

Examination Library Document Reference A5.8

(Appendix H to Consultation Statement - Examination Library Document Reference A5)

Proposed Submission Version Local Plan

Regulation 19 Publication Stage

Schedule of Representations

A complete schedule of all responses to the Regulation 19 Stage public consultation received 17 January to 7 March 2022, presented in Local Plan section order.

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Proposed Submission Version Local Plan: Regulation 19 Publication Stage

Schedule of Representations

Introduction

This document sets out the representations *as made* by respondents during the statutory Regulation 19 consultation on the Proposed Submission Version Local Plan and supporting documents, which took place between 17 January and 17 March 2022.

In total 697 representations were received from 190 respondents.

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

Prescribed Consultation Response Form

The consultation response form prescribed key questions seeking specific views in relation to soundness and legal compliance. This followed national practice guidance and was necessary in order to encourage and enable feedback of the relevant information required by the inspector for when the Plan is submitted for examination. The response form sought the completion of a separate response form for each issue (e.g. policy or proposed site) within the Plan. Guidance was provided in order to assist those wishing to respond.

A proportion of the responses received were not made using the prescribed consultation response form. Many of these responses related to multiple topic areas, policies or sites in the Plan, or to other supporting documents. In order to prepare this report, the Council undertook an exercise to split such comments and append them to the relevant section of the document.

In the review and consideration of the representations it may be necessary to separate out other responses if they clearly relate to multiple topic areas, policies or sites in the Plan, in order that further reports can be produced which are helpful and efficient to the process and subsequent examination. As such, this report has been prepared as a draft document.

Blank Fields

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

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

Responses were able to be registered against the sections and policies of the document. The absence of a comment against a section or policy of the Proposed Submission Version Local Plan means that no comments were registered against those parts of the document.

Attachments

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

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

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

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

Local Plan Representations (Regulation 19)

SECTION ORDER

1 Introduction

Consultation Point Title	Introduction
Consultation Point Number	1
Section of the Plan	1.3.1
ID	LPS246
Response Date	24/02/2022 16:28:43
Name	Innova Property Ltd
Organisation	Innova Property Ltd
Agent Name	Julia Edwards
Agent Organisation	Corylus
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified; It is not consistent with national policy
Explanation	SEE ATTACHED FILE
Modifications requested	SEE ATTACHED FILE
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To facilitate the Local Plan process
Attachment(s)	2022 02 23 INNOVA Response v3 SA.pdf
Consultation Point Title	Introduction
Consultation Point Number	1
Section of the Plan	1.0.1
ID	LPS373
Response Date	07/03/2022 10:57:06
Name	
Organisation	D L Ritchie Will Trust
Agent Name	David Jones
Agent Organisation	Armstrong Rigg Planning
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy

* **It is not consistent with national policy**

Explanation

SEE ATTACHED FILE

On behalf of our client, the D L Ritchie Will Trust (the 'Trust'), we wish to make representations to the North Norfolk Local Plan Proposed Submission Version (Regulation 19 Publication Stage). The Trust's representations are enclosed with this letter and have also been submitted using the Council's online consultation portal. These representations focus on the soundness of the plan with respect to whether it is positively prepared, justified, effective and consistent with National Policy.

The trustees of the D L Ritchie Will Trust are local residents in Ludham operating a family farm at Ludham Hall and several residential and holiday lets in the village. The trustees are committed to the sustainable development of the village and are pleased to promote their land to meet the development needs of the village.

We set out the Trust's representations to specific parts of the plan in the following enclosures:

Enclosure 1. Plan Period

Enclosure 2. Spatial Vision

Enclosure 3. Policy SS1 – Spatial Strategy

Enclosure 4. Policy HOU1 – Delivering Sufficient Homes

Enclosure 5. Policy HOU2 – Delivering the Right Mix of Homes

Enclosure 6. Policy HOU3 – Affordable Homes in the Countryside (Rural Exceptions Housing)

Enclosure 7. Policy NW62A – Land West of North Walsham

Enclosure 8. Strategy for Ludham, including: Policy LUD06/A and LUD01/A

In summary, the Trust has significant concerns regarding the soundness of the Local Plan, both with respect to its strategic policies and site specific allocations. The most notable of these concerns are that:

- the proposed plan period will not look ahead over a minimum of 15 years from adoption contrary to national policy;
- the proposed housing requirement departs from the standard method, but then doesn't use the latest 2018-based projections in its revised calculation;
- the Council has failed to update its HELAA since 2017 and it is therefore highly likely that sustainable options for development (including our client's land in Ludham) submitted after this date have not been given due consideration in the development of the plan;
- the forecast delivery from land west of North Walsham is highly unrealistic and leads to an overly optimistic supply forecast for the plan period; and
- the Council are unable to demonstrate a 5 year supply of housing and will be unable to do so on adoption of the Local Plan.

These five issues are so significant (resulting in a need to allocate several thousand more homes than currently identified) that they shouldn't be left to be resolved as part of main modifications to the plan during examination. We therefore recommend that the Council take a step back to resolve these issues before undertaking a further Regulation 19 consultation.

We also have significant concerns regarding the low level of development proposed to be allocated to the Large Growth Villages and to Ludham in particular, where existing allocations have simply been rolled over with little consideration of their deliverability or the number of dwellings likely to be achieved on each site. Ludham is allocated just 35 homes, but the proposed allocations will only deliver 12. There is therefore a significant need for additional sites to be allocated in the village. In this context we are pleased to set out the strong case for extending site allocation Policy LUD01/A to include adjoining land that is in our client's ownership and for allocating land at Catfield Road, Ludham (Refs: H0904 and LUD02) which is assessed positively in the HELAA.

We trust that these comments will be given the due consideration and we would welcome the opportunity to discuss the issues raised with officers.

Modifications requested

SEE ATTACHED FILE

The issues raised in our representations to various policies in the plan are significant (resulting in a need to allocate several thousand more

	homes than currently identified) that they shouldn't be left to be resolved as part of main modifications to the plan during examination. We therefore recommend that the Council take a step back to resolve these issues before undertaking a further Regulation 19 consultation.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To participate in debate
Attachment(s)	L0002 - North Norfolk Local Plan Reg 19 Repls.pdf
Consultation Point Title	Introduction
Consultation Point Number	1
Section of the Plan	General Comments
ID	LPS778
Response Date	07/03/2022 17:54:00
Name	Mr Paul Harris
Organisation	South Norfolk Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	South Norfolk Council welcomes North Norfolk's continued involvement in the joint working that is taking place between Officers and elected Members across Norfolk as part of the Norfolk Strategic Framework, and the 25 endorsed agreements that are contained within it. In particular, South Norfolk Council welcomes the local plan's commitment to meeting North Norfolk's locally assessed housing need in full in accordance with agreement 11 of the Norfolk Strategic Framework. South Norfolk Council looks forward to continuing to work with North Norfolk District Council to realise the vision for Norfolk set out in the Norfolk Strategic Framework.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Introduction
Consultation Point Number	1
Section of the Plan	General comment
ID	LPS349
Response Date	04/03/2022 14:45:17
Name	Miss Natalie

	Beal
Organisation	Broads Authority
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	The following comments can be addressed through minor changes to the wording as suggested. Whilst the change is minor, it is important to the Broads and its setting. Following discussions with officers at NNDC, we understand that the approach at this stage is to acknowledge that some changes are required to the Plan and you intend to propose some changes when you submit the plan, and that they will produce a Statement of Common Ground with parties like ourselves which will include their proposed approach to our comments. We support this approach and for that reason, have not raised soundness issues at this stage. That being said, depending on their response to the issues raised below about wind turbines, we may need make soundness representations at a later date.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Introduction
Consultation Point Number	1
Section of the Plan	1 Introduction
ID	LPS430
Response Date	07/03/2022 14:31:00
Name	Mrs Sarah Martin
Organisation	Ashmanhaugh Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	

Explanation	<p>It is felt that there is not enough assurance provided in the Local Plan to the many surrounding small communities (of which Ashmanhaugh Parish is just one) that an increase of housing in the large growth town of North Walsham and small growth towns of Hoveton and Stalham will fully address the provision of Health and GP services.</p> <p>At small Parish levels where there in surrounding areas have seen development and growth in recent years there has not been the same level of increase in these services and often there are delayed waiting times for patient appointment. It is felt a Health Impact Assessment should be a key part and included in the plan.</p> <p>The same concerns are had for education as again with the local developments over the recent years there has not been seen an increase in providing additional school provision.</p> <p>One of the main concerns of the Local Plans proposal due to the planned increase in the population of North Walsham and the further developments planned in Hoveton and Stalham is the huge impact on infrastructure for all surrounding communities/Parishes.</p> <p>Increases in traffic on the A1151, B1150, A149 are inevitable. Traffic increases can be anticipated from personal journeys (commuting, leisure) from service industries (supply to and from shops and businesses) and sustainable industrial expansion. Transport between Norwich to North Walsham or Stalham (and beyond) relies heavily on two bridges over the River Bure at Wroxham and Coltishall. Both these bridges are effectively single lane as only one vehicle can pass when an HGV crosses the structure. The bridges can cause significant traffic delays at present and added traffic generated by the Local Plan cannot just be absorbed by the public. Although these bridges may fall outside or on the border with Broadland District it is felt that a strategic plan to improve both or at least one of the bridges should be considered as part of the Local Plan.</p> <p>There are also concerns with the North Walsham planned development and the supply of water.</p> <p>Concerns also in regard to high quality agricultural land being lost to new homes especially in Hoveton and North Walsham. Land is a very precious resource with concern on levels of food production surely it would be prudent to protect high quality land for farming and concentrate on brown field sites and poorer areas of productive land.</p> <p>It is not fully understandable how the plan allows for the population growth figure in relation to the number of houses proposed across North Norfolk.</p> <p>Although the plan does not have any allocated housing planned for the Parish of Ashmanhaugh (which falls into a Countryside Policy Area) the plan should include an assessment of how growth of each individual location affects another. This does not seem to be evident at present.</p>
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Introduction
Consultation Point Number	1
Section of the Plan	1 Introduction
ID	LPS765
Response Date	28/02/2022 16:35:00
Name	Mr Mark Behrendt
Organisation	Home Builders Federation
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	

Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not consistent with national policy
Explanation	The plan is unsound as the plan period is inconsistent with national policy. Paragraph 22 of the NPPF states that strategic policies in local plans should look "... ahead for a minimum of 15 years from adoption", with the exception of policies relating to town centre development. However, given that the submission of this local plan is unlikely to be before the summer of 2022 it is unlikely that the plan will be adopted until 2023/24 at the earliest.
Modifications requested	At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF for the following reasons: • The plan period is inconsistent with national policy In order to have a local plan that has a minimum of 15 full years after adoption the Council must extend the plan period to 2038/39 and ensure that there is sufficient development to meet assessed needs over this period.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	I can also confirm that I wish to participate in the relevant hearing sessions in order to full represent our concerns which reflect the views of discussions with our membership who account of 80% of the market housing built in England and Wales.
Attachment(s)	
Consultation Point Title	Introduction
Consultation Point Number	1
Section of the Plan	Various
ID	LPS84
Response Date	15/02/2022 13:22:00
Name	Ms Elaine Pugh
Organisation	Southrepps Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	No
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	SEE ATTACHED FILES

Modifications requested	SEE ATTACHED FILES
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	SOUTHREPPS-LOCAL PLAN 2022.pdf SOUTHREPPS-LOCAL PLAN - 13TH June 2019.pdf
Consultation Point Title	Introduction
Consultation Point Number	1
Section of the Plan	Whole document
ID	LPS290
Response Date	03/03/2022 11:48:00
Name	Ms Tina Foster
Organisation	North Walsham Town Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	North Walsham Town Council have reviewed the consultation documents and are satisfied that this reflects the issues and concerns that we previously raised during the process.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Introduction
Consultation Point Number	1
Section of the Plan	Whole document
ID	LPS548
Response Date	07/03/2022 16:25:00
Name	Ms Dee Holroyd
Organisation	Paston Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes

Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Paston Parish Council would like to support NNDC's Local Plan with particular reference to support of affordable housing and of not having second homes in the area.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Introduction
Consultation Point Number	1
Section of the Plan	Whole document
ID	LPS549
Response Date	07/03/2022 16:02:00
Name	Ms Dee Holroyd
Organisation	Knapton Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Knapton Parish Council would like to record their support of the NNDC Local Plan with particular reference to support of Affordable Housing and not allowing second home ownership.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

1.3 Sustainability Appraisal (SA)

Consultation Point Title	Sustainability Appraisal (SA)
Consultation Point Number	1.3
Section of the Plan	1.3 Sustainability Appraisal (SA)
ID	LPS276
Response Date	28/02/2022 21:28:16
Name	Mr Benjamin Bethell
Organisation	Hoveton Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	No
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified; It is not consistent with national policy
Explanation	<p>Sustainability Appraisal Report</p> <p>The Sustainability Appraisal Report (page 268) is not satisfactory in the following respects:</p> <p>The report concludes that the biodiversity impact is uncertain for Hoveton. The SAR has not adequately addressed the Aichi Targets included in the "Strategic Plan for Biodiversity 2011-2020" which the UK signed up to in Japan in October 2010. Of the 20 targets which were supposed to have been addressed by 2020, the current version of the Local Plan fails to address 8, or 40% of them.</p> <p>The "Biodiversity 2020: A strategy for England's wildlife and ecosystem services" document produced by DEFRA includes a foreword by The Rt Hon. Caroline Spelman MP, Secretary of State for Environment, Food and Rural Affairs in which she states "<i>our ambition is to move progressively from a position of net biodiversity loss to net gain</i>". Clearly, when the impact is assessed as 'uncertain', it is probably not achieving a "net gain".</p> <p>Of particular concern, the proposed site allocation for Hoveton both loses high quality agricultural land and harms the landscape. The green space allocated in Hoveton is used by 2 species of Bat, 2 species of Deer, Hare, Fox, 22 species of birds and butterflies – an analysis of protected/ unprotected species at this location is available on request.</p>
Modifications requested	Remove policy and allocation HV01/B
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To ensure that the local plan is sound.
Attachment(s)	
Consultation Point Title	Sustainability Appraisal (SA)
Consultation Point Number	1.3
Section of the Plan	1.3 Sustainability Appraisal (SA)
ID	LPS802
Response Date	28/02/2022 14:38:00

Name	Mr Darl Sweetland
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>CLARIFICATION: The 'serious water stress' reference (4.17) should be updated in liaison with the Environment Agency (www.gov.uk/government/publications/water-stressed-areas-2021-classification). The continued designation from 2013 onwards of the Anglian region as an area of serious water stress supports the Council's requirement that developers should enable 100% of new homes in North Norfolk to achieve and deliver a water efficiency level of 110 l/p/p/d or better. As set out above Anglian Water support Policy CC4 and request that the policy is clarified to show ongoing responsibility for achieving the target or better. This may include higher levels of water efficiency being required moving towards an 85 l/p/p/d target ahead of tighter Regulations being brought in nationally as part of resource and climate change/ net zero measures.</p> <p>CLARIFICATION: The Water Resource Management Plan references (4.19 and 4.20) should be updated to include the WRE Regional Plan (see above) and the 2020-2045 WRMP (www.anglianwater.co.uk/about-us/our-strategies-and-plans/water-resources-management-plan) and the emerging WRMP which will be consulted on in 2022. The plans will set out how Anglian Water is reducing sourcing water from abstraction through sustainability reductions and increasing the supply of water from strategic reservoirs and pipelines. Anglian Water's net zero by 2030 target will support the delivery of these strategic solutions including through renewable energy generation at our facilities. Anglian Water would welcome the Council responding to and supporting these plans which look to support customers to reduce the demand for water as well as investing in new supplies for the Anglian region to adapt to climate change.</p> <p>CLARIFICATION: For Anglian Water's investment plans (4.20) and the implications see the location specific comments above.</p> <p>NOTE: On the question of diffuse source contamination from agriculture (4.31) this will be a matter that Natural England will be considering in taking forward their approach to Nutrient Neutrality (see comments above particularly regarding European level designated sites)</p> <p>NOTE: Anglian Water continues to work with the Council (SA3, page 146) to support the Plan's production and the delivery of sustainable growth. The evolving position on water supply and wastewater recycling coupled with climate change adaptation requires that Anglian Water place increasing emphasis on the carbon implications of the Plan allocations and policy. The investment to support growth, given the approach taken by regulators is a 'chicken and egg' position.</p> <p>Investment to enable the sustainable supply of water, the management of wastewater and to address surface water flooding is dependent on sites being identified in Local Plans with trajectories for their delivery. The timing of the Plan will likely require Anglian Water to adjust investment plans approved by regulators. Investment at specific locations will then be ultimately determined by sites coming forward in discussion through pre application and then determination. It is understood that the tens of pounds cost per home for water efficiency measures is supported by developers in North Norfolk who consider it does not affect viability and is a selling point for increasingly environmentally conscious house buyers.</p>

CLARIFICATION: Anglian Water is measuring the carbon impacts of investment and project options to reduce the embodied/ capital and operational carbon of the infrastructure and services we provide to customers. Although an emerging issue only recently considered by the Environmental Audit Committee (<https://committees.parliament.uk/oralevidence/2865/html>) it is perhaps an omission in the Plan that these aspects of spatial decision making and site- specific policy are not more evident in the Plan and supporting documents including the SA. This may perhaps be a result of the Plan's long period of development as well as the standard SA qualitative process that no quantification has been provided on the options considered and how developments will be assessed quantitatively to show how and when they will be contributing to delivering North Norfolk's share of climate change reductions. Paragraph 2.2.7 of the Plan indicates that this required reduction is circa 13.4% per year.

Given that the Plan is:

- planning development for the next ten years that will have embodied carbon and operational emissions for the next 50 years or more, and
- growth of the housing stock is circa 0.6% per year

the contribution from new development and the infrastructure (existing, expanded, and new) perhaps should perhaps by future proofing a step change in emissions. This in part reflects the costs, including on more vulnerable and lower income residents, of retrofitting measures – although this is not considered in the SA. This may be a matter on which the Council wants to update Policy SS1 and link it to Policy CC3, potentially to provide a basis for the development of an SPD considering the spatial carbon (embodied & operational) impacts of growth and seeking quantitative assessment by site promoters and applicants. For its part Anglian Water can provide data and assessment inputs to inform decisions so they support the sustainability hierarchy and the Plans vision of 'climate resilient sustainable development'.

Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Sustainability Appraisal (SA)
Consultation Point Number	1.3
Section of the Plan	1.3 Sustainability Appraisal (SA)
ID	LPS763
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	

Explanation	We are generally satisfied that the methodology and baseline information used to inform the scoping report appears to meet the requirements of the SEA Directive [2001/42/EC] and associated guidance. Our advice is that further updates to the SA should ensure a robust assessment of the environmental effects of Plan policies and allocations on statutorily designated sites and landscapes including, taking into consideration our advice above. The SA will need to identify appropriate mitigation to address any adverse impacts to designated sites and landscapes and other aspects of the natural environment including water and BMV land.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Sustainability Appraisal (SA)
Consultation Point Number	1.3
Section of the Plan	Sustainability Appraisal, p268
ID	LPS267
Response Date	28/02/2022 13:18:09
Name	Mr Geoff Cook
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not consistent with national policy
Explanation	SEE ATTACHED FILES 1 The Sustainability Appraisal Report (page 268) is not positive for 25% of the objectives. 1 Specifically, the allocation states that the biodiversity impact is uncertain. This is not consistent with national policy as it has not addressed the Aichi Targets included in the "Strategic Plan for Biodiversity 2011-2020" which the UK signed up to in Japan in October 2010. Of the 20 targets which were supposed to be complete by 2020 the Local Plan fails to address 8, or 40% of them. 2 "Biodiversity 2020: A strategy for England's wildlife and ecosystem services" produced by DEFRA includes a foreward by The Rt Hon. Caroline Spelman MP, Secretary of State for Environment, Food and Rural Affairs and states "... our ambition is to move progressively from a position of net biodiversity loss to net gain..." Clearly, when the impact is uncertain it is not a "net gain". 3 In addition, the allocation loses agricultural land and does not enhance the landscape. It is used by 2 species of Bat, 2 species of Deer, Hare, Fox, 22 species of birds and butterflies.
Modifications requested	

Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	Biodiversity 2020_ A strategy for England's wildlife and ecosystem services.pdf HPC Wildlife Analysis.pdf

1.4 Habitat Regulations Assessment (HRA)

Consultation Point Title	Habitat Regulations Assessment (HRA)
Consultation Point Number	1.4
Section of the Plan	1.4 Habitat Regulations Assessment (HRA)
ID	LPS277
Response Date	28/02/2022 21:31:36
Name	Mr Benjamin Bethell
Organisation	Hoveton Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	No
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified; It is not consistent with national policy
Explanation	<p>Habitat Regulation Assessment</p> <p>The Habitat Regulation Assessment (HRA), produced by Footprint Ecology for NNDC, assesses the impact of the Local Plan on sites for biodiversity. However, this contains errors for the allocated land in Hoveton and therefore cannot be considered “sound” in that:</p> <ol style="list-style-type: none"> 1 Table 3 on page 60 shows the number of houses within the “relevant zones of influence”. This table shows 120 houses for the development site – this therefore ignores the large number of dwellings being proposed for the elderly, of ‘at least’ 60 units. 2 The HRA proposal for Hoveton has also ignores the existence of local developments currently being built at Church Farm and also at Tilia Park, the latter also off the Tunstead Road. 3 The report highlights recreational and hydrological risks as a consequence of the proposed Hoveton allocation, but the impact would actually be much greater as the number of units is much greater than 120, in fact being ‘at least’ 60 units more! 4 The report identifies Hoveton as a small town, rather than a village, which is incorrect as a classification 5 The report contains inconsistent distances to the Broads 6 The report chooses to separate Wroxham and Hoveton rather than join them for consideration of habitat aspects, which the HRA process has done for the other areas for development covered in the Local Plan. 7 The significant Air Quality issues on the A1151 either side of the Wroxham Bridge, where traffic is usually stationary, have not been mentioned at all, although air quality is being considered for other areas in the Local Plan, where this issue is going to be of lesser significance. <p>Water Recycling Centre capacity issues have been mentioned, but the comments about these simply needing to be resolved before any development takes place greatly underplay the immense problems with infrastructure locally, and do really need to be better sign posted for Hoveton.</p>
Modifications requested	Remove allocation and policy HV01/B from the Local Plan
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To ensure the Local Plan is sound.

Attachment(s)	
Consultation Point Title	Habitat Regulations Assessment (HRA)
Consultation Point Number	1.4
Section of the Plan	1.4 Habitat Regulations Assessment (HRA)
ID	LPS801
Response Date	28/02/2022 14:38:00
Name	Mr Darl Sweetland
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>NOTE: The Water supply baseline (6.5) should be updated to include reference to the 2022 Water Resources East Regional Plan (https://wre.org.uk/wp-content/uploads/2022/01/WRE-Emerging-Plan.pdf). For example, the need to reduce demand from new and existing homes for water is based on forecast water deficit in Eastern England by 2050 of between 703 million litres a day (or megalitres – Ml/d) and 2,267 Ml/d. This baseline for planning reduction demand and new supply is caused by population growth, climate change and the need to restore, protect and enhance our natural environment.</p> <p>CLARIFICATION: Anglian Water has made the decision to consult on a Statement of Facts on the Horning WRC (6.8). The Plan and planning applications decisions based on it are matters for the Council in consultation with the Environment Agency. Anglian Water will continue through advice on planning applications above 10 homes in the area to work with developers, the Council and other agencies to advice on the consequences of the development and the ability or no for further mitigation measures to address flooding, the movement of sewer pipes due to soil expansion and contraction and the ingress of water from the river to the wastewater system. In line with our assessment on the availability of capacity at other WRC, Anglian Water agree with the Council that growth in Small Villages under Policy SS1 can be delivered through development in more sustainable locations.</p> <p>NOTE: Anglian Water continues to undertake measures and support work by partners to address in Hoveton and which then feed into the WRC. Given the allocation of 120 homes at Hoveton (6.9 and Policy DS1), the operation of the policy requiring developers to support applications with evidence demonstrating no adverse impact on the European level designated sites will need further work with Natural England and the Environment Agency to provide options for developers which potentially provide meaningful reductions in nutrients from point sources and dispersed sources in the river Bure catchment.</p> <p>NOTE: Anglian Water will confirm the investment at Ludham (6.10 of HRA) as part of the emerging Drainage and Wastewater Management Plan (DWMP) and the Price Review (PR24) process. It is not clear from Policies LUD01/A and LUD06/A (rather than HV01/B referred to in 6.10 of the HRA) or 20.1.3 how the total allocation of 35 homes at Ludham would be delivered (6.11). Early and detailed pre application advice should be sought from Anglian Water (www.anglianwater.co.uk/developing/planning-capacity/planning-and-capacity).</p> <p>Given the planned development of site LUD01/A (23.0.12) in 2024 and 2025 it may be that the Council will need to bring forward other more sustainable sites if the applicant would be unable to demonstrate</p>

to the Environment Agency and/ or Natural England that the scheme complies with parts 7, 8 and 9 of Policy LUD01/A. Measures required to be undertaken by Anglian Water would need to be set out in the DWMP and funded under covering the 2025 to 2030 or a later date if the trajectory is altered in 23.0.12. The DWMP will be subject to subject to consultation over the next 18 months and finalised in 2023 ahead of agreement with regulators on investment in late 2023/ early 2024.

