of time and to ensure it is evidentially robust. Liaison with NNDC is recommended and a view will need to be taken as to whether the HRA information provided at Regulation 14 was sufficient to meet the legal requirements at that stage

### **General**

52. The main focus of this report has been on undertaking an assessment of the HNP, and in particular its policies, in its current draft form.

53. It is understood that there may be other matters that the TC may consider to be included within the HNP. If so, these should be considered and supported by evidence before their inclusion which may necessitate further public consultation before final submission to NNDC.

**Andrew Seaman**  
**Examiner**

## **Appendix 3. Draft MoU.**

### **Neighbourhood Planning**

Memorandum of Understanding (MoU) between

Holt Town Council (HTC) and North Norfolk District Council (NNDC)

Date: xx May 2021

#### **Introduction**

MoUs are recognised as being a useful tool to aid the efficient production of a neighbourhood plan (NP). A MoU is designed to clarify the expectations and the working relationships between key parties involved in the preparation of a neighbourhood plan. This MoU is based on the template clauses recommended by Locality in its ‘toolkit for neighbourhood planners: Developing a Memorandum of Understanding’<sup>18</sup>.

#### **Holt Neighbourhood Plan and North Norfolk District Council**

Holt Town Council (HTC) is intending to update and submit its neighbourhood plan to NNDC as soon as practical.

This MoU aims to put working relationships on the best possible footing and is designed to be both a practical and aspirational document that sets out how to successfully complete the submission of the Holt NP and move to the referendum stage.

The clauses below represent the in-principle agreement on how the next stages of plan preparation can be effectively completed.

It does not attempt to influence the content of the NP but does recognise the value of a collaborative approach where the crucial support of NNDC to HTC can be delivered in a positive and timely fashion whilst, in return, the HTC can ensure it is engaging clearly and co-operatively with NNDC to the benefit of its community and a clear development plan.

#### **Signatories**

.....

On behalf of Holt Town Council

.....

On behalf of North Norfolk District Council

Xx May 2021

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<sup>18</sup> <https://neighbourhoodplanning.org/toolkits-and-guidance/developing-memorandum-understanding/>

## **Clauses**

### **Section 1: Working Relationship**

1.0 HTC and NNDC across all its departments seek an open and constructive relationship in relation to both strategic (such as the emerging Local Plan) and neighbourhood planning issues. This is expected to lead to regular and informed contact on matters of relevance to neighbourhood planning.

The parties to this memorandum seek:

- An open and constructive working relationship;
- To respect each others' views and, where these differ, after discussion ensure proper understanding of the reasons for such differences;
- To have a 'no surprises' policy, based on notifying each other well in advance, where possible, of significant announcements and developments in policy;
- To minimise duplication of activity wherever possible; and
- To inform other relevant stakeholders about our relationship so as to reduce uncertainty.

### **Section 2: NNDC 'Duty to advise and assist'**

2.0 As a minimum NNDC will meet its statutory duty to HTC as defined by Paragraph 3 of Schedule 4B of the Town and Country Planning Act 1990. This will include, but is not limited to:

#### **Preparation Phase (timely support to be provided to assist the delivery of the HTC Project Plan)**

- Provision of details and electronic copies and reasonable explanation of existing and emerging local planning policy;
- Providing electronic copies of any existing relevant evidence base;
- Providing copies of Ordnance Survey maps to an appropriate scale;
- Providing advice on the regulations and legislation;
- Advising what needs to be produced in order to comply with EU obligations (under retained EU law);
- Ensuring appropriate Officer attendance at any workshops/meetings to brief the HTC on the local plan context, stage and direction;
- Providing a screening opinion in relation to the Habitats Regulation Assessment (HRA) and Strategic Environmental Assessment (SEA) at the earliest opportunity after a full draft plan is developed and advise on a Scoping Report if required;
- Providing links to useful guidance, websites, published research studies, support bodies and networks;

- Advising on necessary consultees for SEA/HRA and other purposes; and
- Providing timely advice to ensure the draft plan or order complies with the Equality Act 2010.