NOTE: Anglian Water notes (6.11) the position on the Stalham allocations (ST23/2 and ST19/A) for 150 homes. It is recommended that the Council and the site promoters confirm the position on these sites and the approach to the European level sites.

CLARIFICATION: The planned investment by Anglian Water at Fakenham (6.12) to provide for the level of growth in the Plan is dependent on the DWMP for 2025 to 2030 and beyond being confirmed by regulators through the Price Review (PR24) process. Plans at Examination by the end of 2022 will be considered in PR24. The current headroom at the Fakenham WRC would without that investment provide for four years of growth. Based on the solely on trajectory at 23.0.02 and the four allocations that headroom without investment would be used up by 2030. That trajectory though excludes existing development sites and windfalls. If through the planning application process including appeals sites come forward more rapidly, they be picked up through Anglian Water's annual review. This may enable investment to be brought forward earlier although that would be at the expense of investment elsewhere. Anglian Water notes that the major development sites at Fakenham have stalled in pre application and so that may continue providing further time for investment and reprioritisation of investment elsewhere.

NOTE: Anglian Water notes the position on the Fakenham (7.7) and Holt (7.8) allocations. It is recommended that the Council and the site promoters confirm the position on these sites and the approach to the European level sites. Given the headroom restrictions at these settlements a more sustainable approach may be to bring forward less constrained sites in the Plan so that solutions including addressing dispersed nutrient sources can be brought forward. This may then enable the Fakenham and Holt sites to come forward – following advice from Natural England and the Environment Agency - later in the Plan period.

Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Habitat Regulations Assessment (HRA)
Consultation Point Number	1.4
Section of the Plan	1.4 Habitat Regulations Assessment (HRA)
ID	LPS762
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound	

<ul style="list-style-type: none"> * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy 	
Explanation	<p>Natural England is satisfied that the Habitats Regulations Assessment (HRA) (Footprint Ecology, 9th December 2021) has provided a robust assessment of the Regulation 19 stage of North Norfolk District Councils Draft Local Plan in accordance with the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended) and having regard to relevant case law.</p> <p>Natural England agrees with the conclusions made in the HRA and supports the mitigation measures suggested. Although, GIRAMS is considered to be the main mitigation measure for recreational disturbance, we would also like to draw your attention to site specific green infrastructure that may also reduce any likely significant effects from development proposals, as detailed in Policy CC11 of the Local Plan.</p>
Modifications requested	
Appear at examination hearing session(s)? <ul style="list-style-type: none"> * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s) 	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Habitat Regulations Assessment (HRA)
Consultation Point Number	1.4
Section of the Plan	Habitat Regulations Assessment, Page 60, Table 3
ID	LPS268
Response Date	28/02/2022 13:18:34
Name	Mr Geoff Cook
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? <ul style="list-style-type: none"> * Yes * No 	
Has the duty to cooperate been met? <ul style="list-style-type: none"> * Yes * No 	
Do you consider the plan to be Sound? <ul style="list-style-type: none"> * Yes * No 	No
Reason(s) not Sound <ul style="list-style-type: none"> * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy 	It is not positively prepared
Explanation	<ol style="list-style-type: none"> 1 The Habitat Regulation Assessment (HRA) is a comprehensive and technical report produced by Footprint Ecology based in Dorset for NNDC. It assesses the impact of the Local Plan on the internationally important sites for biodiversity. However, it contains errors for the allocated land and therefore cannot be considered "sound" <ol style="list-style-type: none"> 1 Table 3 on page 60 shows the approximate number of houses within the "relevant zones of influence". The table shows 120 houses and therefore ignores the number of dwellings included in the care home. It also ignores the developments at Church Farm and off Tunstead Road. 2 The report also highlights recreation and hydrological risks as a consequence of the allocation, but the impact would be greater if the number of houses is greater than 120. 3 The report classifies Hoveton as a small town, rather than a village

	<p>4 The report contains inconsistent distances to the Broads</p> <p>5 The report chooses to separate Wroxham and Hoveton rather than join them for habitat reasons as it has for other areas covered in the report.</p> <p>6 The Air Quality issues on the A1151 at Wroxham Bridge have not been included although air quality is addressed for other areas in the report. There was a "single peak" of Nitrogen Oxide in 2017 in Hoveton before NDR was completed.</p>
Modifications requested	
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

1.5 The Duty to Cooperate

Consultation Point Title	The Duty to Cooperate
Consultation Point Number	1.5
Section of the Plan	1.5 The Duty to Cooperate
ID	LPS18
Response Date	18/01/2022 11:19:36
Name	Mr Peter Jermamy
Organisation	Borough Council of Kings Lynn & West Norfolk
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	We continue to work closely with North Norfolk District Council (NNDC) on the delivery of the Green Infrastructure and Recreational impact Avoidance and Mitigation Strategy (GIRAMS) and on the Norfolk Coastal Partnership and will continue to cooperate through the Norfolk Strategic Planning Group (NSPG). We are satisfied that NNDC and the Borough Council are fulfilling the Duty to Cooperate.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	The Duty to Cooperate
Consultation Point Number	1.5
Section of the Plan	1.5 The Duty to Cooperate
ID	LPS278
Response Date	28/02/2022 21:40:51
Name	Mr Benjamin Bethell
Organisation	Hoveton Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	No
Do you consider the plan to be Sound?	No

* Yes	
* No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	It is not clear that there is a coordinated approach to transport across neighbouring districts, for example the impact of plans for North Norfolk and the impact on the area covered by the Greater Norwich Local Plan (GNLP). For example, the impact on 'pinch points' like Hoveton/Wroxham (Stalham) or Coltishall/Horstead (North Walsham).
Modifications requested	The allocation HV01/B should be removed.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To ensure the Local plan is compliant.
Attachment(s)	
Consultation Point Title	The Duty to Cooperate
Consultation Point Number	1.5
Section of the Plan	1.5 The Duty to Cooperate
ID	LPS718
Response Date	28/02/2022 08:14:00
Name	Mrs Debbie Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Should Historic England also be mentioned here under duty to co-operate? We would welcome the preparation of a Statement of Common Ground with Historic England in due course.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

1.6 Viability Considerations

Consultation Point Title	Viability Considerations
Consultation Point Number	1.6
Section of the Plan	1.6.1 - 1.6.2
ID	LPS411
Response Date	07/03/2022 12:49:01
Name	Mr Will Wright
Organisation	ESCO Developments, Flagship Housing Group & Lovell Partnerships
Agent Name	Sarah Hornbrook
Agent Organisation	Bidwells LLP
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	The Viability Assessment which underpins the Draft Local Plan has not assessed any development typologies in excess of 200 units, and was undertaken in 2017/18. In order to ensure that the assumptions underpinning the allocation of sites are robust and evidence-based, and that the Plan is therefore sound, it is considered that further work should be undertaken in advance of Submission of the Draft Plan to update the Viability Assessment and to introduce additional typologies relevant to larger strategic sites (or, if considered more appropriate, in accordance with paragraph 10-005-20180724 of the Practice Guide, to undertake site-specific viability assessment of the strategic sites such as NW62/A).
Modifications requested	Further work should be undertaken in advance of Submission of the Draft Plan to update the Viability Assessment and to introduce additional typologies relevant to larger strategic sites (or, if considered more appropriate, in accordance with paragraph 10-005-20180724 of the Practice Guide, to undertake site-specific viability assessment of the strategic sites such as NW62/A)
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	I reserve the right to appear prior to publication of the draft agendas that will set out the Inspector's matters and questions to form the basis of the discussions at the Hearings. The intention to appear is to seek to ensure that the Policy can be made sound.
Attachment(s)	
Consultation Point Title	Viability Considerations
Consultation Point Number	1.6
Section of the Plan	1.6 Viability Considerations
ID	LPS392
Response Date	07/03/2022 18:01:11
Name	
Organisation	Richborough Estates

Agent Name	Mrs Raj Bains
Agent Organisation	Boyer Planning
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	<p>Please refer to full statement of representations (see LPS263) on behalf of our client.</p> <p>The proposed Local Plan Policy NW62/A sets out a mixed-use Sustainable Urban Extension (SUE) amounting to 108 hectares for the allocation of approximately 1,800 dwellings, 7 hectares of employment land, green infrastructure, community facilities and a new road linking Norwich Road, Cromer Road and the industrial estate.</p> <p>The proposed site-specific requirements of the policy include the prior approval and adoption of a comprehensive Development Brief. This is required to incorporate a site wide Vision and Masterplan and a Design Code. The Development Brief is to set out plans for the early delivery of a link road connecting Norwich Road to Cromer Road and a suitable route over the railway for access to Lyngate/Folgate Road industrial estate.</p> <p>Policy HOU 1 of the emerging Local Plan proposes a minimum housing target of 9,600 dwellings over the plan period. Section 23 of the emerging plan proposes a housing trajectory, which we consider provides for an overestimated housing provision during the first 5 years of the plan. A large proportion of this provision is expected to be delivered from the proposed site allocations, particularly Policy NW62/A; however, we are concerned that the evidence does not support that this site will come forward at the projected time and that the Council should consider allocating additional small and medium sites to make the plan resilient to change and fundamentally to ensure the overall housing need is achieved.</p> <p>These representations support development and growth in North Walsham and the recognition within the Local Plan that North Walsham is a relatively unconstrained location for high levels of growth. However, for the reasons set out in our representations it is considered that the emerging Local Plan is not sound. Our client has fundamental concerns with the proposed plan including the deliverability of the proposed SUE, an overestimate of supply within the housing trajectory and the Council's approach towards maintaining an adequate supply of housing over the course of the plan period.</p> <p>It is considered that the emerging plan is not justified as it fails to provide a robust and credible evidence base to support the housing delivery of the proposed site allocations, which could fail to meet local housing needs in the short term period (first 5 years of the plan). The absence of flexibility within the plan to respond to any potential shortfalls in delivery is a key issue. Should the proposed North Walsham SUE fail to come forward during the plan period, or even towards the latter part of the plan period, there is a high risk that the plan would fail to provide the minimum housing requirement.</p>
Modifications requested	To ensure that the proposed policies contained in the Local Plan are deliverable, we strongly suggest further work to support the viability of the proposed Policy NW62/A (SUE) is provided, and that an accurate viability assessment considers the wider infrastructure costs associated with the policy are set out and further determines a sufficient amount of affordable housing.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s)	Yes, I wish to participate in hearing session(s)

* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	Our representations provide fundamental concerns about the proposed policies contained in the Local Plan. It is critical the Inspector hears our views on why we think the Plan is unsound and will fail to meet local housing needs of North Norfolk. Ultimately, our views could help assist the Council in ensuring there is an adequate supply of new housing across the District and throughout the short term, medium and long term period of the Local Plan.
Attachment(s)	

1.7 Supporting Evidence & Background Papers

Consultation Point Title	Supporting Evidence & Background Papers
Consultation Point Number	1.7
Section of the Plan	1.7.1
ID	LPS402
Response Date	07/03/2022 18:28:14
Name	
Organisation	Richborough Estates
Agent Name	Mrs Raj Bains
Agent Organisation	Boyer Planning
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	<p>Please refer to full statement of representations (see LPS263) on behalf of our client.</p> <p>It is considered that the emerging plan is not justified as it fails to provide a robust and credible evidence base to support the housing delivery of the proposed site allocations, which could fail to meet local housing needs in the short term period (first 5 years of the plan).</p> <p>Whilst we support development and growth being allocated to North Walsham, we strongly disagree that the majority of the proposed site allocations are likely to come forward in the first 5 years of the emerging plan, most importantly the proposed SUE (Policy NW62/A Land west of Walsham). There is no robust or sufficient evidence to suggest these are deliverable within the short term period of the plan.</p> <p>We therefore disagree that the plan is sound as the proposed housing trajectory is unjustified. The Council's highest number of completions (546 dpa) were in 2017 and 2018. In 2019/20 there was an under delivery of 61 dwellings and in 2020/21 there were 481 completions, which just reached over the annual requirement, indicating a slower build out rate.</p> <p>Based on the above past delivery rates, it is not clear what evidence the Council has considered to indicate that a significantly higher rate of delivery is likely to be achievable in the District, in comparison to what has been achieved previously. There is no information within the evidence base to suggest the market would be able to sustain a significantly higher rate of delivery. A high delivery rate in two consecutive years (2017/18 and 2018/19) does not provide a robust or credible evidence base to suggest increasing levels of delivery are achievable during the plan period. We consider the proposed Local Plan not justified and therefore contrary to paragraph 35 of the NPPF (2021). In the absence of robust and credible evidence to support the proposed allocation of the SUE, the proposed plan fails demonstrate that the level of growth proposed in the housing trajectory would be deliverable during the plan period.</p> <p>The lack of technical information indicates there is risk to the deliverability of the required infrastructure. As such it is considered that the plan is not justified and therefore fails to meet the test of 'soundness' as set out in paragraph 35 of the NPPF (2021). There is a lack of robust and credible evidence base to support this proposed allocation and this should be reviewed by the Council prior to the submission of the plan for examination.</p>

Modifications requested	<p>In response to paragraph 1.7.1, there is a significant amount of supporting and technical information that is missing to support the deliverability of the proposed Policy NW62/A, which needs to be provided, as we consider this policy will fail to achieve the overall housing need in the District over the short, medium and long term period of the Local Plan.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	<p>Yes, I wish to participate in hearing session(s)</p>
Justification for appearing at hearing	<p>Our representations provide fundamental concerns about the proposed policies contained in the Local Plan. It is critical the Inspector hears our views on why we think the Plan is unsound and will fail to meet local housing needs of North Norfolk. Ultimately, our views could help assist the Council in ensuring there is an adequate supply of new housing across the District and throughout the short term, medium and long term period of the Local Plan.</p>
Attachment(s)	

2 Spatial Portrait, Vision, Aims & Objectives

Consultation Point Title	Spatial Portrait, Vision, Aims & Objectives
Consultation Point Number	2
Section of the Plan	2.0.1
ID	LPS26
Response Date	23/01/2022 15:51:51
Name	Mr David Hurdle
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not consistent with national policy
Explanation	There needs to be more emphasis on increasing the provision of additional public transport. The council must stop introducing free car parking near Christmas as that encourages car use, which is wrong.
Modifications requested	Do not accept that existing public transport is fine. It is not. To encourage more use, more PROVISION is needed, as per the National Bus Strategy. Stop encouraging car use.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Spatial Portrait, Vision, Aims & Objectives
Consultation Point Number	2
Section of the Plan	2.1.26
ID	LPS189
Response Date	23/02/2022 15:33:16
Name	Greg Hewitt
Organisation	Wells Town Council
Agent Name	Andrea Long
Agent Organisation	Compasspoint Planning and Rural Consultants
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes

Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<p>The Local Plan does not adequately deal with the issue of principal residence housing for those communities where there are significant levels of second and holiday home ownership. The Local Plan effectively omits the issue.</p> <p>Using NNDC's own figures from Council Tax in 2020 and 2021 , 1 in 4 homes (25%) in Wells are second homes or holiday homes. Preliminary results from specific localised research being undertaken to support the emerging Neighbourhood Plan is indicating that between 31% and 40% of dwellings are either second homes or holiday homes.</p> <p>The consequent impact on the local housing market and the ability of local people to acquire their own home is overlooked. The restriction to principal residence of new houses for sale was heavily endorsed in the Wells Neighbourhood Plan consultation in October 2021. The issue is barely mentioned in this version of the Local plan (only where buildings lost through coastal erosion are replaced – Policy CC6). Community-led housing developments on the other hand are approved.</p> <p>It would be important to know what the effect would be on house prices in the town, which already far exceed the capacity of local pockets and how it would affect the viability of affordable housing projects. The reference to settlements such as Salthouse, where the percentage of second homes exceeds a third of the stock ignores the similar percentages in Wells which is believed now to be much larger than, Salthouse. The impact of the overall numbers is massive by comparison.</p>
Modifications requested	Para 2.1.26 is an inadequate description of the position which is common across the District and needs a complete rewrite to explore the issue further and take full account of available evidence. The plan is not justified if it either omits or does not take proper account of relevant evidence .
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	Wells Town Council would appreciate the opportunity to make and amplify its points in person.
Attachment(s)	
Consultation Point Title	Spatial Portrait, Vision, Aims & Objectives
Consultation Point Number	2
Section of the Plan	2.1.5 - 2.1.7, 2.1.18, 2.1.19, 2.1.26, 2.1.27, 2.2.11, 2.3.1
ID	LPS121
Response Date	24/02/2022 16:17:32
Name	Mr. John Edwards
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes	No

* No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	The strategic content of the Local Plan is unsound as it does not provide policies to address the special challenges faced by the settlements in and adjoining the Heritage and Undeveloped Coast area in the far west of North Norfolk District. The issues raised are dealt with subsequently in the relevant paragraphs. As these issues are fundamental, it will require further investigation and analysis to amend the Local Plan satisfactorily.
Modifications requested	<p>Para.2.1.5-2.1.7: The challenges facing the settlements in and adjoining the Heritage and Undeveloped Coast include substantial stress in the housing market, with median house prices in 2020 at twice the level of the District, together with second and holiday home ownership at up to 4 times the District level. In addition, little attention is given to the traffic consequences of the rapidly growing tourist industry, partly driven by the ever-expanding Holkham Estate recreational activities. The issues are left to be resolved by the Neighbourhood Planning process, but without any recognition in the Local Plan of the need for a planning policy framework to be provided by it. This will make the task of addressing these extremely significant issues a much bigger challenge than it should be. Further, the Local plan has, in its detailed allocations, given insufficient weight to the protection of the AONB and other environmental designations.</p> <p>Para. 2.1.18: The Local Plan is ineffective as there is no reference to the significance of the B1105 link from Fakenham to Wells/Holkham and the A149 from Weybourne to Hunstanton in serving the substantial and growing tourist industry; justification of that significance will require traffic survey and analysis.</p> <p>Para. 2.1.19: there needs to be reference to the national significance of the juxtaposition of the sand features (dunes, cusped forelands and spits) and the salt, fresh and brackish water marshes of the AONB in the Heritage and Undeveloped Coast area. It is the location of the largest privately owned National Nature Reserve which forms part of the rapidly developing Holkham Estate visitor attractions.</p> <p>Para. 2.1.26: there needs to be reference to the concentration of second and holiday homes in Wells and adjoining villages, at similar if not higher levels to Salthouse (which is referenced), but on a much larger scale. The Local Plan is ineffective in not providing a policy framework to address the issue.</p> <p>Para. 2.1.27: needs to be a reference to Wells and adjoining areas where the median house prices are among the highest in the County and at double the District level (over £500,000 - ONS March 2020). As immediately above, the Plan is ineffective and unjustified in not providing the proper context for planning policy development. Comparator areas include Suffolk, Devon and Cornwall.</p> <p>Para. 2.2.11: the statement is misleading; the high incidence in Wells and district of second and holiday homes (over 37%) is in the market housing sector and any purpose-built holiday accommodation is in addition.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	The issues are of such fundamental significance.
Attachment(s)	
Consultation Point Title	Spatial Portrait, Vision, Aims & Objectives
Consultation Point Number	2
Section of the Plan	CS Policy SS1, 2.0.1 (b), 2.1.3, 2.2.10, 3.0.10
ID	LPS362
Response Date	05/03/2022 14:36:17
Name	Mr Edward Witton

Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	Target delivery 12,096 including windfall of 2,295. Allocation for Rural Sites (Countryside) outside designated growth area zero. NPPF 2.8 (9) requires sustainability in respect of economic and social considerations by ensuring that a sufficient number and range of homes are provided to meet the needs of present and future generations. The NNDC Plan fails to address the needs of the Rural Community (currently classified as "Countryside") which represents approximately 33,000 people i.e. 31% of the total population based on ONS mid-year 2016 population statistics, including 18 constituent villages each with over 500 people. The Plan does not provide for any growth in this significant constituent, nor yet any Council stimulus to promote these villages (Neighbourhood Plans are impractical in view of the volunteer effort required). Rural Communities have the right to a full and rich life, wherever they live. Yet many people in Rural Communities (Countryside) are being cut-off, isolated and without the means to live an independent life. The proposed plan further threatens that isolation. The consequence is that Rural Villages and hamlets will continue to decline rather than be allowed to " thrive and grow " contrary to NPPF 5.78. In 2019 an NNDC planning refusal (Appeal Reference Y2621/W/19/3222639) was overturned by the Planning Inspectorate on the basis that "any limited harm from the conflict with CS policies SS1 and SS2 would be outweighed by the modest social benefits provided by rural housing supply and the vitality of the village." The method for determining "Small Growth Villages" and "Countryside" isn't sound - there are villages which are classified as "Countryside" with a population which far exceeds that of some designated "Small Growth Villages" e.g. Scottow 1,785, Tunstead 1,083 and Worstead 972. One of the designated "Small Growth Villages" (Binham) has a population of less than 300. While it may have some services at present, the chances of them being retained in the longer term is remote. The Plan has failed to take into account NPPF 79: "To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby."
Modifications requested	The strategy of identifying "Growth Villages" should be revisited with a plan to support all villages with a population of over say 500 being viewed from a forward looking perspective to allow them to "thrive and grow" as per the NPPF.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Spatial Portrait, Vision, Aims & Objectives
Consultation Point Number	2
Section of the Plan	2 Spatial Portrait, Vision, Aims & Objectives
ID	LPS86

Response Date	16/02/2022 13:58:59
Name	Dr Victoria Holliday
Organisation	NNDC
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	There are concerns in Coastal Ward that much of the proposed development will become second or holiday homes. This is felt to be detrimental to communities in terms of sustainability, and to have a negative impact on affordability of homes for locals.
Modifications requested	The LA should consider a restriction on new houses in coastal villages so they cannot be sold as second or holiday homes, for example through principal residency requirements, and planning permission should be considered for change of use of existing homes from principal residency. Planning permission shd be considered for change of use of existing homes from principal residency to second or holiday homes.'
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Spatial Portrait, Vision, Aims & Objectives
Consultation Point Number	2
Section of the Plan	2 Spatial Portrait, Vision, Aims & Objectives
ID	LPS380
Response Date	07/03/2022 11:18:00
Name	
Organisation	D L Ritchie Will Trust
Agent Name	David Jones
Agent Organisation	Armstrong Rigg Planning
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared	It is not consistent with national policy

<ul style="list-style-type: none"> * It is not effective * It is not justified * It is not consistent with national policy 	
Explanation	<p>SEE ATTACHED FILE</p> <p>The stated plan period is 2016-2036 and the North Norfolk Local Development Scheme: Indicative Timetable December 2021 forecasts that the Local Plan will be adopted in June 2023. This means that on adoption the plan period will have 13 years remaining. This is contrary to national policy at NPPF paragraph 22 that requires strategic policies to look ahead over a minimum 15 year period from adoption. The plan cannot be considered sound if it is contrary to national policy and the plan period must therefore be extended to 2038 as a minimum. This is a significant issue as the need to extend the plan period will have a knock-on effect on the level of housing growth required.</p>
Modifications requested	<p>SEE ATTACHED FILE</p> <p>We consider that this issue is too significant to be resolved as part of main modifications to the plan during examination and therefore recommend that the Council take a step back to resolve this issue before undertaking a further Regulation 19 consultation. The plan period should be extended to at least 2038 and the housing requirement/allocations increased accordingly.</p>
Appear at examination hearing session(s)? <ul style="list-style-type: none"> * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s) 	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To participate in the debate
Attachment(s)	Enclosure 1 - Plan Period.pdf
Consultation Point Title	Spatial Portrait, Vision, Aims & Objectives
Consultation Point Number	2
Section of the Plan	2 Spatial Portrait, Vision, Aims & Objectives
ID	LPS493
Response Date	07/03/2022 18:30:24
Name	Sarah Peters
Organisation	ABZAG Ltd
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? <ul style="list-style-type: none"> * Yes * No 	No
Has the duty to cooperate been met? <ul style="list-style-type: none"> * Yes * No 	
Do you consider the plan to be Sound? <ul style="list-style-type: none"> * Yes * No 	No
Reason(s) not Sound <ul style="list-style-type: none"> * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy 	It is not effective It is not consistent with national policy
Explanation	<p>The National Planning Policy Framework at paragraph 22 states 'Strategic policies should look ahead over a minimum 15 year period from adoption.'</p> <p>This is clearly not going to be the case with the NNDC Local Plan and demonstrates how it fails to meet the requirements of the NPPF.</p> <p>The NNDC Local Plan has a Plan Period 2016 – 2036, the NNDC Local Development Scheme (LDS) updated December 2021 has the Local Plan adoption June 2023 – failing to meet the minimum 15 years</p>

	<p>required from adoption by only having 13 years at best – demonstrating Local Plan is NOT SOUND.</p> <p>This also brings into question the supporting evidence, as the evidence will fall short of the minimum required by the NPPF in formulating the strategic policies, which means all the subsequent justifications are based on poor or incomplete evidence base.</p>
Modifications requested	The NNDC Local Plan plan period needs to be extended by at least two years, although history suggests that NNDC will not deliver to this timetable, therefore, further consideration should be given to a realistic plan period to meet the minimum requirement.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Spatial Portrait, Vision, Aims & Objectives
Consultation Point Number	2
Section of the Plan	2 Spatial Portrait, Vision, Aims & Objectives
ID	LPS764
Response Date	28/02/2022 08:14:00
Name	Mrs Debbie Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>SEE LPS 716-746 FOR DETAILED RESPONSES</p> <p>SEE ATTACHED FILE</p> <p>As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully considered at all stages and levels of the local planning process.</p> <p>We have reviewed the Draft Plan and consultation material. As a general comment, Historic England welcomes the emerging plan and work undertaken to date. Our comments below should be read with reference to our previous comments. Please also see our detailed comments in the attached table Appendix A.</p> <p>SUMMARY</p> <p>Whilst we consider many aspects of the plan to be sound we have identified issues with some of the policies and site allocations which do compromise the overall soundness of the plan.</p> <p>Under paragraph 35 of the NPPF some aspects of this Plan are unsound as they have not been positively prepared, are not justified, effective, or consistent with national policy. We have identified below some of the key areas where we find the Plan unsound and what measures are needed to make the Plan sound. In summary we highlight the following three issues namely the Historic Environment Policy, Heritage Impact Assessments including Policy wording and the Wind Energy Map.</p>

1. Historic Environment Policy ENV7

Although this policy is significantly improved from the Regulation 18 version, there are a number of remaining issues with the policy. These are set out in detail in the attached Appendix. The Historic Environment Topic Paper helpfully charts the evolution of the policy.

At one stage in the policy evolution there were more subheadings in the policy. This made more sense. Whereas now, for example Conservation Areas are listed under non-designated heritage assets (when they are designated heritage assets). There are also a number of other minor discrepancies that have been introduced through the editing process. Therefore, we suggest that you consider reinstating the second version of the policy as drafted on page 18 of the Topic Paper. We would be pleased to review your revised wording.

2. Historic Environment Paper including Heritage Impact Assessments

Historic Environment Topic Paper and Heritage Impact Assessments welcomed. We are very pleased to see that you have prepared a Historic Environment Topic Paper as part of your Plan preparation process and forming part of the evidence base for your Local Plan. In particular, we are encouraged to see the completion of Heritage Impact Assessments of all the proposed allocations in the Plan. These are included in the Historic Environment Topic Paper. They provide a robust evidence base, helping to justify the allocations and ensure that they are consistent with national policy.

HIA Recommendations should be included in policy

We had understood that the recommended policy wording (from Stage 3 of the HIAs) was going to be included in the policy wording. However, this wording is not included in the Plan policies.

Ideally the Plan should be amended to include this recommended policy wording from the HIAs and to reflect the good and thorough work that has been done with the Heritage Impact Assessments. Our advice note HEAN 3 on Site Allocations makes it clear that Mitigation and enhancement measures identified as part of the site selection process and evidence gathering are best set out within the policy to ensure that these are implemented.'

We do recognise that you may take the view that the proposed wording from the HIA may make the policies overly long in respect of the historic environment and so we may be able to consider some compromise wording which says something like,

'Development should conserve and enhance the significance of designated and nondesignated heritage assets including x,y and z. Development should incorporate the Heritage Impact Assessment recommendations for mitigation and enhancement including...'

In order to make the Plan sound, modifications should be made to the policy. We would like to discuss this matter further with you.

Key Development Consideration Diagrams should be included in Plan

In addition, for a small number of sites (BRI01, BRI02, H20, MUN03/A and ST23/2) the HIAs included Key Development Consideration Diagrams (see Appendix E of the Historic Environment Topic Paper). The intention was for these diagrams to be included in the Plan too. We note that they are not in the draft Plan. We continue to strongly recommend the inclusion of these diagrams in the Plan. They show, for example, where open space should be provided to protect the setting of heritage assets or where open space should be maintained to prevent coalescence between settlements.

Issues in relation to specific HIAs

Whilst we agree with the findings of most of the HIAs, there are some areas where key aspects are missing. We highlight those below.

a) Site NW62 North Walsham

There is no mention of the battlefield in the HIA for North Walsham 62. There had been some discussion of a study to look into the location of the battlefield in more detail in relation to the ongoing masterplanning work. However, I understand from our recent conversation that this has not been done. You did highlight however that it was planned to have open space and sports fields in the southern part of the site. We consider that this would be helpful to protect the battlefield and its setting. To this end, we recommend that this requirement is included in the policy wording in the Plan.

b) Site C22/1 West of Pine Tree Farm, Cromer

In our Regulation 18 reps we had previously advised that there should be some open space in the southern portion of the site around Pine Tree Farm to protect its significance. However, the recommendations of the HIA do not include this but focus

much more on boundary treatment. We again advise that built development is confined to the northern half of the site with the southern portion of land being used for sports facilities, allotments and public open space to retain a sense of openness and connection between the farm and the wider agricultural landscape beyond. We suggest that the wording should also include the following:

'Preserve and enhance the setting of the grade II listed Pine Tree Farmhouse through careful layout, design and landscaping. The southern half of the site should be left open and used for allotments, public open space and sports facilities and the eastern boundary of the site, adjoining the farmhouse should be carefully landscaped.'

c) Changes to allocations since preparation of HIA

We understand that there have been some changes to some of the site allocations since the HIAs were prepared; notably for the Mundesley site MUN03/A, which is now smaller and Cromer site C22/1 which is now much larger. The HIAs should be revisited to reflect the revised site boundaries.

3. Wind Energy Areas Map Figure 5

Para.155 of the NPPF advises LPAs to consider identifying suitable areas for renewable and low carbon energy sources in their plans and strategies. Our advice note on Renewable Energy includes advice on an appropriate methodology for identifying such areas in Plan making (see paras 23- 27; i.e. all heritage assets in the area should be identified, arbitrary distance measurements should be avoided, and the setting of heritage assets should also be included as a consideration). As we understand it, the setting of heritage assets has not been included in the Landscape Sensitivity Assessment and subsequent development of Figure 5 (Wind Energy Areas map) in the Local Plan. Therefore, it is our view that the evidence base to support the identification of areas suitable for such development is incomplete – it is not justified in terms of potential impacts on the historic environment. We would like to discuss this with you further.

Final Comments

In preparation of the forthcoming North Norfolk Local Plan, we encourage you to draw on the knowledge of local conservation officers, archaeologists and local heritage groups.

Please note that absence of a comment on an allocation or document in this letter does not mean that Historic England is content that the allocation or document forms part of a positive strategy for the conservation and enjoyment of the historic environment or is devoid of historic environment issues. Where there are various options proposed for a settlement, identification of heritage issues for a particular allocation does not automatically correspond to the support for inclusion of the alternative sites, given we have not been able to assess all of the sites.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	220221 HE Response N Norfolk Local Plan Reg 19.pdf
Consultation Point Title	Spatial Portrait, Vision, Aims & Objectives
Consultation Point Number	2
Section of the Plan	2 Spatial Portrait, Vision, Aims & Objectives
ID	LPS786
Response Date	20/05/2022 15:12:00
Name	Mr Darl Sweetland
Organisation	Anglian Water
Agent Name	

Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>Anglian Water considers that for development which requires investment in expanded or new infrastructure – particularly in the later stages of the Plan that there is a reasonable prospect that the Council could show that proposals can be developed within the timescales envisaged. Overall, Anglian Water considers the draft Plan is sound with minor but important changes to address clarification points and so provides the basis on which deliver homes, jobs and the infrastructure which underpin our daily lives.</p> <p>Challenges, Vision and Objectives (Chapters 1 and 2)</p> <p>SUPPORT: Anglian Water supports the overarching vision of climate resilient sustainable development as this mirrors our public interest commitment to bring environmental and social prosperity to the region and to be achieve net zero carbon emissions by 2030. The issue of water supply to the east of the Anglian Region which will be exacerbated by climate change is a factor being considered by water companies and partners across the East of England. We would urge the Councils in Norfolk to respond to the current Water Resources East regional plan consultation and to continue to engage with WRE and Anglian Water as we develop and consult on the Water Resources Management Plan over the next year.</p> <p>CLARIFICATION: The highlighting of past flooding issues is supported particularly given the risks from climate change. As drafted though paragraph 2.1.22 is not as clear as it could be on the relative risks and source(s) of flooding. Given Anglian Water's limited role in managing surface water that is currently directed to the public sewer network, a table or reference to an evidence document setting out the listed locations, sources of flooding and risks as well as responsibilities – for example on culverts - including developers, would provide a sounder basis for policy. Similarly, a clearer assessment/ summary for flooding referenced in paragraph 2.2.16 and not including in the documents referred to in 2.2.17 would assist in showing the plan is justified.</p> <p>NOTE: The median house price of £250,000 (2.1.27) is not greatly less than UK average at £270,000 indicating with reference to 1.6.2 and viability questions that the ability for development to fund the infrastructure including environmental measures required to support it is not markedly worse than other areas of the country.</p> <p>NOTE: The predominance of transport as the source of greenhouse gas emissions (2.1.34) would support the spatial distribution of growth in locations which have existing low carbon transport options (2.2.5). Those locations would also be more likely to be served by existing infrastructure and services which would reduce the need for additional grey infrastructure and associated embedded carbon. Focusing growth on sustainable locations also supports efficient investment in resilience and adaptation measures (2.2.2).</p> <p>CLARIFICATION: Figure 1 shows that residents and businesses wastewater needs contributed 0.59% of CO2 equivalent in the district. The figure does not show the contribution from communities in North Norfolk use of water. This is presumably within the contributions from residential, agriculture etc?</p> <p>SUPPORT: Anglian Water supports the Plan Spatial Vision in view of the focus of growth in three towns and the utilisation of existing infrastructure capacity.</p> <p>CLARIFICATION: Without a quantitative assessment of the carbon implications to balance alongside and pros and cons of 'wider countryside' growth it is not possible to conclude that the 'long-term sustainability of a settlement' has been assessed in the wider context</p>

	<p>of district wide growth. The Vision's approach of leaving the question of the design of development 'to minimise resource and energy use' bakes in potential growth in the Local Plan which may not be the most sustainable spatial location including the use of existing infrastructure. Whilst bullet points in 1, 2 and 5 in 2.4.1 (1) refer indirectly to the use of existing infrastructure the Vision should include a sequential approach for the Local Plan based on the Sustainability Hierarchy. This approach is set out elsewhere in the plan at 3.0.4, for example but not in the Vision.</p> <p>SUPPORT: Anglian Water supports the Objectives in 2.4.1 seeking to minimise water use, protecting water quality, minimising impact of water pollution and improving resource efficiency.</p>
Modifications requested	<p>Anglian Water recommends that the points raised in its Regulation 19 stage representations are captured in a Water Environment topic paper drafted by the Council to support the Plan along with comments from the Environment Agency and Natural England. That topic paper would support proposed modifications to the Plan. We propose that a Statement of Common Ground is then drawn up by the Council and provided to Anglian Water and related parties. This would ensure that the Inspector considering the Plan can consider the areas of agreement – including modifications on policy and allocations and those areas which may require additional evidence or submissions.</p>
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Spatial Portrait, Vision, Aims & Objectives
Consultation Point Number	2
Section of the Plan	2 Spatial Portrait, Vision, Aims & Objectives
ID	LPS757
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	
* Yes	
* No	
Has the duty to cooperate been met?	
* Yes	
* No	
Do you consider the plan to be Sound?	
* Yes	
* No	
Reason(s) not Sound	
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	<p>SEE ATTACHED FILE</p> <p>Population</p> <p>1.The population used in the census does not include the number of people with second homes and holiday homes. When these are taken into account our population for much of the year is substantially higher. Therefore, the need for services is substantially underestimated. The forecast population increase of approximately 11,000 residents again does not include those that will buy properties for second homes or holiday homes, and thus again substantially underestimates the actual number of people residing in North Norfolk during the high tourist season.</p>

	<p>2. Much of the rise in population, especially in coastal areas, will be from people wishing to retire. The social and health care sectors in North Norfolk cannot cope at present, the number of truly affordable houses will not meet the needs of workers within these care sectors. Pay in these sectors is too low for workers to be able to afford to live here. This will cause further stresses on our rural, health and social care system.</p> <p>3. This plan does nothing to address access to higher education, sports facilities or skilled jobs for those in rural areas. This will leave our young people further disenfranchised. By centering housing in just a few towns, villages will further suffer a drain of youth, leaving elderly and vulnerable residents abandoned with a lack of services.</p>
Modifications requested	
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	Weybourne Parish Council Village Survey.pdf
Consultation Point Title	Spatial Portrait, Vision, Aims & Objectives
Consultation Point Number	2
Section of the Plan	Spatial Vision, Strategic Aims and Objectives Policies HOU1, HOU2, HOU8, HOU9, DS1 and C16
ID	LPS361
Response Date	07/03/2022 11:10:58
Name	Mr John Fleming
Organisation	Gladman
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	Yes
* Yes	
* No	
Has the duty to cooperate been met?	Yes
* Yes	
* No	
Do you consider the plan to be Sound?	No
* Yes	
* No	
Reason(s) not Sound	It is not justified; It is not consistent with national policy
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	SEE ATTACHED FILE Please see attached representation. Gladman are largely supportive of the Local Plan as a whole but consider some policies require modifications to ensure they are consistent with national policy and are justified by appropriate evidence. Gladman consider that these changes can be implemented by Main Modifications.
Modifications requested	SEE ATTACHED FILE
Appear at examination hearing session(s)?	Yes, I wish to participate in hearing session(s)
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	Please see attached representation.
Attachment(s)	North Norfolk Local Plan - Reg 19 consultation.pdf Appendix 1 - Location Plan.pdf

2.1 Spatial Portrait of North Norfolk

Consultation Point Title	Spatial Portrait of North Norfolk
Consultation Point Number	2.1
Section of the Plan	2.1.9
ID	LPS623
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	<p>2.1.9 Cromer (2011 Census population 7,683) is an attractive Victorian resort town, dominated by its medieval church tower and pier. Cromer's popularity as a holiday resort began in the Georgian era, and expanded greatly as a result of the coming of the railway in 1877. As well as its tourist role, it acts as a local centre for retail, local government and health services and hosts the District's main hospital.</p> <p>This clause does not meet the "Justified" test of soundness.</p> <p>While it is true that Cromer hospital is the largest hospital in the District, it is not a hospital that in any way fully meets the needs of local people: it has no A & E department, it does not provide in-patient treatments. Residents are therefore obliged to travel either to Norwich or Kings Lynn for the majority of hospital treatments. As it is recognised that much of the housing growth will be taken up by retired people moving into the area, who will have greater need for hospital visits, this will create additional pressure on the highways and increase carbon emissions. Moreover, the long journey times to the hospitals – e.g. from Weybourne at least one hour to either of the main hospitals by car, 2½ hours by public transport (and the times of buses mean that it is almost impossible to get there and back in a day) – have a detrimental effect on the quality of life of residents.</p>
Modifications requested	The Plan needs to recognise the issue of access to hospitals and to avoid building housing that will pull in people from out of the District. The aim should be to meet existing local need, rather than creating additional needs and additional problems.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Spatial Portrait of North Norfolk
Consultation Point Number	2.1
Section of the Plan	2.1.5 - 2.1.7
ID	LPS120
Response Date	20/02/2022 16:59:47

Name	Mr. John Edwards
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	The strategic content of the Local Plan is unsound as it provides no guidance for dealing with the special challenges faced by the settlements in the Heritage and Undeveloped Coast area in the far west of North Norfolk District. These challenges include significant stress in the housing market, with median house prices at twice the level of the District together with second and holiday home ownership at up to 4 times the District level. In addition, little attention is given to the traffic consequences of the rapidly growing tourist industry, partly driven by the ever expanding Holkham Estate recreational package. The issues are apparently left to be resolved by the Neighbourhood Planning process, but without any recognition in the Local Plan or planning policy framework provided by it. This will make the task of addressing these extremely significant issues a much bigger challenge than it should be.
Modifications requested	The specific paragraphs are commented on subsequently, but any revisions required to address the shortfall will require further investigation.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	The issues to be discussed are raised later in this submission.
Attachment(s)	
Consultation Point Title	Spatial Portrait of North Norfolk
Consultation Point Number	2.1
Section of the Plan	2.1 Spatial Portrait of North Norfolk
ID	LPS292
Response Date	02/03/2022 12:58:45
Name	Mr Clive Albany
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes	No

* No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<p>The Local Plan does not adequately deal with the issue of principal residency housing status for those communities where there are significant levels of second and holiday home ownership. The Local Plan does not effectively address this key issue in coastal communities at all.</p> <p>As an obvious example, Blakeney has been designated a Large Growth Village (upgraded from the last Local Plan where it was designated as a Coastal Village). It is unclear why the status was changed. There cannot be any justification for this change within this Local Plan except to justify the preferred site allocation of BLA04/A to build 30 more homes the majority of which are likely to be second homes and/or holiday lets.</p> <p>In Blakeney, the level of second homes is stated by NNDC to be around 30% and analysis in 2019 of the National Business Rates Register shows a further 15% of properties registered to pay business rates (i.e. holiday lets). Therefore only 55% of properties are primary homes.</p> <p>NNDC Planning have always had the opportunity to designate all new builds with principal residency status when granting planning permission. NNDC have never addressed this issue. This is evident in recent new builds in Blakeney, as in "Harbour Way" where 11 out of the 12 market housing units are second homes, in "The Chase" where 7 expensive properties have been built, in "Samphire Way" where 6 out of the 7 are second homes, and it is to be expected (based upon the high prices recently advertised) that in the nearly complete "Kimberley" site on New Road, all of the 7 houses will be second homes or holiday lets. These sites account for 31 new builds.</p> <p>It will be no doubt be the case with the Preferred Allocation site BLA04/A where 19 of the 30 properties are designated as open market status properties. NNDC is effectively promoting a "ghost village" environment in this Local Plan by not changing it's policy to confirm primary residency status of new builds</p> <p>Blakeney (like many other communities) primarily needs social housing to be built not private residences which can be used as business-rated holiday lets which invariably do not pay any local council taxes at all – i.e. that make no contribution to the costs of providing universal services or facilities.</p>
Modifications requested	To make the Local Plan sound and locally credible, NNDC should change its policy immediately and designate all new builds as a primary residence in Coastal villages.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Spatial Portrait of North Norfolk
Consultation Point Number	2.1
Section of the Plan	2.1 Spatial Portrait of North Norfolk
ID	LPS372
Response Date	07/03/2022 10:51:32
Name	Mr Christopher Yardley
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes	

* No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified; It is not consistent with national policy
Explanation	<p>Re; Objection to overall number of new dwellings proposed in North Norfolk District Council new Local Plan</p> <ol style="list-style-type: none"> 1 I wish to make a representation to object to the overall number of new dwellings proposed in the new Local Plan on the following grounds. 2 The scale of development – taken together with pre-existing allocations, appears to exceed the Government requirement for housing allocation for this district 3 The provision of this amount of development is intended to encourage population shift and migration – which has been occurring increasingly in the last 10 years – from urban areas of the south east and midlands to the rural areas of Norfolk. (Section 2.2.10 makes a statement in relation to projected population growth and links this to house price inflation but does not in any sense indicate where previous and future population growth push is coming from – this is a fundamentally important element which is missing from the ‘planning’ process and underpins why inflation in house prices has occurred (they are now linked to house prices in the south east where purchasers of new properties come from) and effectively means that supply can never be sufficient to have any impact on price through supply / demand processes, and similarly cannot appropriately predict ‘required housing’ as it is more or less infinite given the pool of demand from the south east of the Country – particularly from retired people thus skewing the demographic age range 4 As such the development is clearly contrary to the stated objectives in Section 2.0.1 of the Local Plan which are; <p>That development should be ‘climate resistant sustainable development’</p> <p>It has not been demonstrated that development in this area can ‘ensure mitigation and adaptation to climate change’</p> <p>Or how it would ‘enhance biodiversity, or support a move to a low carbon economy’ due to the clearly increased reliance on private car use compared with the more urban areas from which the population is relocated from where public transport is more prevalent.</p> <p>– Or how the loss of habitat due to physical development / increases in disturbance and damage to the many protected habitats in north Norfolk (particularly coastal and riverine) could in any way ‘enhance biodiversity’ or allow ‘mitigation’</p> <ol style="list-style-type: none"> 1 Resources – particularly water and waste water management – are, within the east of England and North Norfolk in particular – beyond capacity and the ground water resources are therefore being depleted in a manner which is not sustainable. East Cambs District Council has now imposed a moratorium on new development as they have determined that this is not sustainable and contrary to national Planning Policy. I would suggest that the same principle applies to North Norfolk and that the existing proven depletion of water resources is having an unsustainable impact on future water provision and on the favourable ecological state of surface water elements such as the River Wensum, Bure, Glaven and other rivers. Similarly impacts on waste water discharge are adversely and unsustainably impacting on the environment causing pollution issues to riverine habitats and public health. The proposed development scale will significantly accelerate this process and lead to an even more unsustainable environment which is not in any way adapted to climate change and cannot in any way comply with statements such as ‘enhance biodiversity’ or ‘protect special landscapes or protected habitats’ also contained within the Local Plan and reinforced by the policy