### **Submission Phase**

- Confirm that the draft plan meets the criteria in the Localism Act<sup>19</sup> (following Regulation 15) – [X] weeks [insert number] following submission to NNDC;
- Publicise the submission plan and other relevant documentation (Regulation 16) – within [X] weeks of receiving the submission documents which meet the criteria and pass on representations to the Independent Examiner within [X] weeks of the close of the consultation period (Regulation 17);
- Identify up to three potential examiners and appoint one of these in agreement with the HTC:
- Undertake final checks of the plan for legal compliance;
- Submit the draft plan and supporting documents to the Independent Examiner (Regulation 17) – within [X] weeks of close of pre-submission publicity period;
- Consideration of the recommendations in the Examiners' Report, that the draft plan meets the basic conditions and publication of a 'Decision Statement' (Regulation 18/19) – [X] weeks following the receipt of the Examiner's report;
- Make arrangements, including the setting of a date for the holding of the referendum – within [X] days of the publication of the decision statement including naming a Project Officer for electoral services;
- Verify the selection of the electoral base with the HTC; and
- Making of the plan (Regulation 19/20) – at the first available meeting of cabinet/ planning committee/council (delete as applicable) following a positive referendum vote.

2.1 The lead individual for the HTC will be (insert name and contact details). This person will endeavour to keep in regular contact with NNDC, this being not less than monthly. The lead officer for NNDC will be (name/details). Direct requests for information from NNDC/HTC shall be responded to within 10 working days.

2.2 Full meetings of the HTC in relation to HNP items will normally be open to the NNDC Lead Officer, and Local Councillors as de-facto members, notwithstanding the right of the Qualifying Body (QB) to sometimes meet without those parties being present;

2.3 NNDC will initiate and service an annual monitoring meeting with the QB to review progress in meeting the policies of the made neighbourhood plan and also respond to enquiries from the HTC within 10 working days in relation to progress.

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<sup>19</sup> The Localism Act inserts Schedule 4B into the Town and Country Planning Act 1990 (as amended) – see paragraphs 5 and 6.

2.4 In addition to the above NNDC will, subject to resources, provide practical assistance within 15 working days with regards to:

- The drafting of NP policies on request;
- Advice on the general conformity of policies within the neighbourhood plan with the strategic policies of the development plan;
- The signposting/provision of relevant evidence held or produced by NNDC; and
- Comments relating to any draft review of NP revised chapters/policies on reasonable and timely request in line with the HTC Project Plan - (see below)

### **Section 3 - HTC commitment to engage with its community**

3.0 HTC undertakes, as always, to use a wide range of engagement and communications channels and techniques to listen to and hear from all sections of the community throughout the neighbourhood planning process.

3.1 HTC will produce a project plan with timescales which will form the basis of its consultation with its community and with NNDC.

3.2 “The HTC monthly meetings are held regularly. The Neighbourhood Plan shall be a frequent item on the agenda. The meetings are well-advertised and take Public questions, verbally, or in writing prior to the meeting, and are always open to the Community. The Finishing Group shall present a Neighbourhood Plan update, whenever on the agenda, and issue relevant articles as necessary throughout the year. NNDC have a full list of HTC meetings and can, therefore, plan forward so that they can attend when appropriate.”

### **General Provisions**

Nothing in this memorandum shall fetter either party in exercising their statutory duties and powers. Nor does it prevent either party from exceeding the minimum level of service stated, either voluntarily or by the specific agreement of both parties.

Final MoU to be signed (as discussed and verbally agreed with HTC and NNDC)

**Neighbourhood Planning**

Memorandum of Understanding (MoU) between

Holt Town Council (HTC) and North Norfolk District Council (NNDC)

Date: 11<sup>th</sup> June 2021

Document control –

|            |   |
|------------|---|
| V1         | Received discussed NNDC 19.5.21   |
| V2 19.5.21 | Updated with tracked changes and time lines – IW NNDC                               |
| V3 1/6/21  | Amended with regard to HTC feedback -AS (IPe)                                       |
| V4 2/6/21  | Amended to reflect discussion with IW NNDC – AS (IPe)<br>Discussed with HTC 10.6.21 |

**Introduction**

MoUs are recognised as being a useful tool to aid the efficient production of a neighbourhood plan (NP). A MoU is designed to clarify the expectations and the working relationships between key parties involved in the preparation of a neighbourhood plan. This MoU is based on some of the template clauses recommended by Locality in its ‘toolkit for neighbourhood planners: Developing a Memorandum of Understanding’<sup>20</sup>.

**Holt Neighbourhood Plan and North Norfolk District Council**

Holt Town Council (HTC) is intending to update and submit its neighbourhood plan to NNDC as soon as practical.

This MoU aims to put working relationships on the best possible footing and is designed to be both a practical and aspirational document that sets out how to successfully complete the submission of the Holt NP and move to the referendum stage.

The clauses below represent the in-principle agreement on how the next stages of plan preparation can be effectively completed.