	<p>requirements of the NPPF 2018 and now the Environment Act 2021</p> <ol style="list-style-type: none"> 2 The scale of development similarly prevents compliance with a number of policies contained within the Local Plan and is contrary to the stated intentions of the Local Plan 3 As an example this is evidenced in the 'Spatial Vision' (2.3) for North Norfolk – particularly those statements in relation to protecting the 'character' of the landscape and the special qualities of the North Norfolk AONB, Norfolk and Suffolk Broads; cannot 'protect nature or improve biodiversity', and will not 'improve adaptation and mitigation towards climate change' 4 Given that the Local Plan makes the statement that North Norfolk is one of the most rural districts in the Country, fundamentally it seems illogical to assess growth in relation to 'demand' when the source and nature of the demand has not been understood or addressed, and when it is clear to most of us that demand comes from outside the District / County from mainly urban areas in different parts of the Country. Relocating people into a part of the Country which is very dry, has significant existing water and future climate change challenges and when other areas of the Country are better adapted (or are assessed to have significantly lower adverse impacts) to accommodate population growth or movement in relation to these factors is again illogical and contrary to the principles in the NPPF / Environment Act. 5 To remedy the problems identified in the Local Plan and its allocation of numbers of dwellings, the Plan needs to conduct a water resources assessment of the same type and scope as that provided by East Cambs DC, carry out further impact assessments on Protected Habitats in relation to disturbance, carry out an assessment of recent population growth in the District to assess where demand is coming from and use this to assess appropriate demand and compare climate change resilience between retaining populations in existing urban areas and translocating them to new urban areas in rural districts. This should then be used to inform the numbers of properties that are provided for the district. If the numbers are currently above those required by Govt assessment this should also be used as a reason to lower numbers required. The stated numbers currently provided (9000) or 11% growth of population in 20 years is clearly not a sustainable figure in relation to the stated aims contained in the Plan.
Modifications requested	To remedy the problems identified in the Local Plan and its allocation of numbers of dwellings, the Plan needs to conduct a water resources assessment of the same type and scope as that provided by East Cambs DC, carry out further impact assessments on Protected Habitats in relation to disturbance, carry out an assessment of recent population growth in the District to assess where demand is coming from and use this to assess appropriate demand and compare climate change resilience between retaining populations in existing urban areas and translocating them to new urban areas in rural districts. This should then be used to inform the numbers of properties that are provided for the district. If the numbers are currently above those required by Govt assessment this should also be used as a reason to lower numbers required. The stated numbers currently provided (9000) or 11% growth of population in 20 years is clearly not a sustainable figure in relation to the stated aims contained in the Plan.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Spatial Portrait of North Norfolk
Consultation Point Number	2.1
Section of the Plan	2.1 Spatial Portrait of North Norfolk
ID	LPS414
Response Date	07/03/2022 18:21:33
Name	
Organisation	Richborough Estates

Agent Name	Mrs Raj Bains
Agent Organisation	Boyer Planning
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	<p>Please refer to full statement of representations (see LPS263) on behalf of our client.</p> <p>The spatial vision, aims and objectives set out in the proposed Local Plan 2036 (Regulation 19 Submission Version) are supported overall. The vision recognises key areas for significant growth and development.</p> <p>We strongly support paragraph 2.1.13 of the emerging Local Plan that sets out that North Walsham is unconstrained in landscape and ecological terms relative to other parts of the District, which lie within the Norfolk Coast AONB and The Broads. North Walsham is a suitable and sustainable location, which provides a variety of public services, retail facilities, and employment opportunities with good levels of accessibility.</p> <p>Paragraph 2.1.14 of the emerging plan notes that North Walsham is the largest settlement in the District and that the town is increasingly becoming dormitory in its function. This presents an increasing need for North Walsham to boost its role as a large growth town in order to retain the population of the area, and provide a healthy population base to support the viability and vitality of the town centre. The Sustainability Appraisal (SA) (2022) identifies North Walsham as having potential for housing and employment growth. We strongly support this and that more housing and employment development than is currently proposed should be allocated to support and strengthen the role of North Walsham in the District.</p> <p>The SA reports that the District is experiencing growth pressures for retail growth, which influence consumers to travel to Norwich or Kings Lynn due to the higher retail offer. This affects the District's inability to attract inward investment by larger retailers. The 2017 Retail and Town Centre Study concludes there is limited expenditure growth to support new retail floor space. This demonstrates a need for significant housing and economic growth to support the role and function of the Large Growth Towns. We would suggest that the need for significant housing growth is reflected within the strategic objective – Enabling Economic Growth.</p> <p>Paragraph 2.2.13 of the emerging Local Plan notes a decline in manufacturing and agricultural jobs within the district, and further recognises how parts of the District are influenced by travelling to Norwich due to the close proximity of a wider range of jobs and strong retail offer. With more and more people working from home, this increases the need to have access to a wide range of facilities and services within close proximity. It is important that the objectives reflect this and are responsive to socio-economic changes in the market.</p> <p>The provision of additional growth in North Walsham would result in a level of provision that would both meet the District's current housing need and provide for additional population growth that would in turn help sustain economic growth and increase footfall and investment in the town centre. S106 / CIL contributions from development also would contribute to providing the necessary infrastructure needed to meet the needs of the District that arises from new development.</p> <p>To go hand in hand with future inward investment including town centre improvements as set out in the emerging plan, we suggest a range of sites are put forward within the emerging plan for North Walsham that would come forward and deliver in an expedient manner. The current approach to relying on longer term growth from the proposed SUE</p>

	alone risks the town centre and economic prosperity of the town declining further in the short term. Our suggested approach would assist in meeting the strategic objectives of the proposed plan by delivering economic growth, whilst meeting housing needs. The allocation of Land at Paston Gateway would complement rather than compete with the delivery of the SUE which is proposed as the centrepiece for housing delivery for the North Norfolk Local Plan.
Modifications requested	In response to the Spatial objective - Enabling Economic Growth, we suggest that this includes the need for significant housing growth to help support town centre growth and attract inward investment to support the growth of the District.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	Our representations provide fundamental concerns about the proposed policies contained in the Local Plan. It is critical the Inspector hears our views on why we think the Plan is unsound and will fail to meet local housing needs of North Norfolk. Ultimately, our views could help assist the Council in ensuring there is an adequate supply of new housing across the District and throughout the short term, medium and long term period of the Local Plan.
Attachment(s)	
Consultation Point Title	Spatial Portrait of North Norfolk
Consultation Point Number	2.1
Section of the Plan	Various
ID	LPS320
Response Date	04/03/2022 10:48:28
Name	Mr David Spray
Organisation	The Marine Management Organisation
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	
Modifications requested	Please find below a series of comments relating to specific points in the Proposed Submission Version North Norfolk Local Plan. The comments reflect specific examples where Marine Plans and the Marine Policy Statement could be included and areas of admittance that may be of relevance to the planning inspectorate. The format of this comment has been directed after communication from North Norfolk District Council (attached email for reference). The original response to this consultation has been attached for further reference. 1.5.1 Although no longer specified under duty to cooperate in online government guidance, according to government plan making guidance Coastal Planning authorities will need to take into account these plans when creating local plans. Emitting reference to Marine Plans under the duty to cooperate may result in the inspectorate questioning the soundness of the Local Plan document.

2.1.21

By name a Special Area of Conservation in the Marine Area is mentioned within the plan in addition to other designations with marine relevance. The geographical overlap with the marine area as a coastal authority should be reflected in reference to the East Marine Plans. Coastal local authorities are required to regard these plans when preparing local plans under the Coastal in accordance with the Marine and Coastal Access Act 2009 58(3) and the inspectorate may identify this exclusion as an issue.

2.2.6

Here the National Planning Policy Framework is signposted in relation to national context for climate change action. Similar signposting of the Marine Planning Policy Statement would provide context for marine and coastal activities across a range of sectors with relevance to climate change action and adaptation.

2.2.14

Here coastline and beaches are specifically mentioned in context of tourism and local economic prosperity. Both sectors are encompassed by East Marine Plan Policies (E-TR1, E-TR2, E-EC1, E-EC2, E-EC3). Signposting of Marine Plan Policies would better the policy context of the section.

2.2.17

Here Shoreline Management Plans are referred to providing context of current coastal change management. Inclusion of the East Marine Plans would be helpful to demonstrate that the plans have been regarded within the North Norfolk Local Plan.

3.0.10

Here referral to sustainable development as required by the NPPF has been outlined. Similar reference to Marine Plan policies with regard to relevant NNLP policies (e.g. CC2, CC3, ENV3 and ENV4) would demonstrate that marine plans have been regarded within these local plan policies.

3.2

Reference to national frameworks and LPA charters around renewable energy and low carbon development. Highly relevant to East Marine Plan Policies E-CC1, E-CC2, E-EC3 and E-WIND2. WIND2 connects to supporting infrastructure to offshore wind energy development and hence has relevance to landfall sites and cabling infrastructure. Reference to the marine plan in a similar fashion to other documents (3.2.10 – The Ten Point Plan for a Green Industrial Revolution for example) and frameworks in this section would demonstrate to the inspectorate that marine plans have been regarded.

3.3

Reference Government responses and strategies could be bolstered with reference to Marine Plans in the context of reduced carbon emissions for marine and coastal developments (East plan policy E-CC2) – this marine plan policy has relevance to Local Plan Policy CC3.

3.5.4

High levels of referral to Shoreline Management Plans, referral to Marine Plans for Local Plan policies with overlap and relevance to marine planning would demonstrate regard for marine plans as required under the Marine and Coastal Access Act 2009 58(3).

6.2

There is policy overlap between ENV2 and particularly ENV3 with regard to East Marine Plan Policy E – SOC3. Policies/Marine Plans could be signposted to in a similar way to SMPs (6.4.12).

6.7

There is policy overlap between ENV7 and East Marine Plan Policy E – SOC2. Policies/Marine Plans could be signposted here with reference to the protection of marine heritage features which may exist within the intertidal zone encompassed in North Norfolk District Council Jurisdiction.

Glossary

The only mention of Marine Plans is in the Duty to Cooperate section of the glossary. This does not illustrate regard to Marine Plans within this version North Norfolk Local Plan. Inclusion of marine planning reference, reference to the Marine Planning Policy Statement and other amendments highlighted above and in the attached response letter will demonstrate that North Norfolk District Council have regarded

	the East Marine Plan as required under the Marine and Coastal Access Act 2009 58(3).
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	220215_North_Norfolk_Local_Plan_Reg_19_DS.pdf (2) RE CONSULTATION RESPONSE Proposed Submission Version (Regulation 19 Publication) Local Plan.htm

2.2 Key Challenges

Consultation Point Title	Key Challenges
Consultation Point Number	2.2
Section of the Plan	2.2.1
ID	LPS624
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	<p>2.2.1 The key challenge of the Local Plan is to enable growth to provide the required housing and jobs and supporting infrastructure whilst also conserving and enhancing the landscape and natural environment.</p> <p>This clause does not meet the "Justified" test of soundness.</p> <p>The clause recognises the tension between growth and the environment, but does nothing to address the issue. In fact, much of the "growth" is planned for locations in the AONB, including many of the small and large growth villages and some of the development in the large growth towns. Yet these are where the majority of the special designations are located. It will therefore not be possible to "conserve and enhance the landscape and natural environment.</p>
Modifications requested	The Plan should require landscape and natural environment to take priority over growth. It should recognise the existing need for housing and work for people living in the area, not the arbitrary figure of 9,600 houses.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Key Challenges
Consultation Point Number	2.2
Section of the Plan	2.2 Key Challenges
ID	LPS99
Response Date	17/02/2022 13:20:18
Name	Dr Victoria Holliday
Organisation	NNDC
Agent Name	
Agent Organisation	

Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	What I am hearing in my ward is that building houses to accommodate inward migration changes the culture of our villages, puts stress on infrastructure and makes homes even less affordable for locals. The issue of second and holiday homes is also contentious for the same reasons but also impacts village viability outside peak season.
Modifications requested	Development in coastal villages needs to be either designated as principal residency or affordable. Infrastructure needs to precede development.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

2.3 Spatial Vision

Consultation Point Title	Spatial Vision
Consultation Point Number	2.3
Section of the Plan	2.3.1
ID	LPS217
Response Date	24/02/2022 10:39:00
Name	Ms Sarah Mitchell
Organisation	RSPB
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not consistent with national policy
Explanation	The wording reflects the desire to maintain the natural environment, however, NPPF sets requirements to enhance and not simply maintain the natural environment.
Modifications requested	We suggest amending slightly 'The overall diversity and quality of North Norfolk's countryside and natural environment will have been maintained and enhanced , and the District's many Conservation Areas and Listed Buildings will have been conserved or enhanced.'
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Spatial Vision
Consultation Point Number	2.3
Section of the Plan	2.3.1 Vision
ID	LPS321
Response Date	03/03/2022 19:02:00
Name	
Organisation	Kelling Estate LLP
Agent Name	Roger Welchman
Agent Organisation	Armstrong Rigg Planning
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No

Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not consistent with national policy
Explanation	SEE ATTACHED FILE Vision NPPF paragraph 22 states that where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery. This is clearly the case in North Norfolk given the scale of growth allocated to North Walsham and Fakenham. Paragraph 7.1.10 of the supporting text states that the two largest sites at North Walsham and Fakenham are forecast to deliver some growth beyond the plan period.
Modifications requested	SEE ATTACHED FILE Recommendation: In order to accord with national policy it is necessary to amend the Local Plan's vision statement on page 19 which needs to propose a vision for 30 years ahead from adoption (i.e. 2053).
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	2. Spatial Vision - Representation to Regulation 19 Version of North Norfolk Local Plan.pdf
Consultation Point Title	Spatial Vision
Consultation Point Number	2.3
Section of the Plan	Spatial Vision & 2.3.1
ID	LPS385
Response Date	07/03/2022 11:36:00
Name	
Organisation	D L Ritchie Will Trust
Agent Name	David Jones
Agent Organisation	Armstrong Rigg Planning
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not consistent with national policy
Explanation	SEE ATTACHED FILE Vision NPPF paragraph 22 states that where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery. This is clearly the case in North Norfolk given the scale of growth allocated to North Walsham and Fakenham. Paragraph 7.1.10 of the supporting text states that the two largest sites at North Walsham and Fakenham are forecast to deliver some growth beyond the plan period.

Modifications requested	SEE ATTACHED FILE Recommendation: In order to accord with national policy it is necessary to amend the Local Plan's vision statement on page 19 which needs to propose a vision for 30 years ahead from adoption (i.e. 2053).
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To participate in debate
Attachment(s)	Enclosure 2 - Spatial Vision.pdf
Consultation Point Title	Spatial Vision
Consultation Point Number	2.3
Section of the Plan	Vision, Para 3
ID	LPS716
Response Date	28/02/2022 08:14:00
Name	Mrs Debbie Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	This should specifically mention the historic environment which is more than just conservation areas and listed buildings.
Modifications requested	Include reference to the historic environment in this paragraph. Could also add scheduled monuments and Registered Parks and Gardens.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Spatial Vision
Consultation Point Number	2.3
Section of the Plan	Vision for North Norfolk
ID	LPS78
Response Date	04/03/2022 10:39:01
Name	Mr Paul Timewell
Organisation	Blue Sky Leisure
Agent Name	Mr John

	Long
Agent Organisation	John Long Planning Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective
Explanation	<p>Blue Sky Leisure (BSL) is a significant local employer in the tourist and leisure sector, and employs around 125 people (including seasonal employment) in North Norfolk alone. Annually, the business regularly welcomes around 80,000 staying visitors across its letting accommodation and touring & camping sites (excluding all privately owned holiday homes, which add around a further 25,000 visitors, through holiday sub-lets etc.). These visitors contributed significantly to the local economy, despite the Covid 19 pandemic. BSL therefore has a considerable stake in the Local Plan, and in particular the application of its policies related to economy, tourism, tourism accommodation and coastal erosion. BSL supports the Plan's acknowledgement that North Norfolk's economy is dominated by tourism and the service sector; and that the economic prosperity of North Norfolk is irrevocably linked to the success of the tourism sector. The Council's own evidence suggests that 30% of the District's employment is in the Tourism sector (Economic Impact of Tourism in North Norfolk, 2019) (pre-pandemic).</p> <p>However, Blue Sky Leisure considers that the Local Plan somewhat underplays the importance that tourist accommodation businesses (as part of the wider tourism industry) have to the District's economic success. Also, the Plan does not fully acknowledge the challenges that North Norfolk's tourist accommodation businesses face, including the needs to remain competitive and adaptive, to meet changing customer requirements, to take account of pandemic impacts, climate change, and to address the impacts of coastal erosion and flooding.</p> <p>The Council's own information (Economic Impact of Tourism in North Norfolk, 2019) (pre-pandemic) shows the importance of overnight visitors to the North Norfolk Economy. In 2019 (pre-pandemic), there was a total of 2,474,000 nights stayed by visitors in North Norfolk, with each overnight visitor spending an average of 4.11 nights in North Norfolk, contributing an average of £237.47 per stay to the local North Norfolk economy. Many of the overnight visitors are accommodated in static and touring caravan and camping parks along the coast. The following statistics demonstrate the importance of caravan and camping sites to North Norfolk:</p> <p>Trips by accommodation:</p> <ul style="list-style-type: none"> • Static caravans: 110,600 18% of total (2nd overall) • Camping 74,400: 12% of total (4th) <p>Nights by accommodation:</p> <ul style="list-style-type: none"> • Static caravans: 578,000 23% of total (1st) • Camping: 330,000 13% of total (3rd) <p>Spend by accommodation type:</p> <ul style="list-style-type: none"> • Static caravans: £26,699,000 19% of total (2nd) • Camping: £24,774,000 17% of total (3rd) <p>Also, more recently, the UK Holiday parks and campsites 2019 Economic Benefit report has been released. The report called 'Pitching the Value' from UK Caravan and Camping Alliance (UKCCA) focuses on the economic impact of the sector. It shows that holiday parks and campsites around the UK generate £9.3 billion in visitor expenditure and support 171,448 full-time employees. The headline national statistics are:</p> <ul style="list-style-type: none"> • Type of accommodation: 76% of visitors had stayed in a touring caravan, motorhome or tent over the course of the year. 16% per cent stayed in a rented or owner-occupied caravan holiday

home, while 5% stayed in a rented or owner-occupied lodge/chalet/cottage.

- Average group size: The average adult group size was 2.4, and 25% of all groups included children. Where parties were travelling with children, the average number of children in each group was 1.8. Thirty-five per cent of groups brought a pet.
- Spending power: Visitors and their party who stayed in rented or touring accommodation spent, on average, £557 per visit (£101 per day), spending, on average, 4.5 days on a holiday park on each holiday. Visitors staying in owned accommodation spent, on average, £480 per visit (£89 per day) and stayed, on average 5.4 days. As a comparison, this is higher than the average daily spend by visitors to the UK at £63 and 3.1 days per holiday.
- Health benefits: Health and wellbeing was improved, with visitors reporting doing more exercise and feeling more relaxed when staying on a holiday park or campsite. This is supported by park operators who provide easy access to a variety of sporting activities or support a range of health and wellbeing activities for their visitors.

If the national averages, particularly in terms of spending are extrapolated to the findings of the Economic Impact of Tourism in North Norfolk, 2019 findings and taking into account the impacts of the Covid 19 pandemic and trend towards 'Staycations', then the importance of caravan and camping parks to the North Norfolk economy are even more evident, with visitors to caravan and camping parks (combined) likely to spend more than visitors in other types of accommodation.

Without a thriving caravan and camping park sector, the North Norfolk economy will be significantly compromised. Overnight visitors need accommodation options, and expectations continue to increase. Those choosing to stay in holiday parks and camping sites generally want up to date modern facilities, many want to be as close to the coast as possible, with easy access to the attractions it offers. The sector needs to respond accordingly, and needs the Council's support to do so.

BSL, considers that the Local Plan is not as positively prepared as it could be, in terms of meeting the needs of tourism businesses in the District. BSL hope that the Council can be more supportive of the holiday park, caravanning and camping sector, through more supportive planning policies and decisions. The emerging Plan as drafted could be far more positive in its support for such businesses. For instance, BSL, suggests that the Council considers acknowledging more explicitly in the Plan's issues section: 'Strengthening the Local Economy,' the particular challenges that coastal erosion has on the district's tourism industry, particularly in terms of tourist accommodation, and the inevitable need to allow the 'roll back' of coastal tourist accommodation sites to areas less affected by erosion.

If the Council is sincere about supporting the continuation of businesses threatened by Coastal Erosion, then the Plan needs to be helpful and proactive in its approach, particularly with regards to environmental enhancement and understand that relocation is in itself a very costly process. The burden of additional costs or restrictions on existing enterprises may realistically make relocation unviable. The Plan should be more positively prepared and effective by being more forthright in the need to encourage and support such tourism businesses.

Modifications requested

Blue Sky Leisure suggests that to ensure the Plan is more positively prepared and effective, the Local Plan Vision should include:

- 1 An additional sentence to reflect the importance of tourism to the North Norfolk Economy along the lines of "... ***North Norfolk's tourism sector will be thriving and support will have been given to help the sector deal with coastal erosion, climate change and pandemics etc. and continue to provide appropriate levels of tourist accommodation and diverse attractions throughout the District to meet the needs of residents and visitors alike.***"
- 2 An additional sentence to reflect the need for the Council to provide support for communities and businesses affected by coastal erosion and flooding over the Plan period along the lines of "... ***Coastal communities and business affected by coastal erosion and flooding will have been supported by positive planning policies and decisions to enable their adaptation and relocation where necessary to become more resilient to coastal change...***"

Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To further discuss Blue Sky Leisure's challenges and the positive support the Local Plan should be providing to tourism accommodation business in North Norfolk in response to climate change, coastal adaptation and the covid 19 pandemic.
Attachment(s)	

2.4 Strategic Aims & Objectives

Consultation Point Title	Strategic Aims & Objectives
Consultation Point Number	2.4
Section of the Plan	2.4.1
ID	LPS79
Response Date	04/03/2022 10:31:16
Name	Mr Paul Timewell
Organisation	Blue Sky Leisure
Agent Name	Mr John Long
Agent Organisation	John Long Planning Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective
Explanation	The draft Plan should be positively prepared and effective by expressly committing to supporting and helping tourism businesses to deal with impacts of climate change, pandemics, including risk from coastal erosion and acknowledging that businesses, such as camping and caravanning business are affected by risk and not just buildings.
Modifications requested	Blue Sky Leisure considers that the Delivering Sustainable Development objective (section 2.4.1), should be expanded to include provisions for the replacement of businesses at risks from coastal erosion and flooding, not just buildings. For instance text along the lines of “... <i>Managing and adapting to the impacts of coastal erosion and flooding by restricting development in areas where it would expose people and property to risks and facilitating the replacement and relocation of buildings and businesses at risk...</i> ” Blue Sky Leisure considers that the Enabling Economic Growth objective (section 2.4.1) should be expanded to express explicit support for tourism businesses and businesses affected by coastal erosions and flooding, along the lines of “... <i>Promoting and supporting economic growth, especially the tourism sector and diversifying and broadening the economic base of the District, enabling inward investment and supporting the growth of existing businesses, including those affected by coastal erosion and flooding</i> ”
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To further discuss Blue Sky Leisure's challenges and the positive support the Local Plan should be providing to tourism accommodation business in North Norfolk in response to climate change, coastal adaptation and the covid 19 pandemic.
Attachment(s)	
Consultation Point Title	Strategic Aims & Objectives
Consultation Point Number	2.4
Section of the Plan	2.4.1
ID	LPS717

Response Date	28/02/2022 08:14:00
Name	Mrs Debbie Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	We welcome objective 2b relating to the historic environment, but suggest changing the word un-designated to non-designated in line with the terminology used in the NPPF.
Modifications requested	Change un-designated to non-designated throughout Plan.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Strategic Aims & Objectives
Consultation Point Number	2.4
Section of the Plan	2.4 Strategic Aims and Objectives
ID	LPS218
Response Date	24/02/2022 12:10:00
Name	Ms Sarah Mitchell
Organisation	RSPB
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively preparedIt is not consistent with national policy
Explanation	The environment is loosely covered in point 2, Protecting Character, however, given the importance of North Norfolk for its nationally and internationally important conservation sites, and the considerable work undertaken by the Council to safeguard these sites; we feel the

	environment should have an objective in its own right. Referring to important initiatives such as Biodiversity Net Gain and Local Nature Recovery Strategies (the latter is only mentioned twice in the Plan) would help link objectives with national policy.
Modifications requested	Suggestions for over-arching environmental aims and objectives could include: 'Recognising the importance of sustainable development and housing to protect and enhance the area's many international and nationally important designated nature conservation sites.' 'Acknowledging the area's natural and heritage assets and ensuring our policies protect and enhance these features.' 'Using the tools available to us, including biodiversity net gain and Local Nature Recovery Network Strategies, we want to protect and enhance our justifiably famous natural and historic environment at the same time as ensuring growth in a sustainable manner.'
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Strategic Aims & Objectives
Consultation Point Number	2.4
Section of the Plan	Chapter 2.4
ID	LPS164
Response Date	22/02/2022 15:55:38
Name	Miss Naomi Chamberlain
Organisation	Norfolk County Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	The County Council supports the sustainable aims and objectives.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Strategic Aims & Objectives
Consultation Point Number	2.4
Section of the Plan	Policy CC 1 Delivering Climate Resilient Sustainable Growth
ID	LPS617
Response Date	07/03/2022 15:06:00