It does not attempt to influence the content of the NP but does recognise the value of a collaborative approach where the crucial support of NNDC to HTC can be delivered in a positive and timely fashion whilst, in return, the HTC can ensure it is engaging clearly and co-operatively with NNDC to the benefit of its community and a clear development plan.

**Signatories**

.....

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<sup>20</sup> <https://neighbourhoodplanning.org/toolkits-and-guidance/developing-memorandum-understanding/>

On behalf of Holt Town Council

.....

On behalf of North Norfolk District Council

11<sup>th</sup> June 2021

## **Clauses**

### **Section 1: Working Relationship**

1.0 HTC and NNDC across all its departments seek an open and constructive relationship in relation to both strategic (such as the emerging Local Plan) and neighbourhood planning issues. This is expected to lead to regular and informed contact on matters of relevance to neighbourhood planning.

The parties to this memorandum seek:

- An open and constructive working relationship;
- To respect each others' views and, where these differ, after discussion ensure proper understanding of the reasons for such differences;
- To have a 'no surprises' policy, based on notifying each other well in advance, where possible, of significant announcements and developments in policy;
- To minimise duplication of activity wherever possible; and
- To inform other relevant stakeholders about our relationship so as to reduce uncertainty.

### **Section 2: NNDC 'Duty to advise and assist'**

2.0 As a minimum NNDC will meet its statutory duty to HTC as defined by Paragraph 3 of Schedule 4B of the Town and Country Planning Act 1990. This will include, but is not limited to:

#### ***Preparation Phase (timely support to be provided to assist the delivery of the HTC Project Plan)***

- Provision of details and electronic copies and reasonable explanation of existing and emerging local planning policy;
- Providing electronic copies of any existing relevant evidence base;
- Providing copies of Ordnance Survey maps to an appropriate scale;
- Providing advice on the regulations and legislation;



- Advising what needs to be produced in order to comply with EU obligations (under retained EU law);
- Ensuring appropriate Officer attendance at any workshops/meetings to brief the HTC on the local plan context, stage and direction;
- Providing a screening opinion in relation to the Habitats Regulation Assessment (HRA) and Strategic Environmental Assessment (SEA) at the earliest opportunity after a full draft plan is developed and advise on a Scoping Report if required;
- Providing links to useful guidance, websites, published research studies, support bodies and networks;
- Advising on necessary consultees for SEA/HRA and other purposes, including undertaking the necessary consultation on the screening opinions.

### **Submission Phase**

- Confirm that the draft plan meets the criteria in the Localism Act<sup>21</sup> (following Regulation 15) and has regard to the submission validation requirements contained in the published NNDC neighbourhood planning submission check sheet – usually 2 weeks following submission to NNDC; (no assessment is made on whether the Draft Plan meets the Basic Conditions).
- As soon as reasonably possible after receiving the validated submission documents and examination material NNDC will publicise the Draft Plan in accordance with the regulations, appoint an Examiner and provide the appropriate supporting documentation. The timing of the appointment is a matter of judgment for the Council. The aim is to ensure that the chosen examiner has sufficient availability to commence the examination in the coming weeks after the minimum 6-week period for representations has closed.
- The appointment will be preceded by a process to identify an appropriately qualified and independent examiner, such as by seeking ‘expressions of interest’ (Eoi) including the involvement of HTC. The process will take approximately 6-7 weeks including a 4 week response time for Eoi.
- Consideration of the recommendations in the Examiners’ Report, that the draft plan meets the basic conditions and publication of a ‘Decision Statement’ (Regulation 18/19) The Decision Document must be published

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<sup>21</sup> The Localism Act inserts Schedule 4B into the Town and Country Planning Act 1990 (as amended) – see paragraphs 5 and 6.

within 5 weeks following receipt of the Examiners final report, or at an alternate time agreed with the QB (note this is in line with the regulations).

- Make arrangements, including the setting of a date for the holding of the referendum. NNDC will aim to hold the referendum in line with the regulatory requirements within 56 working days following issue of the Decision Document, or at an alternate time agreed with the QB.
- Verify the selection of the electoral base with the HTC; and
- Making of the plan (Regulation 19/20) – at the first available meeting of cabinet-following a positive referendum vote.

2.1 The lead individual for the HTC will be (Gemma Harrison/Clerk). This person will endeavour to keep in regular contact with NNDC, this being not less than monthly. The lead officer for NNDC will be (Iain Withington, planning policy Team leader). Direct requests for information from NNDC/HTC shall be responded to within 10 working days.

2.2 Full meetings of the HTC in relation to HNP items will normally be open to the NNDC Lead Officer, and Local Councillors as de-facto members, notwithstanding the right of the Qualifying Body (QB) to sometimes meet without those parties being present.

2.3 In addition to the above NNDC will, subject to resources, provide practical assistance within 15 working days with regards to:

- The drafting of NP policies on request;
- Advice on the general conformity of policies within the neighbourhood plan with the strategic policies of the development plan;
- The signposting/provision of relevant evidence and guidance held or produced by NNDC; and
- Comments relating to any draft review of NP revised chapters/policies on reasonable and timely request in line with the HTC Project Plan – subject to internal work priorities and staff resource (see below)
- It is acknowledged that the TC reserve the right to progress the content of the plan in any event.

### **Section 3 - HTC commitment to engage with its community**

3.0 HTC undertakes, as always, to use a wide range of engagement and communications channels and techniques to listen to and hear from all sections of the community throughout the neighbourhood planning process.

3.1 HTC will produce an ongoing and updated project plan for the production of the NP, with timescales, which will form the basis of its consultation with its community and with NNDC.

3.2 “The HTC monthly meetings are held regularly. The Neighbourhood Plan shall be a frequent item on the agenda. The meetings are well-advertised and take Public questions, verbally, or in writing prior to the meeting, and are always open to the Community. The Finishing Group shall present a Neighbourhood Plan update, whenever on the agenda, and

issue relevant articles as necessary throughout the year. NNDC have a full list of HTC meetings and can, therefore, plan forward so that they can attend when appropriate.”

#### **General Provisions**

4.0 Nothing in this memorandum shall fetter either party in exercising their statutory duties and powers. Nor does it prevent either party from exceeding the minimum level of service stated, either voluntarily or by the specific agreement of both parties.





Stages:

A: Review Tasks

*Agree Memorandum of Understanding with NNDC*

Purpose: to ensure clear and timely collaboration/communication with NNDC and vice versa

Responsible person/group: .....

Task:

- To complete an agreed MoU

Output:

- An agreed MoU.

Time frame:

- 10 days

Useful References:

- Draft MoU
- <https://neighbourhoodplanning.org/toolkits-and-guidance/developing-memorandum-understanding/>

*Review current HNP against Health Check Facilitation Report and current circumstances*

Purpose: to identify the specific parts of the current HNP that require updating.

Responsible person/group: .....

Task:

- read the HNP against the HC report;
- By chapter, identify areas within the HNP that require updating and alteration.

Output:

- A written note detailing pages, paragraphs, maps, figures and general content that require alteration.

Time frame:

- 10 days

Useful References:

- Facilitation Report with Health Check
- [National Planning Policy Framework](#)
- [Planning Practice Guidance](#)
- [North Norfolk District Council - policy](#)

*Scope Additional Matters for Inclusion*

Purpose: to identify which additional matters/issues could be included within the HNP

Responsible person/group: .....

Task:

- To identify if any additional matters/issues should be included within the HNP; if so, to identify which ones;
- To assess whether the additional matters/issues can be practically achieved in a reasonable time frame and with available resources (personnel, expertise, funding) including community engagement where necessary.

Output:

- A summary report/note of how the scoping was undertaken, what it included and what actions are recommended.

Time Frame:

- 10 days

Useful References:

- [North Norfolk District Council - policy](#)



## *Review and Update Policies*

Purpose: to review and update each existing policy of the HNP and ensure it meets the requirements for a justified and effective planning policy and had due regard to national policy and is not contrary to the strategic policies of the development plan.

Responsible person/group: .....

### Task:

- To update, where necessary, each policy of the HNP
- To ensure each policy is supported by appropriate evidence.
- To update the supporting text of each policy chapter to ensure it cogently explains the rationale for the policies which follow.
- Coordinated liaison with NNDC to discuss policy amendments (by chapter) and their relationship with the emerging/extant Local Plan

### Output:

- A written document containing necessary policy amendments and supporting text updates.
- One document per Policy Chapter/Theme.

### Time Frame:

- 28 days

### Useful References:

- Facilitation Report with Health Check
- [National Planning Policy Framework](#)
- [Planning Practice Guidance](#)
- [North Norfolk District Council - policy](#)

*Review the existing Evidence base (and compile evidence list)*

Purpose: to demonstrate that the HNP (to date) has been based on sufficient and adequate evidence.

Responsible person/group: .....

Task:

- to compile a list of all relevant evidence sources used in the compilation of the HNP to date.

Output:

- A list of evidence, with links to where each can be found (this can be included into the Basic Conditions Statement in due course).