Name	Alicia Hull & Peter Crouch
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	A general comment on the aim of 'sustainable growth'. Growth should no longer be an aim, except in terms of providing services for more people as the population increases. There needs to be great change – but the current stress on continual growth is a large part of the problem.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

3 Delivering Climate Resilient Sustainable Growth

Consultation Point Title	Delivering Climate Resilient Sustainable Growth
Consultation Point Number	3
Section of the Plan	3.0.4
ID	LPS620
Response Date	07/03/2022 15:06:00
Name	Alicia Hull & Peter Crouch
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	'Mitigating climate change through land use planning is about addressing the causes of climate change and can be achieved in a number of ways: • Locating development as near to existing key services and facilities as possible.' Could this be extended into locating new services in developments. Policy HC3 The current aim seems to be to keep existing services in communities where possible. Could NNDC be more ambitious in promoting new local services to cut down the need for transport. Past policies have driven larger units further away. Can planning reverse this trend to encourage many more local shops, local health facilities, smaller primary schools?
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Delivering Climate Resilient Sustainable Growth
Consultation Point Number	3
Section of the Plan	3 Delivering Climate Resilient Sustainable Growth
ID	LPS390
Response Date	07/03/2022 14:32:00
Name	Philip Bacon
Organisation	Europus Ltd
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met?	Yes

* Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective
Explanation	<p>3.3 Sustainable Construction, Energy Efficiency & Carbon Reduction ability</p> <p>3.3a. Housing - the problem:</p> <p>a.1 Housing is a major requirement in the area, substantial numbers of new properties are required and are being planned to suit the whole North Norfolk market over the next 20 years.</p> <p>Sustainability is now vital, it being 'only' important before. The plan does not reflect an important aspect that the houses are still being built by builders and developers, some local, to an unsustainable model with bricks and mortar.</p> <p>Traditionally, builders use almost exclusively, bricks and mortar, creating the typical estates we have become used to. (Some good, Some bad). The process of traditional building is costly, highly inefficient, takes far too long, causes on going site disturbance and is not sustainable.</p> <p>The continent has developed the timber framed housing system to a fine art. A typical continental three-bedroom bungalow, once ordered from the factory (delivery three months), is assembled onto a prepared 'cellar' foundation with power, water and sewerage organised, such that the owner can move in within three weeks with a completed house, rendered with fitted kitchens, wallpapered etc.</p> <p>Timber framed housing in Sweden Norway has survived for centuries due to their knowledgeable and detailed design, managing water and dampness.</p> <p>a.2 The North Norfolk plan does not reflect any detail about changing and improving this aspect and creating the environment for moving from this outdated method of building most homes to something sustainable: Actions could be:</p> <ol style="list-style-type: none"> 1 Encourage architects who understand and can implement such technologies. 2 Encourage Developers who understand the sustainability problem and can react to change their economic models. 3 Encouraging the creation of a factory in Norfolk/North Norfolk that could supply a demand created by a strategic plan. 4 Investigate the 'printing' of houses which is becoming possible and try to set up in North Norfolk. 5 Set up training schemes for young and older people who want to be involved in such a 'new' focus and adventure on creating houses for the future. 6 Set up technical training for solar, private wind turbines, and ground/air source heating to improve the skills of this future employment area. There are too many unskilled people involved at present. 7 Adapt our woodland strategies for growing timber suitable for this timber framed market (as the Continent does). 8 Limit the number of traditionally built properties on a strategic plan. 9 Specify substantial numbers of Timber framed/printed houses. <p>3.3b. Waste Management</p> <p>Waste is a national and a Norfolk major problem. The present 'Recycled' collections and their onward progress are known to dubious and it seems they are often dumped in another country.</p> <p>Raw materials are going to be more valuable in the near future due to the 'Ukraine war' (we will be affected), inflationary pressures and the race/urgent necessity to be more sustainable.</p> <p>The plan should reflect a strategy change:</p> <p>b.1 Local areas should be responsible for the dealing with their own waste. (the main towns)</p> <p>b.2 Waste handling systems should be developed locally (automation is available) to sort waste, into recyclable and non-recyclable elements.</p>

	<p>b3. The recyclable elements should be utilised where possible locally with small company set ups to create added value or generate raw materials.</p> <p>b.4 Energy should be created cleanly from the waste that can't be recycled and supplied to the grid.</p> <p>b.5 Food waste should be collected and sent to existing or new local Anaerobic Digester companies or 'town' units created to fulfil the service (economics of the town approach needs to be evaluated against supply etc). The energy should go to the grid.</p> <p>3.3c Education and Technical Training</p> <p>North Norfolk has no technical training facilities. Technical training in the whole of Norfolk is limited, with not even an Engineering Degree course at UEA. UTCN (BTEC) is a step forward and should assist in providing some skills needed for our society that is moving into to interconnected computer systems, robots and AI. However, the whole of North Norfolk has no technical training facilities, and some 'skilled' people are setting up their self-employed technical businesses after only a six-week course (eg, electricians). The depth of their knowledge and ability to manage the technologies of the future will be limited. Discussions with PV installers on the depth of their knowledge of their associated technologies has been very depressing.</p> <p>Travelling to Norwich or Lowestoft is not easy, being the sole location for training opportunities at present. Apprenticeships are a strong way to train but experienced tutors with superb, modern experience are required for this. It is not obvious that this will be improved by the plan. Continental experience appears to give superior skilled technicians and should be investigated.</p> <p>The NNC high-level plan talks about the major relevance of the tourism and hospitality industries. The Pandemic caused major problems resulting in needed government intervention. It cannot be a suitable plan if that is that is the main industry. There are so many things that need to be manufactured in the UK. It is also considered that there will be future pandemics.</p> <p>The problem of suitable technical training, and other subjects, needs to be addressed by North Norfolk and Norfolk institutions to encourage the setting up of alternative and higher technology businesses, with the knowledge that suitable skills are here to make them successful.</p> <p>Norfolk District Council needs to lead on this for the future of North Norfolk. It is a local problem.</p>
Modifications requested	
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Delivering Climate Resilient Sustainable Growth
Consultation Point Number	3
Section of the Plan	3 Delivering Climate Resilient Sustainable Growth
ID	LPS719
Response Date	28/02/2022 08:14:00
Name	Mrs Debbie Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	
* Yes	
* No	
Has the duty to cooperate been met?	
* Yes	
* No	

Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>Historic England welcomes the Plan's increased emphasis on Climate Change. We recognise the urgent need for positive action and are committed to achieving net zero through supporting actions that address the causes of climate change and that reduce greenhouse gas emissions.</p> <p>Historic England considers these goals to be compatible, as looking after and learning from the historic environment contributes positively to overall global sustainability and can help us adapt to and mitigate for climate change.</p> <p>Further details of Historic England's position on Climate Change and sustainability can be found via the following link: https://historicengland.org.uk/news/press-statement-on-climate-change-and-sustainability</p>
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Delivering Climate Resilient Sustainable Growth
Consultation Point Number	3
Section of the Plan	3 Delivering Climate Resilient Sustainable Growth
ID	LPS787
Response Date	28/02/2022 14:38:00
Name	Mr Darl Sweetland
Organisation	Anglian Water
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	SUPPORT: Anglian Water supports the mitigation and adapting approaches at 3.0.4 and 3.0.5 and specifically reducing water consumption which in turn reduces the amount of wastewater requiring management, pumping/transport, and treatment.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	

Attachment(s)	
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Policy CC 1 Delivering Climate Resilient Sustainable Growth

Consultation Point Title	Delivering Climate Resilient Sustainable Growth
Consultation Point Number	Policy CC 1
Section of the Plan	Policy CC 1 Delivering Climate Resilient Sustainable Growth
ID	LPS42
Response Date	17/02/2022 13:11:46
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	Point 2, proposals that accord with policies in the Plan....will be approved without delay unless there are material considerations..' Does this allow for public consultation?
Modifications requested	Point 2, 'Proposals that accord with policies in the Plan....will be approved after public consultation if no material considerations are raised' i.e add proposals that accord with the plan... <u>must be subject to public consultation</u>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Delivering Climate Resilient Sustainable Growth
Consultation Point Number	Policy CC 1
Section of the Plan	Policy CC 1 Delivering Climate Resilient Sustainable Growth
ID	LPS95
Response Date	18/02/2022 11:53:00
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound?	No

* Yes	
* No	
Reason(s) not Sound	
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	Point 2, proposal that accord with the plan will be approved without delay unless material considerations dictate otherwise - where does public consultation come in?
Modifications requested	Proposals must be subject to public consultation.
Appear at examination hearing session(s)?	No, I do not wish to participate in examination hearing session(s)
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Delivering Climate Resilient Sustainable Growth
Consultation Point Number	Policy CC 1
Section of the Plan	Policy CC 1 Delivering Climate Resilient Sustainable Growth
ID	LPS193
Response Date	23/02/2022 19:02:14
Name	Miss Donna Clarke
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	Yes
* Yes	
* No	
Has the duty to cooperate been met?	Yes
* Yes	
* No	
Do you consider the plan to be Sound?	No
* Yes	
* No	
Reason(s) not Sound	It is not consistent with national policy
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	Should be consistent with emerging national policy on biodiversity.
Modifications requested	The biodiversity enhancement should be a minimum 10% as set out in the Environment Bill.
Appear at examination hearing session(s)?	No, I do not wish to participate in examination hearing session(s)
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Delivering Climate Resilient Sustainable Growth
Consultation Point Number	Policy CC 1
Section of the Plan	Policy CC 1 Delivering Climate Resilient Sustainable Growth
ID	LPS201
Response Date	23/02/2022 22:38:31
Name	Mrs Gemma

	Harrison
Organisation	Cley Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Cley Parish Council support this policy apart from point 3 which Cllrs felt placed too much presumption to development.
Modifications requested	Cllrs would like to see point 3 amended to remove the presumption of development. Therefore point 3 could state where no relevant policies exist the NPPF will be relied upon. Rather than planning will be granted unless...
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Delivering Climate Resilient Sustainable Growth
Consultation Point Number	Policy CC 1
Section of the Plan	Policy CC 1 Delivering Climate Resilient Sustainable Growth
ID	LPS417
Response Date	07/03/2022 18:23:06
Name	
Organisation	Richborough Estates
Agent Name	Mrs Raj Bains
Agent Organisation	Boyer Planning
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	No
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	Please refer to full statement of representations (see LPS263) on behalf of our client. Policy CC 1 requires development proposals to address a number of principles to ensure that development positively contributes towards

	<p>mitigating and adapting to climate change and that proposals deliver resilient sustainable growth within the District.</p> <p>These representations support that North Walsham is a suitable and sustainable location and has potential to facilitate growth and development. Compared to other parts of the District, North Walsham is relatively unconstrained from environmental constraints such as ecological and landscape designations and therefore provides opportunities for significant housing and economic growth over the plan period.</p> <p>For the reasons set out above, we would suggest that further sites are allocated within the emerging plan to support additional housing growth in the short term in North Walsham.</p> <p>Additional sites, including Land at Paston Gateway, would be suitably located in proximity to town centre uses. Further information on the locational sustainability of the site can be found in Section 8 of the attached representations. The allocation of the site would support the principles of Policy CC1 including criterion C: 'Focusing larger scale development into areas where services will be available, where facilities can be supported, and where new development facilitates a step change towards choices in sustainable modes of transport through careful design and balanced mix of uses that supports walking and cycling as well as public transport and encourages a choice of sustainable travel modes.'</p>
Modifications requested	To support Policy CC1, we would suggest that further sites such as Land at Paston Gateway, are allocated within the emerging plan to support additional housing growth in the short term in North Walsham.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	Our representations provide fundamental concerns about the proposed policies contained in the Local Plan. It is critical the Inspector hears our views on why we think the Plan is unsound and will fail to meet local housing needs of North Norfolk. Ultimately, our views could help assist the Council in ensuring there is an adequate supply of new housing across the District and throughout the short term, medium and long term period of the Local Plan.
Attachment(s)	
Consultation Point Title	Delivering Climate Resilient Sustainable Growth
Consultation Point Number	Policy CC 1
Section of the Plan	Policy CC 1 Delivering Climate Resilient Sustainable Growth
ID	LPS614
Response Date	07/03/2022 09:36:00
Name	Cllr Nigel Dixon
Organisation	Ward Member for Hoveton & Tunstead (NNDC)
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	

Explanation	In terms of the environment conservation and climate change agenda objectives it's unsound in that it fails to conserve sufficient of the rural and natural environment, outside of AONBs and other designated protected sites, to address the loss of natural habitat and biodiversity nor does it set sufficient energy and resource use efficiency standards to meet the 2030 or 2050 climate change objectives.
Modifications requested	The Plan needs to be modified to protect existing natural habitat and migration corridors and integrate new habitat and greater biodiversity gain opportunities into the majority of the proposed sites. It also needs to set higher standards in terms of heat insulation, use of renewables, rain-water capture and use and overall water cycle efficiency. It's acknowledged that huge efforts have been made to comply with the complex and onerous demands of central government while trying to protect the special character of North Norfolk and meet the rapidly rising need to conserve and rebuild biodiversity as well as the climate change agenda. The above, proportionate and complementary, modifications are sought to fill obvious gaps and redress imbalances at both strategic and local grass roots levels to ensure the Local Plan is sound and fit for purpose over the next 15+ years. If it's not possible to incorporate these modifications, then please treat these representations as objections.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Delivering Climate Resilient Sustainable Growth
Consultation Point Number	Policy CC 1
Section of the Plan	Policy CC 1 Delivering Climate Resilient Sustainable Growth
ID	LPS720
Response Date	28/02/2022 08:14:00
Name	Mrs Debbie Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	We broadly welcome this policy and particularly welcome the reference at criterion h for conserving and enhancing the historic environment and landscape character.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Consultation Point Title	Delivering Climate Resilient Sustainable Growth
Consultation Point Number	Policy CC 1
Section of the Plan	Policy CC 1 Delivering Climate Resilient Sustainable Growth
ID	LPS788
Response Date	28/02/2022 14:38:00
Name	Mr Darl Sweetland
Organisation	Anglian Water
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	SUPPORT: Anglian Water supports the approaches in Policy CC1 to maximise (use efficiently?) low carbon infrastructure, the efficient use of land and resources and net gain in biodiversity.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Delivering Climate Resilient Sustainable Growth
Consultation Point Number	Policy CC 1
Section of the Plan	Policy CC 1 Delivering Climate Resilient Sustainable Growth
ID	LPS661
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified	

* It is not consistent with national policy	
Explanation	<p>Natural England welcomes the council's commitment to futureproof development against the challenges of climate change and the use of the National Planning Policy Framework (NPPF) to determine permission.</p> <p>We take this opportunity to highlight nature-based solutions in response to climate change, such as natural capital, biodiversity net gain and green infrastructure. The natural environment's resilience to change, such as ecological networks, plays an important role in aiding climate change adaptation and should therefore be protected. There is strategic basis for how the natural environment can be integrated with and deliver wider objectives such as long-term flood risk reduction, boosts to wildlife, improvements to water and air quality, and opportunities for biodiversity net gain.</p> <p>We recommend consideration of Government's Natural capital tool launched to help protect the environment (https://www.gov.uk/government/news/natural-capital-launched-to-help-protect-the-environment) which is a new online resource for measuring natural capital designed to aid decision making in order to boost and protect natural capital, and Enabling a Natural Capital Approach (ENCA) (https://www.gov.uk/guidance/enabling-a-natural-capital-approach-enca) which provides guidance for policy and decision makers to help them consider the value of a natural capital approach.</p>
Modifications requested	We advise that natural capital is cross referenced in Policy CC11 due to its relevance to green infrastructure.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

3.2 Renewable & Low Carbon Energy

Consultation Point Title	Renewable & Low Carbon Energy
Consultation Point Number	3.2
Section of the Plan	3.2.6, 3.2.11 and Figure 5
ID	LPS40
Response Date	24/02/2022 12:08:00
Name	Ms Sarah Mitchell
Organisation	RSPB
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not consistent with national policy
Explanation	Paragraph 3.2.6 refers to 'high sensitivity landscapes, such as the AONB, Heritage Coast and Undeveloped Coast', but omits to include other nationally and internationally important conservation designations (SSSI, SPA, SAC and Ramsar). Figure 5, Wind Energy Areas, page 31 - would be easier to follow if settlements are shown in different colours, as used in figure 6. Paragraph 3.2.11. Wording to protect the environment could be stronger with link to environmental assessments.
Modifications requested	Paragraph 3.2.6. Policy CC2 does include nationally and internationally important sites, so including nationally and internationally important sites (SSSI, SPA, SAC and Ramsar) in 3.2.6 would aid completeness and consistency. Figure 5, Wind Energy Areas, page 31 - would be easier to follow if settlements are shown in different colours, as used in figure 6. Paragraph 3.2.11. Suggest amending wording of final sentence to state 'it is not of high environmental value and adverse impacts on biodiversity can be ruled out. '
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Renewable & Low Carbon Energy
Consultation Point Number	3.2
Section of the Plan	3.2 Renewable & Low Carbon Energy
ID	LPS334
Response Date	04/03/2022 14:26:01
Name	Miss Natalie Beal
Organisation	Broads Authority
Agent Name	

Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Comments <p>The Fig. 5 blue areas show 'small to medium scale' wind development up to the BA boundaries. (It would be helpful if it showed the BA boundary on the key.)</p> <p>Small to medium is defined as 30-60m in NNDC Landscape Sensitivity Assessment 2021 SPD (LSA SPD): North Norfolk Landscape Sensitivity Assessment (north-norfolk.gov.uk). In BA Landscape Sensitivity Study (BALSS) Small to medium is defined as 0-50m high, so the NNDC policy could theoretically allow 60m high turbines close to the BA boundary, which would be a concern. BALSS Figure 4.3: Wind Turbine Sensitivity; Medium Turbines (20 - 50m) shows all but 2 Landscape Character Areas (LCAs) (on Norwich fringe) as having High sensitivity. Fig 4.4 Wind Turbine Sensitivity; Large Turbines (50 - 70m) shows all LCAs as having High sensitivity.</p> <p>Paragraph 3.2.5 refers to the North Norfolk Landscape Sensitivity Assessment SPD. Figure 5.3 of that SPD: Sensitivity to small scale wind turbines – shows many areas in NN along Broads boundary as only 'moderate' sensitivity. This doesn't seem to acknowledge the setting of the Broads as a consideration.</p> <p>Paragraph 3.2.6 – this para needs to include reference to the Broads. Please can you amend this part so it refers to the Broads, like other important highly sensitive landscapes in the area?</p> <p>Para. 3.2.9 <i>Wind energy development proposals will be supported in principle where it can be demonstrated that the landscape sensitivity for the proposed scale of turbine does not exceed 'Moderate - High'</i>. Looking at some of the relevant BA landscape sensitivity studies, e.g. for Landscape Character Area (LCA) 27: Ant Valley upstream of Wayford Bridge, LCA 28: Ant Valley downstream of Wayford Bridge, and LCA 30: Upper Thurne Open Marsh, Broads and Fens, there is generally a high overall landscape sensitivity to wind turbine development in these areas. The intervisibility with adjacent areas in North Norfolk means that larger turbines could appear more dominant in relation to the Broads, resulting in high landscape sensitivity. So, NNDC's <i>Moderate - High</i> would seem to allow wind turbine developments which could affect the high landscape sensitivities of adjacent Broads LCAs.</p> <p>Para 3.2.9 allows for 80m hub/130m tip wind turbines at Coltishall. This is a significant height and raises concern re visibility from Broads areas. The centre of the airfield is on upland about 3km from the nearest Broads boundary at Coltishall. Figure 3.2 of Broads Landscape Sensitivity Study shows a Zone of Theoretical Visibility for Coltishall airfield, with a turbine height of 50m. The map shows how such development would be theoretically visible from large areas of the northern Broads.</p> <p>Policy CC2, para 1 seems to be a very sweeping statement of support for everything, without any other considerations. For example, impacts on landscape character and the setting of the Broads are not included in this part of the policy. There will probably be other policies in the Local Plan that schemes would also need to address. As written, this seems very permissive with no criteria to consider. Para 2 is more like what one would expect – setting out various criteria to consider and it mentions 'nationally important landscapes'. It is therefore not clear what para 1 actually means? Is it needed considering para 2?</p> <p>Overall the boundary of the blue area for the policy is somewhat concerning. I'm not sure that NNDC have fully appreciated the potential adverse impacts of turbines on the Broads and their setting in particular. If NNDC looked at their LCAs together along with the BA</p>

	<p>LCAs, it would seem to suggest either pulling the blue area away from the Broads boundary or introducing a 'buffer zone' along the Broads/NNDC boundary where perhaps a different more stringent policy approach could be applied.</p> <p>Relevant part of NPPF The Broads and the setting of the Broads is protected at NPPF paragraph 176.</p>
Modifications requested	<p>Proposed changes Figure 5 needs to show the BA boundary.</p> <p>Figure 5 given all the above, it is suggested to either pull the blue area away from the Broads boundary or introducing a 'buffer zone' along the Broads/NNDC boundary where perhaps a different more stringent policy approach could be applied.</p> <p>Para 3.2.6 'Careful consideration will also be needed in areas close to high sensitivity landscapes, such as the AONB, the Broads, Heritage Coast and Undeveloped Coast and the cumulative impacts of an increasing number of renewable developments within an area.'</p> <p>Policy CC2, 1: remove para 1 or combine with para 2.</p> <p>Policy CC2, 2, b: <i>the special qualities and character of all designated nationally important landscapes and heritage assets including their settings</i></p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Renewable & Low Carbon Energy
Consultation Point Number	3.2
Section of the Plan	CC2 Renewable & Low Carbon Energy
ID	LPS148
Response Date	22/02/2022 11:58:15
Name	Mr Michael Rayner
Organisation	CPRE Norfolk
Agent Name	
Agent Organisation	
<p>Do you consider the plan to be Legally Compliant? * Yes * No</p>	Yes
<p>Has the duty to cooperate been met? * Yes * No</p>	Yes
<p>Do you consider the plan to be Sound? * Yes * No</p>	No
<p>Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy</p>	It is not consistent with national policy
Explanation	<p>We are pleased to see that supporting text in 3.2.11 highlights the PPG which "encourages the effective use of land by focusing large scale solar farms on previously developed and non-agricultural land, provided that it is not of high environmental value". It would be helpful to include further detail from the NPPF on this topic, particularly with regard to the Best and Most Versatile (BMV) agricultural land. Here, footnote 58 of the NPPF states that "where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality". Paragraph 174b also recognizes the "intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services, including the economic and other benefits of the best and</p>

	<p>most versatile agricultural land”, with planning policies and decisions expected to contribute to and enhance the local environment. The government’s Guide to assessing development proposals on agricultural land is clear about the need to protect BMV land from significant, inappropriate or unsuitable development proposals.</p> <p>CPRE Norfolk suggests that this is reflected in Policy CC 2, by having a point or clause which specifically prevents solar farms from being permitted on BMV.</p> <p>In addition, CPRE Norfolk suggests, in relation to onshore wind turbines, that to follow NPPF footnote 54 fully, the following phrase should be added at the end of Policy point 3: ‘and the proposal has their backing’. The full amended policy point 3 would then read:</p> <p>‘The location of all planning proposals for wind turbines will be informed by Figure 5 - Wind Energy Areas, which details the suitable areas for such development and, following consultation, must demonstrate that the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing.’</p>
<p>Modifications requested</p>	<p>CPRE Norfolk suggests to make this policy fully compliant with the NPPF as outlined in our response to Q5 and therefore sound, that this is reflected in Policy CC 2, by having a point or clause which specifically prevents solar farms from being permitted on BMV.</p> <p>In addition, CPRE Norfolk suggests, in relation to onshore wind turbines, that to follow NPPF footnote 54 fully, the following phrase should be added at the end of Policy point 3: ‘and the proposal has their backing’. The full amended policy point 3 would then read:</p> <p><i>‘The location of all planning proposals for wind turbines will be informed by Figure 5 - Wind Energy Areas, which details the suitable areas for such development and, following consultation, must demonstrate that the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing.’</i></p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	<p>No, I do not wish to participate in examination hearing session(s)</p>
<p>Justification for appearing at hearing</p>	
<p>Attachment(s)</p>	