Time Frame:

- 14 days

References:

- [NPPF](#)
- [North Norfolk District Council – policy](#)
- [Holt Town Council NP website](#)

**MILESTONE:**

Complete the review stage.

TC to consider the outcomes and the extent of further updates to the HNP necessitated. This will enable determination of the next steps, including the need for any additional evidence to support the plan and any additional consultation/engagement with stakeholders. Liaison with NNDC at this point recommended leading to the production of a draft Statement of Common Ground.

## B: Update Tasks

### *Amend/Rewrite the HNP.*

Purpose: to produce a pre-submission version of the HNP that is up to date, meets the Basic Conditions and is clear/justified/effective.

Responsible person/group: .....

#### Task:

- To update the HNP to reflect the passage of time since 2019.
- To include necessary amendments to policies, supporting text and evidence;
- To incorporate new matters/issues where appropriate but only where supported by suitable evidence and allowing for community engagement;
- To assess whether the additional matters/issues can be practically included in a reasonable time frame and with available resources (personnel, expertise, funding).

#### Output:

- A fully revised draft of the HNP. Two versions should be drafted:
  - i) a track changed version if possible to enable ease of comparison between the previous HNP and its successor;
  - ii) a 'clean' new version.

#### Note:

- The extent of the changes to the previous version of the HNP will need to be assessed for a necessity to engage in further consultation with the community and stakeholders.
- The revised HNP can be submitted to NNDC for SEA/HRA Screening. The outcomes of the Screening will need to be assessed for their implications on the need for further updates to the HNP.

#### Time Frame:

- 42 days after receipt of preceding Review Stage

#### Useful References:

- Facilitation Report with Health Check
- [National Planning Policy Framework](#)
- [Planning Practice Guidance](#)
- [North Norfolk District Council - policy](#)
- [Locality – How to create a NP \(roadmap\)](#)
- [Locality – How to write planning policies](#)
- [Locality – various toolkits and advice](#)

### *Basic Conditions Statement*

Purpose: to complete a Basic Conditions Statement which adequately demonstrates how the HNP has been produced to meet the applicable Basic Conditions for a NP.

Responsible person/group: .....

Task:

- To finalise a Basic Conditions Statement which clearly shows how the revised HNP, allowing for the passage of time and addressing the hiatus since 2019, meets the Basic Conditions applicable to any NP.

Output:

- A Basic Conditions Statement.

Time Frame:

- 42 days after receipt of preceding Review Stage

Useful References:

- Facilitation Report with Health Check
- [National Planning Policy Framework](#)
- [Planning Practice Guidance](#)
- [North Norfolk District Council - policy](#)
- [Locality – General conformity with strategic local planning policy](#)

## Consultation Statement

Purpose: to complete a Consultation Statement which adequately demonstrates how the HNP has been produced to satisfy the requirements applicable to community engagement in the production of a NP.

Responsible person/group: .....

Task:

- To finalise a Consultation Statement which clearly shows how the revised HNP, allowing for the passage of time and addressing the hiatus since 2019, meets the consultation requirements applicable to any NP.

Output:

- A Consultation Statement.

Time Frame:

- 42 days after receipt of preceding Review Stage

Useful References:

- Facilitation Report with Health Check
- [National Planning Policy Framework](#)
- [Planning Practice Guidance](#)
- [North Norfolk District Council - policy](#)
- [Locality – Engaging with your community](#)
- [Locality – consult with environment statutory consultees](#)

### **MILESTONE:**

The Update Stage will be completed following the production of the above documents.

Note: The revised draft plan should be submitted to NNDC for SEA/HRA Screening asap. Upon substantive completion of the draft, a copy should be sent to NNDC and a draft Statement of Common Ground prepared to support the submission version.

The TC must consider the scope and scale of changes to the HNP and implications for consultation. Substantive material changes to the HNP will require further Regulation 14 consultation before formal submission to NNDC.

## C: Submission Task

### *Submit to NNDC*

Purpose: to meet Regulation 15 of the Neighbourhood Planning Regulations (2012) and to enable the HNP to proceed for Examination.

Responsible person/group: .....

#### Task:

- To finalise the HNP, the Basic Conditions Statement and the Consultation Statement and submit to NNDC.

#### Output:

- A successful submission accepted by NNDC.

#### Time Frame:

- As soon as practical following Town Council resolution (as necessary) for the submission of the HNP documents.

#### Useful References:

- Facilitation Report with Health Check
- [National Planning Policy Framework](#)
- [Planning Practice Guidance](#)
- [North Norfolk District Council - policy](#)

**MILESTONE** successful submission date