Consultation Point Title	Renewable & Low Carbon Energy
Consultation Point Number	Policy CC 2
Section of the Plan	CC2
ID	LPS125
Response Date	21/02/2022 14:56:25
Name	Mrs Gemma Harrison
Organisation	Holt Town Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Whilst Holt Town Cllrs are supportive of wind farms and renewable energy, concerns were raised with the rules being relaxed to allow wind turbines in areas which do not exceed moderate-high sensitivity. Cllrs felt even low sensitivity areas needed careful consideration.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Renewable & Low Carbon Energy
Consultation Point Number	Policy CC 2
Section of the Plan	Policy CC 2 Renewable & Low Carbon Energy
ID	LPS43
Response Date	17/02/2022 18:32:21
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No

Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	Point 2- 'proposals to install renewable technology will be supported if the area does not exceed moderate -high sensitivity.' This is potentially damaging to the landscape and technology shd not be installed in a sensitive landscape.
Modifications requested	'proposals to install renewable technology will be supported if the landscape is undesignated and not sensitive'.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Renewable & Low Carbon Energy
Consultation Point Number	Policy CC 2
Section of the Plan	Policy CC 2 Renewable & Low Carbon Energy
ID	LPS194
Response Date	23/02/2022 18:24:53
Name	Miss Donna Clarke
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not consistent with national policy
Explanation	Fails to reflect emerging national energy policy.
Modifications requested	The Plan should be consistent with the emerging national energy policy with respect to renewable energy and the issues to be considered. Note the emerging policy says that where the local plan is silent the fallback is national energy policy.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Renewable & Low Carbon Energy
Consultation Point Number	Policy CC 2
Section of the Plan	Policy CC 2 Renewable & Low Carbon Energy
ID	LPS202
Response Date	23/02/2022 22:45:19

Name	Mrs Gemma Harrison
Organisation	Cley Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Cley Cllrs are concerned that this policy could encourage more wind farms in areas of low to moderate sensitivity and therefore request that this part of the policy is removed. Wind farms should all be assessed on a case by case basis taking into the account the damage to the landscape.
Modifications requested	Amend policy to ensure all applications are dealt with on a case by case basis.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Renewable & Low Carbon Energy
Consultation Point Number	Policy CC 2
Section of the Plan	Policy CC2 Renewable & Low Carbon Energy
ID	LPS499
Response Date	07/03/2022 19:39:41
Name	Mr Mike Jones
Organisation	Norfolk Wildlife Trust
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	SEE ATTACHED FILE

	<p>Evidence is clear that the effects of climate change on Norfolk's wildlife will be significant, in addition to the pressures it already faces from habitat loss, fragmentation, disturbance and invasive species. A paper in the Transactions of the Norfolk & Norwich Naturalists Society (<i>The potential impacts of climate change on the biodiversity of Norfolk</i>, J. Price, 2017, 50(1)) highlighted the many species likely to be lost from Norfolk in response to a 2 degree temperature rise, and the most recent IPCC reporting highlights further how the climate and biodiversity crises are inextricably linked. Therefore, to avoid committing Norfolk to further unnecessary wildlife losses, and to safeguard natural areas critical to the storage and sequestration of carbon in the future, we strongly recommend that the plan takes every opportunity possible to help reach national carbon neutrality goals as soon as possible, locking in gains for climate change mitigation and adaptation in all new development.</p> <p>The stated purpose of this policy is to help increase the use and supply of renewable and low carbon energy, but we remain concerned that the wording of the policy leaves it possible for development to occur under the plan without making any positive contribution to the use and supply of renewable and low carbon energy. The majority of the policy text (sections 2 and 3) relate to restrictions on the conditions by which renewable energy development will be restricted. Section 1 states that renewable energy proposals will be supported, but this makes no requirement on any development to include renewable energy infrastructure and so without modification it is feasible that the policy will not help delivery increased renewable energy capacity in the district over the plan period. We recommend that the policy is modified to include targets for renewable energy provision in all new development (for example, for a percentage gain as per the Merton rule), either on-site or via a collective off-site aggregation of delivery.</p>
Modifications requested	<p>SEE ATTACHED FILE</p> <p>We recommend that the policy is modified to include targets for renewable energy provision in all new development (for example, for a percentage gain as per the Merton rule), either on-site or via a collective off-site aggregation of delivery.</p>
<p>Appear at examination hearing session(s)?</p> <p>* No, I do not wish to participate in examination hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	NNNS_Transactions_2017_Norfolk_Biodiversity_Climate_Change_Jeff_Price.pdf
Consultation Point Title	Renewable & Low Carbon Energy
Consultation Point Number	Policy CC 2
Section of the Plan	Policy CC 2 Renewable & Low Carbon Energy
ID	LPS662
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
<p>Do you consider the plan to be Legally Compliant?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Has the duty to cooperate been met?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Do you consider the plan to be Sound?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Reason(s) not Sound</p> <p>* It is not positively prepared</p> <p>* It is not effective</p> <p>* It is not justified</p> <p>* It is not consistent with national policy</p>	

Explanation	We support the need to demonstrate no likely significant effects on the qualifying features of designated sites. We would recommend a project level Habitats Regulations Assessment (HRA) where a proposal is likely to constitute a significant effect, both within the boundary of the designated site, and any land that may be functionally linked. A landscape and visual impact assessment may also be required where a proposal is situated in or within proximity to the Norfolk Coast Area of Outstanding Natural Beauty (AONB) to ensure that any impacts to the special qualities of this protect landscape are fully assessed. Marine Conservation Zones should be evaluated where necessary. We strongly advise that projects likely to negatively impact the Cromer Shoal MCZ are avoided.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Renewable & Low Carbon Energy
Consultation Point Number	Policy CC 2
Section of the Plan	Policy CC 2 Renewable & Low Carbon Energy
ID	LPS721
Response Date	28/02/2022 08:14:00
Name	Mrs Debbie Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>We understand that the North Norfolk Landscape Sensitivity Assessment (LSA) SPD has been used to inform this policy. Whilst the SPD is a helpful starting point, by its own admission it gives no consideration to specific cultural heritage/archaeological issues associated with individual designated heritage assets and their settings (see para 1.20 f LSA).</p> <p>We refer you to Historic England Advice Note 15 (February 2021) for further information on commercial scale renewable energy development:</p> <p>https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/92012/15-02-2021-Advice-Note-15-Commercial-scale-renewable-energy-development.pdf</p> <p>Para 155 of the NPPF advises LPAs to consider identifying suitable areas for renewable and low carbon energy sources in their plans and strategies. Our advice note includes advice on an appropriate methodology for identifying such areas in Plan making (see paras 23-27; i.e. all heritage assets in the area should be identified, arbitrary distance measurements should be avoided, and the setting of heritage assets should also be included as a consideration).</p> <p>As we understand it, a consideration of heritage assets and their settings has not been included in the LSA and subsequent development of Figure 5 (Wind Energy Areas map) in the Local Plan.</p>

Therefore it is our view that the evidence base to support the identification of areas suitable for such development is incomplete.

Renewable energy policies should include reference to heritage assets and their settings (in conjunction with Local Plan heritage policies) and should seek to ensure that any harm to the significance of a heritage asset is satisfactorily addressed in the planning balance.

We therefore acknowledge and welcome the reference to heritage assets and their settings in policy CC2, 2b

Notwithstanding this we still have concerns regarding the wind energy map for the following reasons.

The approach taken towards identifying potential areas for wind energy developments is not based upon sufficiently robust evidence. Indeed, the areas which have been identified as being suitable for such developments may result in harm to a number of North Norfolk's most important designated heritage assets and hence render the policy incompatible with the NPPF's core principles of sustainable development and specifically paragraph 190.

The approach for impact on designations to be decided within the planning process, is not sufficient. Significance of heritage assets gained from their setting is derived from the complex relationships between site, topography, landscape and other assets, as explored within the Planning Practice Guidance and Historic Environment Good Practice Advice Note 3: The Setting of Heritage Assets.

Paragraph 007 of the Planning Practice Guidance for Renewable and low carbon energy, states that "great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting;" The approach proposed does not reflect this.

Consequently, it is considered that the approach of Policy CC2 and the wind energy maps is unsound for the following reasons:-

(1) The identification of specific areas as being suitable for wind energy development is not based upon a sufficiently robust evidence base – in particular there has been no consideration of heritage assets and their settings.

(2) The areas which have been identified for wind energy development could lead to pressure for such developments in locations which would be likely to result in harm to a number of North Norfolk's most important designated heritage assets. Consequently, the approach to the identification of specific areas as being suitable for wind turbine developments does not demonstrate that the plan is setting out a "positive strategy for the conservation of the historic environment" as is required in the NPPF.

(3) A receptor buffering approach is neither appropriate nor sufficient to assess impact upon the significance of heritage assets since it fails to engage with their historic landscape, designed landscape, topographic or archaeological context.

Modifications requested	<p>Ideally, include a consideration of heritage assets and their setting in development of Wind Energy Map (Figure 5) and amend figure accordingly.</p> <p>Or if that isn't possible in the timeframe delete figure 5 and provide greater reference to heritage assets and settings in the policy and supporting text.</p> <p>If the map remains, we would expect additional text on the map to make it clear that detailed assessment has not been undertaken in relation to heritage assets and their settings with corresponding supporting text in the Plan (see policy CC1, Supporting Text and Policies Map of North West Leicestershire Local Plan where this has been done).</p>
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Renewable & Low Carbon Energy
Consultation Point Number	Policy CC 2
Section of the Plan	Policy CC 2 Renewable & Low Carbon Energy
ID	LPS789

Response Date	28/02/2022 14:38:00
Name	Mr Darl Sweetland
Organisation	Anglian Water
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	CLARIFICATION: Whilst the support for renewable energy is welcome (3.2.1 to 3.2.9 and 3.2.11 to 3.2.15) it is not clear if low carbon energy projects at existing developed infrastructure sites, such as wastewater recycling centres would be considered sustainable development (Policy CC2) with a higher level of policy support? Development of renewable energy infrastructure at these sites also increases their resilience to local and wider impact of climate change which the plan observes will become more severe and frequent.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Renewable & Low Carbon Energy
Consultation Point Number	Policy CC 2
Section of the Plan	Policy CC 2 Renewable & Low Carbon Energy
ID	LPS619
Response Date	07/03/2022 15:06:00
Name	Alicia Hull & Peter Crouch
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	

<p>Explanation</p>	<p>Policy CC2 3.2.9 “Wind energy development proposals will be supported in principle where it can be demonstrated that the landscape sensitivity for the proposed scale of turbine does not exceed ‘Moderate - High’. This sensitivity classification maintains opportunities for wind energy development of up to 60m hub/100m tip height across the least sensitive parts of the District.”</p> <p>This very unambitious policy supported by the North Norfolk Landscape Sensitivity Assessment seems more in tune with the endemic hostility in the council to wind turbines than your declared aim of combating climate change. The Assessment sounds like a knee jerk reaction to the wind turbine proposals which finally were passed. Indeed being over sensitive to supposed opposition to turbines risks losing more of our precious land to coastal erosion. That should be weighed in the balance.</p> <p>Ruling out the AONB is quite unnecessary and will stop many helpful projects when we so desperately need them. From our experience of following two local proposals and trying to get a community turbine installed at North Walsham. We know that in areas of sensitivity, because of all the small fields, trees and hedges, turbines are much harder to see. They do not impinge on the landscape. When you add to this that they are temporary structures, the hostility becomes absurd. It is also not shared by a significant proportion of the residents – many of whom showed their support for the community project in North Walsham by investing in it even when they knew they might lose their money.</p> <p>Critically, it conflicts directly with your stated ambition to make ‘the fullest contribution towards minimising greenhouse gas emissions’. On shore wind along with offshore wind is listed in Drawdown as the best way to combat carbon. It is in the National Grid’s proposals to combat climate change along with local grids to boost resilience. (Catherine Rowett’s Report Energising the East’) On shore wind is the quickest to install and does the least harm. We need to cut carbon asap. If after 25 years, people don’t like them, and other benign renewable means of energy production have been developed, they can be removed. But this must be the choice of residents not a biased council.</p> <p>Given North Norfolk’s history of windmills, we know this is a good site. NNDC should encourage turbines, especially community owned ones which will add to the local economy. They should campaign for easier planning restrictions and consider investing in community turbines themselves. The wind industry could be developed to bring local jobs.</p>
<p>Modifications requested</p>	
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	
<p>Justification for appearing at hearing</p>	
<p>Attachment(s)</p>	

Policy CC 3 Sustainable Construction, Energy Efficiency & Carbon Reduction

Consultation Point Title	Sustainable Construction, Energy Efficiency & Carbon Reduction
Consultation Point Number	Policy CC 3
Section of the Plan	Policy CC 3 Sustainable Construction, Energy Efficiency & Carbon Reduction
ID	LPS398
Response Date	07/03/2022 15:14:31
Name	Mr Will Wright
Organisation	ESCO Developments, Flagship Housing Group & Lovell Partnerships
Agent Name	Sarah Hornbrook
Agent Organisation	Bidwells LLP
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	<p>The Consortium supports the objective of this policy to set higher standards of environmental sustainability in new development proposals. Though the requirement for development to achieve reductions in CO2 emissions of a minimum 31% below the Target Emission Rate of Part L Building Regulations should be reconsidered. While it is appreciated that the 31% reduction rate referenced in the policy has been implemented to accommodate the emerging Future Homes Standard (FHS), there is no guarantee that this reduction rate will come into force as part of the FHS in due course. Furthermore, there is no evidence within the Local Plan Evidence Base to justify the inclusion of this reduction rate, or analysis to understand whether it is deliverable in practice, casting doubt over the soundness of the policy given conflict with Paragraphs 35(b) of the NPPF.</p> <p>By way of comparison, the emerging Greater Norwich Local Plan, which captures neighbouring local authorities (Broadland, South Norfolk, and Norwich City), includes an emerging policy which requires new development to achieve reductions in CO2 emissions of a minimum of 19% below Part L (Policy 2). This is considered to form a more realistic target for new development in North Norfolk, so the Consortium suggests that Policy CC3 is amended accordingly.</p>
Modifications requested	Revise Policy CC3 to reduce the required reduction in CO2 emissions to a level that is justified by evidence, and demonstrated to be deliverable in practice.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	I reserve the right to appear prior to publication of the draft agendas that will set out the Inspector's matters and questions to form the basis of the discussions at the Hearings. The intention to appear is to seek to ensure that the Policy can be made sound.
Attachment(s)	
Consultation Point Title	Sustainable Construction, Energy Efficiency & Carbon Reduction
Consultation Point Number	Policy CC 3

Section of the Plan	Policy CC 3 Sustainable Construction, Energy Efficiency & Carbon Reduction
ID	LPS353
Response Date	04/03/2022 15:32:00
Name	
Organisation	Norfolk Homes Ltd
Agent Name	Mr Alan Presslee
Agent Organisation	Cornerstone Planning Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified; It is not consistent with national policy
Explanation	<p>Policy CC3: Part 2 of Policy CC3 is superfluous. Its provisions seek to duplicate what is required of housebuilders under the Building Regulations, and so this part of the policy appears unnecessary.</p> <p>As it stands, Policy CCE3 is unsound as it neither justified, nor consistent with national policy</p>
Modifications requested	As above
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To explain/elaborate
Attachment(s)	
Consultation Point Title	Sustainable Construction, Energy Efficiency & Carbon Reduction
Consultation Point Number	Policy CC 3
Section of the Plan	Policy CC 3 Sustainable Construction, Energy Efficiency & Carbon Reduction
ID	LPS428
Response Date	07/03/2022 14:30:01
Name	
Organisation	Hopkins Homes
Agent Name	Mr Jake Lambert
Agent Organisation	Bidwells
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound	It is not effective; It is not justified

<ul style="list-style-type: none"> * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy 	
Explanation	<p><u>This policy is unsound as it has not been justified</u></p> <p>Hopkins Homes supports the objective of this policy to set higher standards of environmental sustainability in new development proposals. Though the requirement for development to achieve reductions in CO2 emissions of a minimum 31% below the Target Emission Rate of Part L Building Regulations should be reconsidered. While it is appreciated that the 31% reduction rate referenced in the policy has been implemented to accommodate the emerging Future Homes Standard, there is no guarantee that this reduction rate will come into force as part of the FHS in due course. Furthermore, there is no evidence within the Local Plan Evidence Base to justify the inclusion of this reduction rate, or analysis to understand whether it is deliverable in practice, casting doubt over the soundness of the policy given conflict with Paragraphs 35(b) of the NPPF.</p>
Modifications requested	<p>By way of comparison, the emerging Greater Norwich Local Plan, which captures neighbouring local authorities (Broadland, South Norfolk, and Norwich City), includes an emerging policy which requires new development to achieve reductions in CO2 emissions of a minimum of 19% below Part L (Policy 2). This is considered to form a more realistic target for new development in North Norfolk, so Hopkins Homes Ltd wishes to suggest that Policy CC3 is amended accordingly.</p>
Appear at examination hearing session(s)? <ul style="list-style-type: none"> * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s) 	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Sustainable Construction, Energy Efficiency & Carbon Reduction
Consultation Point Number	Policy CC 3
Section of the Plan	Policy CC 3 Sustainable Construction, Energy Efficiency & Carbon Reduction
ID	LPS501
Response Date	07/03/2022 20:14:39
Name	Mr Mike Jones
Organisation	Norfolk Wildlife Trust
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? <ul style="list-style-type: none"> * Yes * No 	
Has the duty to cooperate been met? <ul style="list-style-type: none"> * Yes * No 	
Do you consider the plan to be Sound? <ul style="list-style-type: none"> * Yes * No 	No
Reason(s) not Sound <ul style="list-style-type: none"> * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy 	It is not effective
Explanation	<p>Evidence is clear that the effects of climate change on Norfolk's wildlife will be significant, in addition to the pressures it already faces from habitat loss, fragmentation, disturbance and invasive species. A paper in the Transactions of the Norfolk & Norwich Naturalists Society (<i>The potential impacts of climate change on the biodiversity of Norfolk</i>, J. Price, 2017, 50(1)) highlighted the many species likely to be lost from Norfolk in response to a 2 degree temperature rise, and the most</p>

	<p>recent IPCC reporting highlights further how the climate and biodiversity crises are inextricably linked. Therefore, to avoid committing Norfolk to further unnecessary wildlife losses, and to safeguard natural areas critical to the storage and sequestration of carbon in the future, we strongly recommend that the plan takes every opportunity possible to help reach national carbon neutrality goals as soon as possible, locking in gains for climate change mitigation and adaptation in all new development.</p> <p>The stated purpose of this policy is to promote a proactive strategy to mitigate and adapt to climate change through moving towards a low carbon future in building construction. We support the inclusion of actual targets in this policy, but recognising the benefits to the climate and Norfolk's wildlife from taking action as early as possible, and the additional impacts that will undoubtedly accrue if action is deferred, we strongly recommend that zero carbon policy targets are adopted for new built development as soon as possible. We are encouraged by the positive example set by Reading Borough Council in policy H5 of their adopted Local Plan, and cite it as an example of positive planning policy that is replicable here. We therefore strongly recommend that the policy is upgraded to a more ambitious zero carbon targets, with consequent benefits for climate change targets and therefore also Norfolk's wildlife.</p>
Modifications requested	The stated purpose of this policy is to promote a proactive strategy to mitigate and adapt to climate change through moving towards a low carbon future in building construction. We support the inclusion of actual targets in this policy, but recognising the benefits to the climate and Norfolk's wildlife from taking action as early as possible, and the additional impacts that will undoubtedly accrue if action is deferred, we strongly recommend that zero carbon policy targets are adopted for new built development as soon as possible. We are encouraged by the positive example set by Reading Borough Council in policy H5 of their adopted Local Plan, and cite it as an example of positive planning policy that is replicable here. We therefore strongly recommend that the policy is upgraded to a more ambitious zero carbon targets, with consequent benefits for climate change targets and therefore also Norfolk's wildlife.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To support our recommendations for higher energy efficiency and carbon reduction targets.
Attachment(s)	
Consultation Point Title	Sustainable Construction, Energy Efficiency & Carbon Reduction
Consultation Point Number	Policy CC 3
Section of the Plan	Policy CC 3 Sustainable Construction, Energy Efficiency & Carbon Reduction
ID	LPS457
Response Date	07/03/2022 17:25:56
Name	
Organisation	Broadland Housing Association
Agent Name	Mr Jake Lambert
Agent Organisation	Bidwells
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared	It is not effective; It is not justified

<ul style="list-style-type: none"> * It is not effective * It is not justified * It is not consistent with national policy 	
Explanation	<p><u>This policy is unsound as it has not been justified</u></p> <p>BHA supports the objective of this policy to set higher standards of environmental sustainability in new development proposals. Though the requirement for development to achieve reductions in CO2 emissions of a minimum 31% below the Target Emission Rate of Part L Building Regulations should be reconsidered. While it is appreciated that the 31% reduction rate referenced in the policy has been implemented to accommodate the emerging Future Homes Standard, there is no guarantee that this reduction rate will come into force as part of the FHS in due course. Furthermore, there is no evidence within the Local Plan Evidence Base to justify the inclusion of this reduction rate, or analysis to understand whether it is deliverable in practice, casting doubt over the soundness of the policy given conflict with Paragraphs 35(b) and 35(c) of the NPPF.</p>
Modifications requested	<p>By way of comparison, the emerging Greater Norwich Local Plan, which captures neighbouring local authorities (Broadland, South Norfolk, and Norwich City), includes an emerging policy which requires new development to achieve reductions in CO2 emissions of a minimum of 19% below Part L (Policy 2). This is considered to form a more realistic target for new development in North Norfolk, so BHA wishes to suggest that Policy CC3 is amended accordingly.</p> <p>To ensure that the policy is justified, effective and consistent with national policy, and therefore sound, the policy should be revised to 19%</p>
Appear at examination hearing session(s)? <ul style="list-style-type: none"> * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s) 	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Sustainable Construction, Energy Efficiency & Carbon Reduction
Consultation Point Number	Policy CC 3
Section of the Plan	Policy CC 3 Sustainable Construction, Energy Efficiency & Carbon Reduction
ID	LPS474
Response Date	07/03/2022 18:06:18
Name	
Organisation	Crisp Malting Group
Agent Name	Mr Jake Lambert
Agent Organisation	Bidwells
Do you consider the plan to be Legally Compliant? <ul style="list-style-type: none"> * Yes * No 	No
Has the duty to cooperate been met? <ul style="list-style-type: none"> * Yes * No 	Yes
Do you consider the plan to be Sound? <ul style="list-style-type: none"> * Yes * No 	No
Reason(s) not Sound <ul style="list-style-type: none"> * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy 	It is not effective; It is not justified
Explanation	<p><u>This policy is unsound as it has not been justified</u></p> <p>CMG supports the objective of this policy to set higher standards of environmental sustainability in new development proposals. Though the requirement for all non-residential buildings of 250sqm or more to meet a standard of BREEAM 'Very Good' should be reconsidered.</p>

	<p>Paragraph 84 of the Framework establishes that planning policies and decisions should enable the sustainable growth and expansion of all types of businesses in rural areas. This is recognised in paragraph 8.3.1 of the Draft Local Plan. However, enforcing compliance with BREEAM standards through Policy CC3 may limit the development of the rural economy in North Norfolk, if 'Very Good' BREEAM standards prove unattainable and/or financially viable.</p> <p>Furthermore, there is no evidence within the Local Plan Evidence Base to analyse the potential impacts of these standards upon the rural economy, casting doubt over the soundness of the policy given conflict with Paragraphs 35(b) and 35(c) of the NPPF</p>
Modifications requested	The requirement for commercial developments of over 250sqm to meet BREEAM 'Very Good' standards should be reconsidered for the reasons set out in Question 5.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Sustainable Construction, Energy Efficiency & Carbon Reduction
Consultation Point Number	Policy CC 3
Section of the Plan	Policy CC 3 Sustainable Construction, Energy Efficiency & Carbon Reduction
ID	LPS487
Response Date	07/03/2022 18:18:40
Name	
Organisation	Sutherland Homes
Agent Name	Mr Mark Singer
Agent Organisation	Barton Willmore
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	SEE ATTACHED FILE
Modifications requested	SEE ATTACHED FILE
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	Please see representations attached and sent via email
Attachment(s)	220307 Representations to NNDC Draft Local Plan Proposed Submission Version - Two Sites.pdf 220307 Representations to NNDC Draft Local Plan Proposed Submission Version (C16).pdf (2)
Consultation Point Title	Sustainable Construction, Energy Efficiency & Carbon Reduction
Consultation Point Number	Policy CC 3

Section of the Plan	Policy CC 3 Sustainable Construction, Energy Efficiency & Carbon Reduction
ID	LPS497
Response Date	07/03/2022 19:05:00
Name	Mr Raven Cozens-Hardy
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	I welcome the greater emphasis in the updated plan on climate-change mitigating design. I support environmental standards which require energy-efficient construction along with electric vehicle charging points and a greater focus on biodiversity. However, the updated plan makes no mention of the national planning guidance, known as Paragraph 79, which allows the building of architecturally outstanding carbon zero homes in rural areas.
Modifications requested	It is my contention that all local plans should give consideration to this guidance or there will be a regrettable lack of sustainable homes in North Norfolk to act as a template and catalyst for outstanding design in the area. While other parts of the country, including other areas of Norfolk have given permission to houses which fall into this category, to my knowledge, NNDC has not, despite Paragraph 79 being national policy. I hope very much that NNDC will take note of this and ensure that its planning policies are consistent with other local authorities.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Sustainable Construction, Energy Efficiency & Carbon Reduction
Consultation Point Number	Policy CC 3
Section of the Plan	Policy CC 3 Sustainable Construction, Energy Efficiency & Carbon Reduction
ID	LPS722
Response Date	28/02/2022 08:14:00
Name	Mrs Debbie Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	

<p>Has the duty to cooperate been met?</p> <ul style="list-style-type: none"> * Yes * No 	
<p>Do you consider the plan to be Sound?</p> <ul style="list-style-type: none"> * Yes * No 	No
<p>Reason(s) not Sound</p> <ul style="list-style-type: none"> * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy 	
<p>Explanation</p>	<p>We broadly support the proposed policy direction. In developing your policy in this area we offer the following advice:</p> <p>Historic England recognises that by caring for and reusing our heritage assets, energy and carbon dioxide can be saved through better maintenance, management and energy efficiency measures.</p> <p>One of Historic England's key messages on climate change is the need to articulate an evidence-based case for the importance of the historic environment in respect of the embodied carbon value of historic buildings. In particular the contribution that the retention and reuse of old buildings makes, together with the sustainability of traditional building materials and design.</p> <p>A sustainable approach to climate change mitigation measures should aim to secure a balance between the benefits such development delivers and the environmental costs it incurs. Policies/guidance should seek to limit and mitigate any such cost to the historic environment. When considering energy efficiency measures the benefits of alternative options should be weighed against the impact upon heritage assets and their setting.</p> <p>Policies/text should recognise sustainability over the long-term - historic buildings represent a significant investment of expended energy. Demolishing/replacing requires a major reinvestment of embodied energy and other resources. Planning policies should encourage & recognise the benefits of sympathetic restoration/retention/refurbishment/retrofit of historic buildings, rather than demolition and replacement.</p> <p>Historic England publishes a wealth of information detailing how energy efficiency improvements to historic buildings can be carried out without compromising their significance. Referencing the following links to publications may be helpful:</p> <p>Energy efficiency and traditional homes, HEAN 14 https://historicengland.org.uk/images-books/publications/energy-efficiency-and-traditional-homes/advice-14/</p> <p>Energy Efficiency and Historic Buildings: How to Improve Energy Efficiency https://historicengland.org.uk/images-books/publications/eehb-how-to-improve-energy-efficiency/</p> <p>Efficiency and Historic Buildings: Energy Performance Certificates https://historicengland.org.uk/images-books/publications/eehb-energy-performance-certificates/</p> <p>Modifying Historic Windows as Part of Retrofitting Energy-Saving Measures https://historicengland.org.uk/news-events/modifying-historic-windows-as-part-of-retrofitting-energy-saving-measures/</p> <p><u>Part L Building Regulations</u></p> <p>Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L of the Building Regulations are also given to locally listed buildings, buildings of architectural and historic interest within Registered Parks and Gardens and within the curtilages of Scheduled Monuments. Buildings of traditional construction with permeable fabric, both absorbs and readily allows the evaporation of moisture and can therefore be impacted by changes in climate to a greater degree than modern buildings.</p> <p>In developing policy covering this area, you may find the following Historic England guidance helpful: Energy Efficiency and Historic Buildings – Application of Part L of the Building Regulations to historically and traditionally constructed buildings https://historicengland.org.uk/images-books/publications/energy-efficiency-and-historic-buildings/04-energy-efficiency.pdf</p>
<p>Modifications requested</p>	<p>Policy CC3 does not provide for the particular circumstances that apply of the historic environment. Criteria should be added to the policy to address this.</p>
<p>Appear at examination hearing session(s)?</p>	

* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Sustainable Construction, Energy Efficiency & Carbon Reduction
Consultation Point Number	Policy CC 3
Section of the Plan	Policy CC 3 Sustainable Construction, Energy Efficiency & Carbon Reduction
ID	LPS767
Response Date	28/02/2022 16:35:00
Name	Mr Mark Behrendt
Organisation	Home Builders Federation
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	
* Yes	
* No	
Has the duty to cooperate been met?	
* Yes	
* No	
Do you consider the plan to be Sound?	No
* Yes	
* No	
Reason(s) not Sound	It is not consistent with national policy
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	The policy is unsound as it is not consistent with national policy. In paragraph 3.3.6 the Council sets out the Government's phased approach reducing the amount of CO2 emitted by new homes. This policy then seeks to ensure that this policy is in conformity with the ambitions of Government in the Future Homes Standard consultation which was to deliver a 31% improvement, which in the final proposal to be adopted was reduced to a 27% improvement. The HBF supports the Government's phased approach we also consider it important that this is achieved through the Building Regulations and that it is unnecessary for local plans to seek to repeat national mandatory standards. Seeking to replicate such a standard in a local plan can create confusion for decision makers and applicants as to the standard that should be applied. In this case the situation is further confused given that the proposed changes to Building Regulations now being proposed by Government would lead to a 27% reduction in CO2 on current building regulations.
Modifications requested	At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF for the following reasons: <ul style="list-style-type: none"> • Requirements for sustainable construction are inconsistent with national policy Given this shift to securing improvements in energy efficiency through mandatory building regulations which will be introduced in the summer of 2022 we would suggest that policy CC3 is inconsistent with national policy and should be deleted.
Appear at examination hearing session(s)?	Yes, I wish to participate in hearing session(s)
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	I can also confirm that I wish to participate in the relevant hearing sessions in order to full represent our concerns which reflect the views of discussions with our membership who account of 80% of the market housing built in England and Wales.

Attachment(s)	
Consultation Point Title	Sustainable Construction, Energy Efficiency & Carbon Reduction
Consultation Point Number	Policy CC 3
Section of the Plan	Policy CC 3 Sustainable Construction, Energy Efficiency & Carbon Reduction
ID	LPS663
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	We welcome the proactive approach of this policy towards sustainable construction and carbon reduction. Natural England supports the recommendation for a project level HRA, where needed, to address emissions during the construction phase of development process, particularly referring to dust and any likely significant effects from pollution on designated sites.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Sustainable Construction, Energy Efficiency & Carbon Reduction
Consultation Point Number	Policy CC 3
Section of the Plan	Policy CC 3 Sustainable Construction, Energy Efficiency & Carbon Reduction
ID	LPS779
Response Date	07/03/2022 17:00:00
Name	
Organisation	Churchill Retirement Living & McCarthy Stone
Agent Name	Mr Ziyad Thomas
Agent Organisation	Planning Issues Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound?	

* Yes	
* No	
Reason(s) not Sound	
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	<p>The Council's commitment to meeting both its and the UK Government's target of net zero carbon emissions by 2050 is commendable and detailed at length in the justification to Policy CC 3.</p> <p>The wording of the policy encourages developers to maximise opportunities to reduce greenhouse gas emissions and it appears to seek to align itself with the forthcoming The Future Homes Standards which will further reduce CO 2 emissions beyond the current requirements of Part F and Part L of the Building Standards.</p> <p>This is welcomed as there is considerable momentum from Government in preparing enhanced sustainability standards through and it is clear the energy efficiency requirements for domestic and non-domestic buildings will increase sharply in the coming years.</p> <p>Aligning the Council's requirement for carbon neutral development with those of Government is therefore welcomed.</p> <p>We are however of the view that it is unnecessary for local plans to seek to repeat national mandatory standards as this results in confusion and uncertainty for applicants and other key stakeholders.</p>
Modifications requested	<p>We would therefore recommend that subclause 1 is amended to read as follows:</p> <p><i>7. New build residential development, including replacement dwellings, must achieve reductions in CO2 emissions in accordance with the most current requirements of Part L and Part of the Building Regulation, This should be achieved through.</i></p>
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Policy CC 4 Water Efficiency

Consultation Point Title	Water Efficiency
Consultation Point Number	Policy CC 4
Section of the Plan	Policy CC 3 Sustainable Construction, Energy Efficiency & Carbon Reduction
ID	LPS664
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Natural England welcomes a policy that considers water efficiency standards and supports the undertaking of a Water Cycle Study to inform decision making.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Water Efficiency
Consultation Point Number	Policy CC 4
Section of the Plan	Policy CC 4 Water Efficiency
ID	LPS502
Response Date	07/03/2022 20:24:07
Name	Mr Mike Jones
Organisation	Norfolk Wildlife Trust
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound	It is not effective

<ul style="list-style-type: none"> * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy 	
Explanation	We support the inclusion of this policy and in particular, as, depending on where the water is sourced, it can result in negative impacts on sensitive wetland habitats. We also support the inclusion in the policy to 'aspire beyond these ratings where possible'. However, as the policy is currently worded, we believe there would be no requirement for development to meet higher water efficiency ratings than those initially set, even if technology and industry best practice make higher efficiencies viable and easily deliverable. Equally, changes in legislation may require increases in water efficiency standards in order to ensure compliance – for example, the Environment Act places a legal requirement for declines in species abundance to be at least halted by 2030. Whilst the formal definitions of Environment Act target have not yet been defined, in sensitive locations such as the Broads or near elements of the Norfolk Valley Fens SAC, meeting species abundance targets may require water efficiency targets to be tightened beyond existing commitments. Therefore, in order to support delivery of this aspiration, additional wording should be added to commit the Council to regular review of the policy over the plan period.
Modifications requested	As the policy is currently worded, we believe there would be no requirement for development to meet higher water efficiency ratings than those initially set, even if technology and industry best practice make higher efficiencies viable and easily deliverable. Therefore, in order to support delivery of this aspiration, additional wording should be added to commit the Council to regular review of the policy over the plan period.
Appear at examination hearing session(s)? <ul style="list-style-type: none"> * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s) 	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Water Efficiency
Consultation Point Number	Policy CC 4
Section of the Plan	Policy CC 4 Water Efficiency
ID	LPS790
Response Date	28/02/2022 14:38:00
Name	Mr Darl Sweetland
Organisation	Anglian Water
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? <ul style="list-style-type: none"> * Yes * No 	
Has the duty to cooperate been met? <ul style="list-style-type: none"> * Yes * No 	
Do you consider the plan to be Sound? <ul style="list-style-type: none"> * Yes * No 	Yes
Reason(s) not Sound <ul style="list-style-type: none"> * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy 	
Explanation	SUPPORT: Anglian Water supports the Water Efficiency purpose of 3.4.1. to 3.4.6 and Policy CC4. We consider that the policy seeks to require all development to meet or exceed the current 110l/p/p/d standard in the Regulations and to higher standards as these are introduced by Government. We welcome part 3. of the Policy CC4

	<p>which requires developers to show in applications and then through monitoring compliance with the standard. The planning conditions which will follow from Policy CC4 should also require developers to show what steps they will take should monitoring not achieve the standard. This may include, for example, support for retrofitting water efficiency measures in the existing housing stock including social housing.</p>
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Policy CC 5 Coastal Change Management

Consultation Point Title	Coastal Change Management
Consultation Point Number	Policy CC 5
Section of the Plan	Policy CC 5 Coastal Change Management
ID	LPS80
Response Date	04/03/2022 10:37:50
Name	Mr Paul Timewell
Organisation	Blue Sky Leisure
Agent Name	Mr John Long
Agent Organisation	John Long Planning Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<p>Blue Sky Leisure notes that the Policy CC 5's reference to the 'Coastal Change Management Area, as defined on the Policies Map', is a composite of the 2025; 2055; and the 2105 Coastal Erosion Risk Zones (i.e. the area likely to be affected by development over the next 100 years).</p> <p>Blue Sky Leisure has submitted a planning application that seeks to address the impact the erosion zones have on its operation at Woodhill Park, East Runton; and is very concerned that should the Proposal be considered against the Regulation 19 Plan's policy as currently drafted, it is overly restrictive and limits opportunities for the staged/phased 'roll back' or possibly relocation of existing tourism accommodation and related businesses within the Coastal Change Management Area.</p> <p>For instance, the Policy fails to explicitly acknowledge the potential for development such as static caravans and touring caravan pitches, to be safely moved from the most vulnerable areas of the Coastal Change Management Area (the 2025 Coastal Erosion Zone), to the lesser vulnerable areas in the Coastal Change Management Area (the 2055 and 2105 Coastal Erosion Zone); in a managed and phased way.</p> <p>For many businesses along the North Norfolk Coast, a staged/phased 'roll back' of development within the Coastal Change Management Area will be more feasible, viable and deliverable, than a complete and total move outside of the Coastal Change Management Area, particularly given some of the Plan's other restrictive policies, including Policies for new/relocated/replacement tourism accommodation; and policies that seek to protect the character and appearance of the North Norfolk AONB and Countryside.</p>
Modifications requested	<p>Blue Sky Leisure suggest that to make the Local Plan Policy more effective and justified an additional provision is included in the policy after point 5 of Policy CC 5, to explicitly support existing tourist accommodation businesses operating within the Coastal Change Management Area, along the lines of ".....2. For other development proposals within the Coastal Change Management Area planning permission will be granted subject to:.....</p> <p><u>....f. Proposals being for the phased roll-back of tourist accommodation within the Coastal Change Management Area, provided they are from the more vulnerable parts of the area (2025</u></p>

	<p><u>Coastal Erosion Zone) to the less vulnerable parts of the area (2055 and 2105 Coastal Erosion Zones) and will not result in an increased risk to life and will be for a temporary period only (not exceeding 15 years)’</u></p> <p>Also, that confirmation is included to confirm that “...substantial economic, social and environmental benefits to the community...”; is not applicable to existing businesses, particularly those providing tourist accommodation.</p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To further discuss Blue Sky Leisure’s challenges and the positive support the Local Plan should be providing to tourism accommodation business in North Norfolk in response to climate change, coastal adaptation and the covid 19 pandemic.
Attachment(s)	
Consultation Point Title	Coastal Change Management
Consultation Point Number	Policy CC 5
Section of the Plan	Policy CC 5 Coastal Change Management
ID	LPS791
Response Date	28/02/2022 14:38:00
Name	Mr Darl Sweetland
Organisation	Anglian Water
Agent Name	
Agent Organisation	
<p>Do you consider the plan to be Legally Compliant? * Yes * No</p>	
<p>Has the duty to cooperate been met? * Yes * No</p>	
<p>Do you consider the plan to be Sound? * Yes * No</p>	Yes
<p>Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy</p>	
Explanation	SUPPORT: Anglian Water supports policies CC5 and CC6 on Coastal Change and will through our investment plans which have a 30-year horizon, plan investment which supports adaptation including growth in locations which assists displaced communities to relocate.
Modifications requested	
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Coastal Change Management
Consultation Point Number	Policy CC 5
Section of the Plan	Policy CC 5 Coastal Change Management
ID	LPS665
Response Date	25/02/2022 07:52:00
Name	Ms

	Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	We support the use of Coastal Erosion Vulnerability Assessments to explore long-term change as well as the need for developments to consider and be consistent with the relevant Shoreline Management Plan. Natural England welcomes policies with an integrated approach to coastal change and adaptation that balances sustainable levels of economic and community importance whilst protecting the environment.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Policy CC 6 Coastal Change Adaptation

Consultation Point Title	Coastal Change Adaptation
Consultation Point Number	Policy CC 6
Section of the Plan	Policy CC 6 Coastal Change Adaptation
ID	LPS81
Response Date	04/03/2022 10:05:00
Name	Mr Paul Timewell
Organisation	Blue Sky Leisure
Agent Name	Mr John Long
Agent Organisation	John Long Planning Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<p>Blue Sky Leisure has some concerns that the 'roll back' policy as currently drafted, is overly restrictive and limits opportunities for the staged/phased 'roll back' of development from the Coastal Change Management Area to other parts of the Coastal Change Management Area not affected by erosion in the next 50 years; and to locations in the Countryside. BSL acknowledge that the qualifying period has been extended from 20 years as set out in the previous version of the Plan, to 50 years. However, as drafted it still may fail the Justified and Effective Soundness Test.</p> <p>The current drafting of the Policy only allows for the relocation of proposals from the Coastal Change Management Area affected by coastal erosion in the next 50 years of the date of the proposal. However, this may not be the most economically viable or feasible approach to relocation of certain uses. For instance, in some circumstances, it will be more economical and feasible to move development within the Coastal Change Management Area (ie. all erosion risk areas to 2105) that may not be directly affected until after 50 years, (i.e. parts of the 2105 Coastal Erosion Zone), particularly where such development (not affected until after 50 years) is reliant on infrastructure that will be lost to coastal erosion within the next 50 years as in the case at Woodhill Holiday Park.</p> <p>Blue Sky Leisure suggests that this time limit requirement should be deleted, and the policy should allow for the relocation and replacement of community facilities, infrastructure, commercial (including tourism accommodation such as static and touring caravan/camping pitches), agricultural and business uses within other parts of the Coastal Change Management Area, not just those uses that are affected within the next 50 years (from the date of proposal), where it can be feasibly and/or economically justified.</p> <p>The policy should also allow for the temporary siting of development, such as touring and static caravan pitches within different parts of the Coastal Management Area, for instance, to enable pitches to be safely moved from the most vulnerable areas of the Coastal Change Management Area (the 2025 Coastal Erosion Zone), to the lesser vulnerable areas in the Coastal Change Management Area (the 2055 and 2105 Coastal Erosion Zone); in a managed and phased way and for a temporary period, before being eventually moved completely outside of the Coastal Change Management Area.</p>

	Blue Sky Leisure suggests that the policy should allow for the benefits of removing development away from the Coastal Change Management Area, including the continuation of an existing viable business, and the landscape benefits of removing development from coastal areas; to be weighed against the potential impacts on the landscape, townscape or biodiversity in the Countryside.
Modifications requested	<p><i>Proposals for the relocation and replacement of community facilities, infrastructure, commercial, agricultural and business uses affected by coastal erosion will be permitted in the Countryside Policy Area, provided that:</i></p> <ol style="list-style-type: none"> 1 <i>the proposed development replaces that which is in the Coastal Change Management Area as defined on the Policies Map, and is forecast to be affected by erosion within 50 years of the date of the proposal;</i> 2 <i>the new development is beyond the Coastal Change Management Area and is in a location that is well related and accessible to the coastal community from which it was displaced;</i> 3 <i>the site of the development / use it replaces is either cleared and the site rendered safe and managed for the benefit of the local environment, or put to a temporary use that is beneficial to the well-being of the local community, as appropriate; and,</i> 4 <i>taken overall (considering both the new development and that which is being replaced) the proposal should result in no net detrimental impact upon the landscape, townscape or biodiversity of the area, having regard to any special designations, unless outweighed by the social and/or economic benefits accruing from the relocation of the development .</i> 5 <i>4. the temporary siting of touring and static caravan pitches will be permitted within different parts of the Coastal Management Area to enable pitches to be safely moved from the most vulnerable areas of the Coastal Change Management Area (i.e. the 2025 Coastal Erosion Zone), to the lesser vulnerable areas in the Coastal Change Management Area (the 2055 and 2105 Coastal Erosion Zone); in a managed and phased way and for a temporary period only (no more than 15 years), before being eventually relocated completely outside of the Coastal Change Management Area.</i>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To further discuss Blue Sky Leisure's challenges and the positive support the Local Plan should be providing to tourism accommodation business in North Norfolk in response to climate change, coastal adaptation and the covid 19 pandemic.
Attachment(s)	
Consultation Point Title	Coastal Change Adaptation
Consultation Point Number	Policy CC 6
Section of the Plan	Policy CC 6 Coastal Change Adaptation
ID	LPS666
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes

Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	We support the use of Coastal Erosion Vulnerability Assessments to explore long-term change as well as the need for developments to consider and be consistent with the relevant Shoreline Management Plan. Natural England welcomes policies with an integrated approach to coastal change and adaptation that balances sustainable levels of economic and community importance whilst protecting the environment.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Coastal Change Adaptation
Consultation Point Number	Policy CC 6
Section of the Plan	Policy CC 6 Coastal Change Adaptation
ID	LPS792
Response Date	28/02/2022 14:38:00
Name	Mr Darl Sweetland
Organisation	Anglian Water
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	SUPPORT: Anglian Water supports policies CC5 and CC6 on Coastal Change and will through our investment plans which have a 30-year horizon, plan investment which supports adaptation including growth in locations which assists displaced communities to relocate.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

3.7 Flood Risk & Surface Water Drainage

Consultation Point Title	Flood Risk & Surface Water Drainage
Consultation Point Number	3.7
Section of the Plan	3.7.1
ID	LPS279
Response Date	28/02/2022 22:17:00
Name	Dr Marie Strong
Organisation	Wells Flood Action Team
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared
Explanation	This plan identifies that it is underpinned by the 2018 SFRA however the updated modelling for Wells-next-the-Sea was unavailable. If this update has not yet been completed the EA should be supported to complete. If and when completed it could ensure that the unfortunate lack of substantive information regarding Wells throughout the document is rectified.
Modifications requested	Ensure modelling for Wells is up to date and thus provides greater guidance to the SFRA.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

Policy CC 7 Flood Risk & Surface Water Drainage

Consultation Point Title	Flood Risk & Surface Water Drainage
Consultation Point Number	Policy CC 7
Section of the Plan	Policy CC 7 Flood Risk & Surface Water Drainage
ID	LPS44
Response Date	18/02/2022 14:07:26
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Point 1 is not strong enough - all new development should be located to minimise, not materially increase or have regard to - these are not absolutes and will create loopholes. Re point 5 regarding building in flood zones, which can be done with a flood risk assessment by the developer in line with national policy, seems weak. Point 2 e ' Development must demonstrate ..provides adequate foul water treatment...': Anglia Water assess proposals for 10+ dwellings but multiple smaller developments which have a similar impact are not assessed.
Modifications requested	Point 1 - need to say a SuDS is required in all cases. Point 5 - flood risk assessment must be done by national body such as EA. . Point 2 e ' Developers must have evidence of ..Anglian Water assurance that adequate foul water treatment is provided ...':
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Flood Risk & Surface Water Drainage
Consultation Point Number	Policy CC 7
Section of the Plan	Policy CC 7 Flood Risk & Surface Water Drainage
ID	LPS126
Response Date	21/02/2022 15:10:06
Name	Mrs Gemma Harrison
Organisation	Holt Town Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes

Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Holt Town Cllrs raised concerns that point 1 and point 5 are weak policies, it may allow developers to avoid building a SuDS for example or building in a flood zone.
Modifications requested	Cllrs believe no development should take place in known flood zones and would like to see this policy more robust to discourage building in flood zones.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Flood Risk & Surface Water Drainage
Consultation Point Number	Policy CC 7
Section of the Plan	Policy CC 7 Flood Risk & Surface Water Drainage
ID	LPS203
Response Date	23/02/2022 22:50:33
Name	Mrs Gemma Harrison
Organisation	Cley Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Cllrs do not support building on known flood plains.
Modifications requested	Amend poicy to restrict building in flood zones. Wording to be looked at and altered to state that building in flood zones is discouraged.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Flood Risk & Surface Water Drainage
Consultation Point Number	Policy CC 7

Section of the Plan	Policy CC 7 Flood Risk & Surface Water Drainage
ID	LPS598
Response Date	02/03/2022 21:42:00
Name	Mr Jimmy Miller
Organisation	Tunstead Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Tunstead PC are concerned about how any aspects of the Plan will affect flooding in Tunstead Parish as well as traffic in Tunstead Parish.
Modifications requested	The PC feel that it is important to model any influences that a change in another area may have on other parishes, such as Tunstead.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Flood Risk & Surface Water Drainage
Consultation Point Number	Policy CC 7
Section of the Plan	Policy CC 7 Flood Risk & Surface Water Drainage
ID	LPS723
Response Date	28/02/2022 08:14:00
Name	Mrs Debbie Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	

Explanation	Whilst we are in favour of SuDs and measures to address flooding more generally, reference should be made to the consideration of archaeology in planning for SUDs, not only in terms of excavation of land (and potential archaeology) but also in terms of dewatering waterlogged archaeology.
Modifications requested	Make reference to consideration of archaeology.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Flood Risk & Surface Water Drainage
Consultation Point Number	Policy CC 7
Section of the Plan	Policy CC 7 Flood Risk & Surface Water Drainage
ID	LPS793
Response Date	28/02/2022 14:38:00
Name	Mr Darl Sweetland
Organisation	Anglian Water
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	NOTE: Anglian Water notes the limited role that water companies have in managing flood risk set out in the reference to the SFRA in 3.7.1. We support the approach of directing development to Flood Zone 1 areas. SUPPORT: With regards to our specific responsibilities for surface water managed via the public sewer network, Anglian Water recognises (3.7.12) that past development and climate change present an increasing risk that these drainage systems have and may increasingly have insufficient capacity to manage the surface water directed to them. We support the mandating of the use of SuDS in new development (3.7.13 to 3.7.18). Anglian Water welcomes recognition (3.7.19 to 3.7.21) that developments need to consider wider land drainage interests and should address these through mitigation proposed including in the wider area. The early engagement by developers with Anglian Water with the LLFA and EA in surface water drainage design is supported (3.7.21 to 3.7.23) Such engagement by developers should ensure that the foul sewer network will be upgraded to reduce flood risk and reduce or remove the risk of pollution from combined sewers and specifically combined sewer overflows considering climate change impacts. SUPPORT: Anglian Water supports policy CC7 including Footnote 1.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	

Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Flood Risk & Surface Water Drainage
Consultation Point Number	Policy CC 7
Section of the Plan	Policy CC 7 Flood Risk & Surface Water Drainage
ID	LPS667
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Natural England welcome the requirement of SuDS to enhance biodiversity opportunities within new development as highlight under point 6 in policy wording and provide means to minimise risk of flooding. In cooperation with site allocation policies, we agree that a flood risk assessment, along with a surface water and foul sewage strategy, should be included in applications to identify and avoid unacceptable levels of water pollution and risk. We acknowledge the wording in section 3.7.17 which highlights designates sites and the requirement for no net deterioration in water quality.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Policy CC 8 Electric Vehicle Charging

Consultation Point Title	Electric Vehicle Charging
Consultation Point Number	Policy CC 8
Section of the Plan	Policy CC 8 Electric Vehicle Charging
ID	LPS76
Response Date	04/03/2022 09:18:00
Name	Ms Emma Stannard
Organisation	Blakeney Hotel
Agent Name	Mr John Long
Agent Organisation	John Long Planning Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	<p>Blakeney Hotel supports Policy CC 8's aims to deliver more electric vehicle (EV) charging points and is keen to be in a position of providing additional EV charging points at the Hotel.</p> <p>However, the Hotel has concerns over the potential costs that would be incurred in providing the capacity in the electricity supply and distribution network needed to provide additional electric vehicle charging points at the Hotel, (potentially up to 30% of any proposed new Hotel parking spaces).</p> <p>The Hotel understands that to provide the necessary capacity in the local (Blakeney) electricity network to provide additional EV charging at the Hotel (in association with any plans for the Hotel's development/expansion/provision of additional parking areas etc.), taking into account other potential developments in and around the village, would require considerable upgrades and reinforcement to the wider electricity supply and distribution network, as well as the Hotel's own electricity infrastructure.</p> <p>The costs of upgrading the Hotel's electricity infrastructure may even be prohibitive, let alone the cost of upgrades to the wider electricity supply and distribution network to support EV charging and would have the potential to add a further financial burden to the Hotel's operation, which could impact on the Hotel's ability to remain competitive. The Hotel is keen to hear the District Council's plans for seeking improvements to the area's electricity supply and distribution network; and measures/interventions that it may have at its disposal to encourage/require UK Power Network to accelerate its plans for upgrades to the network serving North Norfolk and Blakeney. The Hotel requests that the Policy acknowledges that it may not be technically feasible and/or financially viable to deliver the minimum level of EV points requested by the Policy.</p>
Modifications requested	<p>Blakeney Hotel requests that Policy CC 8 Section 4 is amended to only require the provision of electric vehicle charging points where it is technically feasible and financially viable to do so, taking into account the cost of electricity infrastructure reinforcement and upgrades necessary:</p> <p>4. Proposals for hotels (use class C1) will include active (1) provision for electric vehicle charging points of a minimum of 30% of all new parking spaces, <u>subject to technical feasibility and financial viability.</u></p>

Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To discuss the Blakeney Hotel's representations.
Attachment(s)	
Consultation Point Title	Electric Vehicle Charging
Consultation Point Number	Policy CC 8
Section of the Plan	Policy CC 8 Electric Vehicle Charging
ID	LPS384
Response Date	07/03/2022 11:34:29
Name	
Organisation	Holkham Estate
Agent Name	Mr Garth Hanlon
Agent Organisation	Savills (UK) Limited
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<p>Policy CC8 – Electric Vehicle Charging</p> <p>Savills (UK) Limited is instructed by the Holkham Estate to make the necessary and relevant representations to the Regulation 19 Local Plan document currently out for consultation. As a major landowner within the District, it is important to engage with the Development Plan process and as such, the representations are submitted to ensure that the Plan is positively prepared, justified, effective and consistent with National Policy within the NPPF.</p> <p>The Council has identified the purpose for this Policy to ensure the delivery of appropriate vehicle charging infrastructure and to future proof developments within the District. With the Government Strategy of securing greater numbers of Ultra-low Emission Vehicles alongside commitments to ending sales of new petrol and diesel cars and vans by 2030, this reflects a significant move to electric power vehicles. A consequence of this is of course to ensure that the necessary infrastructure is in place to provide for demand for such charge-points.</p> <p>Holkham Estate is one of the most pioneering and sustainable Estates in the country and is very aware of its responsibilities in terms of management of landscape, farmland habitats and wildlife as well as ensuring commitment to sustainability credentials in respect of any relevant land assets coming forward.</p> <p>The policy for Electric Vehicle Charging is welcomed as a principle but supporting paragraph 3.8.7 to 3.8.8 serves to confuse matters.</p> <p>Paragraph 3.8.8 states that <i>“the next version of the County Council’s Parking Standards will incorporate required levels of Electric Vehicle charging points for different types of developments. Any such future standards will be a material consideration and consequently, any relevant development schemes will need to accord with either these standards or the details set out in this draft policy, whatever provides the greater level of Electric Vehicle charge point provision”</i>.</p> <p>We do not consider such wording to be appropriate within a Regulation 19 version of a Local Plan on the basis that the content of this document is intended to be the wording to be adopted as a Development Plan. As such reference to a “Draft” Policy is</p>

	<p>inappropriate because one cannot make reference to a “Draft” Policy at this stage of the development plan process. Similarly, a rather sweeping statement which states that the relevant Policy will be one with the greatest level of Electric Vehicle charging provision cannot be justified at this stage.</p> <p>We are further concerned at a policy that makes no reference to the issues of power supply and the access to that power supply. The Council recognises the undoubted rural character of the District and sometimes the isolated nature of development and the consequential infrastructure costs for the provision of services.</p> <p>Having regard to the above we consider that the plan is not justified in terms of its wording and thus not effective.</p> <p>In such circumstances we suggest that new text should be inserted within paragraph 1 of Policy CC8 to read <i>“proposals for Vehicle Parking is incorporated, will include appropriate provision for Electric Vehicle Charging-points, taking account of the development type and size, the level of parking provision, its context, location, availability and accessibility to necessary power supply.....”</i></p>
Modifications requested	<p>The policy for Electric Vehicle Charging is welcomed as a principle but supporting paragraph 3.8.7 to 3.8.8 serves to confuse matters.</p> <p>Paragraph 3.8.8 states that <i>“the next version of the County Council’s Parking Standards will incorporate required levels of Electric Vehicle charging points for different types of developments. Any such future standards will be a material consideration and consequently, any relevant development schemes will need to accord with either these standards or the details set out in this draft policy, whatever provides the greater level of Electric Vehicle charge point provision”</i>.</p> <p>We do not consider such wording to be appropriate within a Regulation 19 version of a Local Plan on the basis that the content of this document is intended to be the wording to be adopted as a Development Plan. As such reference to a “Draft” Policy is inappropriate because one cannot make reference to a “Draft” Policy at this stage of the development plan process. Similarly, a rather sweeping statement which states that the relevant Policy will be one with the greatest level of Electric Vehicle charging provision cannot be justified at this stage.</p> <p>We are further concerned at a policy that makes no reference to the issues of power supply and the access to that power supply. The Council recognises the undoubted rural character of the District and sometimes the isolated nature of development and the consequential infrastructure costs for the provision of services.</p> <p>Having regard to the above we consider that the plan is not justified in terms of its wording and thus not effective.</p> <p>In such circumstances we suggest that new text should be inserted within paragraph 1 of Policy CC8 to read <i>“proposals for Vehicle Parking is incorporated, will include appropriate provision for Electric Vehicle Charging-points, taking account of the development type and size, the level of parking provision, its context, location, availability and accessibility to necessary power supply.....”</i></p>
Appear at examination hearing session(s)?	No, I do not wish to participate in examination hearing session(s)
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Electric Vehicle Charging
Consultation Point Number	Policy CC 8
Section of the Plan	Policy CC 8 Electric Vehicle Charging
ID	LPS400
Response Date	07/03/2022 15:15:00
Name	Mr Will Wright
Organisation	ESCO Developments, Flagship Housing Group & Lovell Partnerships
Agent Name	Sarah Hornbrook

Agent Organisation	Bidwells LLP
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	<p>Part 2 of the policy, as written, requires one active charging point to be provided per dwelling, in the form of an external charging point on a driveway or a wall-mounted internal charging point in a garage. The policy also requires, where off-plot or communal parking is provided, a minimum of 50% of spaces will provide active chargepoints with the remainder as passive.</p> <p>The Consortium supports the transition towards increased usage of electric vehicles, and wishes to support its residents in providing electric vehicle charging infrastructure within their developments, with chargers provided to garages and on-plot driveways. However, the requirement for off-plot or communal charging provision to the level specified within the draft policy raises concerns, as the technical, legal and practical implications of running electric cables over or under land outside of the control of the user of the parking space has significant deliverability implications.</p> <p>The Local Plan Evidence Base does not include analysis to understand whether off-plot electric vehicle charging provision at the level identified in the draft policy is deliverable in practice, in accordance with Paragraph 35(b) of the NPPF. To ensure compliance with this aspect of the Framework, Policy CC8 should be amended to ensure that development is not constrained by potentially undeliverable off-plot electric car charging provision, and to align with mandatory standards introduced by an update to Part S of the Building Regulations from June 2022.</p>
Modifications requested	<p>Suggested revisions to the wording are set out below. Proposed additional wording is shown in <i>italics</i>, and suggested omissions are shown struckthrough.</p> <p>Proposals for residential development (excluding use class C1 hotels and C2/C2A residential institutions) where private driveways and garages are provided, will provide 1 active(1) charging point per unit, in the form of an external charging point on a driveway or a wall-mounted internal charging point in a garage. Where off-plot or communal parking is provided, <i>active and passive chargepoints will be provided wherever practical and feasible</i> a minimum of 50% of spaces will provide active(1) chargepoints and the remainder will be passive(2). The spaces should be made available to all residents in accordance with a management agreement.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	I reserve the right to appear prior to publication of the draft agendas that will set out the Inspector's matters and questions to form the basis of the discussions at the Hearings. The intention to appear is to seek to ensure that the Policy can be made sound.
Attachment(s)	
Consultation Point Title	Electric Vehicle Charging
Consultation Point Number	Policy CC 8
Section of the Plan	Policy CC 8 Electric Vehicle Charging
ID	LPS431
Response Date	07/03/2022 14:36:50

Name	
Organisation	Hopkins Homes
Agent Name	Mr Jake Lambert
Agent Organisation	Bidwells
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	<u>This policy is unsound as it has not been justified</u> Part 2 of the policy, as written, requires one active charging point to be provided per dwelling, in the form of an external charging point on a driveway or a wall-mounted internal charging point in a garage. The policy also requires, where off-plot or communal parking is provided, a minimum of 50% of spaces will provide active chargepoints with the remainder as passive. Hopkins Homes supports the transition towards increased usage of electric vehicles, and wishes to support its residents in providing electric vehicle charging infrastructure within their developments, with chargers provided to garages and on-plot driveways. However, the requirement for off-plot or communal charging provision to the level specified within the draft policy raises concerns, as the technical, legal and practical implications of running electric cables over or under land outside of the control of the user of the parking space has significant deliverability implications. The Local Plan Evidence Base doesn't include analysis to understand whether off-plot electric vehicle charging provision at the level identified in the draft policy is deliverable in practice, in accordance with Paragraph 35(b) of the NPPF.
Modifications requested	To ensure compliance with this aspect of the Framework, Policy CC8 should be amended to ensure that development is not constrained by potentially undeliverable off-plot electric car charging provision, and to align with mandatory standards introduced by an update to Part S of the Building Regulations from June 2022. To achieve this, the following wording refinement to Part 2 of the policy is suggested: <i>Proposals for residential development (excluding use class C1 hotels and C2/C2A residential institutions) where private driveways and garages are provided, will provide 1 active(1) charging point per unit, in the form of an external charging point on a driveway or a wall-mounted internal charging point in a garage. Where off-plot or communal parking is provided, active and passive chargepoints will be provided wherever practical and feasible a minimum of 50% of spaces will provide active(1) chargepoints and the remainder will be passive(2). The spaces should be made available to all residents in accordance with a management agreement</i>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Electric Vehicle Charging
Consultation Point Number	Policy CC 8
Section of the Plan	Policy CC 8 Electric Vehicle Charging

ID	LPS458
Response Date	07/03/2022 16:31:46
Name	
Organisation	Broadland Housing Association
Agent Name	Mr Jake Lambert
Agent Organisation	Bidwells
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<u>This policy is unsound as it has not been justified</u> Part 2 of the policy, as written, requires one active charging point to be provided per dwelling, in the form of an external charging point on a driveway or a wall-mounted internal charging point in a garage. The policy also requires, where off-plot or communal parking is provided, a minimum of 50% of spaces will provide active chargepoints with the remainder as passive. BHA supports the transition towards increased usage of electric vehicles, and wishes to support its residents in providing electric vehicle charging infrastructure within their developments, with chargers provided to garages and on-plot driveways. However, the requirement for off-plot or communal charging provision to the level specified within the draft policy raises concerns, as the technical, legal and practical implications of running electric cables over or under land outside of the control of the user of the parking space has significant deliverability implications. The Local Plan Evidence Base doesn't include analysis to understand whether off-plot electric vehicle charging provision at the level identified in the draft policy is deliverable in practice, in accordance with Paragraph 35(b) of the NPPF.
Modifications requested	To ensure compliance with Paragraph 35(b) of the Framework, Policy CC8 should be amended to ensure that development is not constrained by potentially undeliverable off-plot electric car charging provision, and to align with mandatory standards introduced by an update to Part S of the Building Regulations from June 2022. To achieve this, the following wording refinement to Part 2 of the policy is suggested: <i>Proposals for residential development (excluding use class C1 hotels and C2/C2A residential institutions) where private driveways and garages are provided, will provide 1 active(1) charging point per unit, in the form of an external charging point on a driveway or a wall-mounted internal charging point in a garage. Where off-plot or communal parking is provided, active and passive chargepoints will be provided wherever feasible and practical a minimum of 50% of spaces will provide active(1) chargepoints and the remainder will be passive(2). The spaces should be made available to all residents in accordance with a management agreement</i>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Electric Vehicle Charging

Consultation Point Number	Policy CC 8
Section of the Plan	Policy CC 8 Electric Vehicle Charging
ID	LPS488
Response Date	07/03/2022 18:21:28
Name	
Organisation	Sutherland Homes
Agent Name	Mr Mark Singer
Agent Organisation	Barton Willmore
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	SEE ATTACHED FILE
Modifications requested	SEE ATTACHED FILE
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	Please see representations attached and sent via email
Attachment(s)	220307 Representations to NNDC Draft Local Plan Proposed Submission Version (C16).pdf (3) 220307 Representations to NNDC Draft Local Plan Proposed Submission Version - Two Sites.pdf (1)
Consultation Point Title	Electric Vehicle Charging
Consultation Point Number	Policy CC 8
Section of the Plan	Policy CC 8 Electric Vehicle Charging
ID	LPS768
Response Date	28/02/2022 16:35:00
Name	Mr Mark Behrendt
Organisation	Home Builders Federation
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified	It is not consistent with national policy

* It is not consistent with national policy	
Explanation	The policy is unsound as it is not consistent with national policy. The HBF recognise the need to increase access to electric vehicle charging points as the ownership of such cars grows. However, the HBF consider the most effective approach in relation to residential development is that set out by the Government which will see mandatory standards set out through building regulations being implemented through an update part S of the Building Regulations from June 2022. This approach provides the necessary consistency across the country as to what is required both in terms of the number of charging points but also the technical standard as to the type of charger to be used.
Modifications requested	As such the Council should delete the requirement for electric vehicle charging points from the local plan.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	I can also confirm that I wish to participate in the relevant hearing sessions in order to full represent our concerns which reflect the views of discussions with our membership who account of 80% of the market housing built in England and Wales.
Attachment(s)	
Consultation Point Title	Electric Vehicle Charging
Consultation Point Number	Policy CC 8
Section of the Plan	Policy CC 8 Electric Vehicle Charging
ID	LPS780
Response Date	07/03/2022 17:00:00
Name	
Organisation	Churchill Retirement Living & McCarthy Stone
Agent Name	Mr Ziyad Thomas
Agent Organisation	Planning Issues Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	The Council's commitment to sustainable transport modes is commendable. We note however that the North Norfolk District Council Interim Plan Wide Viability Assessment (hereafter referred to as the LPVA) undertaken by NCS does not allow any uplift in cost for the provision of electric vehicle charging points. We would respectfully remind the Council that the PPG states that "The role for viability assessment is primarily at the plan making stage Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan" (Paragraph: 002 Reference ID 10-002-20190509) While we have no objection to the aims or objectives of this policy, however it is not 'justified' by a proportionate level of evidence in the

	North Norfolk District Council Interim Plan Wide Viability Assessment and the proposed Local Plan is unsound as a consequence.
Modifications requested	That a proportionate and appropriate cost is attributed for the provision of electric vehicle charging points in the North Norfolk District Council Interim Plan Wide Viability Assessment We respectfully refer the Council to the evidence supporting the Government's response to the consultation on EVCPs estimated an installation cost of between £615 to £1,115 per EVCP for off-street parking and between £975 and £2,947 per charge point for multi-occupancy surface parking.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

3.9 Sustainable Transport

Consultation Point Title	Sustainable Transport
Consultation Point Number	3.9
Section of the Plan	3.9.5
ID	LPS625
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	<i>3.9.5 A primary planning consideration is to ensure that development proposals achieve a suitable connection to the highway that is safe for pedestrians, cyclists and occupants of vehicles. Equally important is the need to ensure that road safety is not jeopardised by allowing proposals that would generate levels of traffic beyond the capacity of the surrounding road network.</i> This does not meet the "Effective" test of soundness. We consider that we have already reached the point where levels of traffic are beyond the capacity of the road network. Any further development will exacerbate existing problems.
Modifications requested	The Plan needs to recognise the need for improvements to infrastructure. It also needs to ensure that development meets the genuine needs of the district, rather than the arbitrary 9,600 more houses, the construction of which will suck in additional traffic, especially if they are used as second homes/holiday lets.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Sustainable Transport
Consultation Point Number	3.9
Section of the Plan	3.9.6
ID	LPS626
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	

Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	<p>3.9.6 All new development is required to address the transport implications of that development. Larger schemes are required to prepare Travel Statements or Transport Assessments (TA) to illustrate how the amount of trips generated will be accommodated and how accessibility to the site by all modes of transport will be achieved. For proposals that are likely to have significant transport implications, the Government also requires the submission of Travel Plans, the purpose of which is to promote more sustainable forms of transport in relation to the activities of a particular development by (e.g. encouraging reductions in car usage and increased use of public transport, walking and cycling). The PPG also provides information on the circumstances in which Travel Plans, Transport Assessments and Transport Statements will be required and what they should contain.</p> <p>This does not meet the "Effective" test of soundness.</p> <p>Although this is an excellent idea in principle, it is recognised that many of these houses will be taken by second home owners, who will almost certainly travel here by car, putting pressure on the main roads, especially in the peak season. Public transport is inadequate, and both residents and second home owners are therefore likely to use car transport. The Plan does not state how reduction in car usage is actually to be achieved?</p>
Modifications requested	<p>In order for this Plan to be effective, there is a need for specific requirements of developers to enhance public transport as well as links to this on foot or by bicycle, and for the District and County Councils to address the inadequacy of local transport.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

Consultation Point Title	Sustainable Transport
Consultation Point Number	Policy CC 9
Section of the Plan	Policy CC 9 Sustainable Transport
ID	LPS45
Response Date	17/02/2022 18:47:41
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Para 5. The following is insufficient assurance that roads will be kept safe for all road users 'development will be considered against the following criteria', one of which is point 4 whether the volume of traffic is affecting amenity or character of an area - what metrics will be used?
Modifications requested	<i>I would suggest definitions of 'unacceptable impacts' and 'significant amounts' and lower threshold for requirement of a travel plan</i>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Sustainable Transport
Consultation Point Number	Policy CC 9
Section of the Plan	Policy CC 9 Sustainable Transport
ID	LPS204
Response Date	23/02/2022 22:57:54
Name	Mrs Gemma Harrison
Organisation	Cley Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes	No

* No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Cllrs were concerned with point 4, this is a difficult policy to implement. Any increase of traffic will have a negative impact and therefore how severe that impact is will depend on who is assessing it and who is impacted.
Modifications requested	Cllrs felt this could be re-worded better.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Sustainable Transport
Consultation Point Number	Policy CC 9
Section of the Plan	Policy CC 9 Sustainable Transport
ID	LPS668
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Large infrastructure schemes present opportunities to secure net gains for biodiversity and wider environmental gains and we advise that this is included within the supportive text of the policy. New development should actively encourage sustainable transport options (walking, cycling and use of public transport). Where possible cycle lanes and footpaths should be situated away from busy roads, publicised and well signposted to encourage use. They can provide opportunities for biodiversity enhancement by planting trees, hedgerows and pollen and nectar rich species, facilitating species movement and habitat connectivity. We suggest biodiversity enhancements are considered and implemented at every opportunity.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

3.10 Biodiversity Net Gain

Consultation Point Title	Biodiversity Net Gain
Consultation Point Number	3.10
Section of the Plan	3.10.4
ID	LPS627
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	<i>3.10.4 Measurable biodiversity net gains will be sought for all development at the very least in accordance with the minimum requirements of the policy and proportionate to the scale of the proposal and any potential impacts and any subsequent mandatory targets. A development with limited or no impacts on biodiversity will still need to demonstrate a measurable biodiversity net gain.</i> This does not meet the "Effective" test of soundness. This (and indeed other aspects of the Plan such as rainwater capture etc) also need to apply to extensions. In the Parish of Weybourne extensions that increase the existing footprint by a third or more have been approved recently, and if this continues, there will be a significant impact i.e. three extensions = 1 new house. If this is not applied, there will be a steady erosion of net biodiversity and habitat.
Modifications requested	This Plan is not effective without specifically stating that all biodiversity and climate change rulings apply THROUGHOUT to extensions, including those developed via the permitted development route.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Biodiversity Net Gain
Consultation Point Number	3.10
Section of the Plan	3.10.7
ID	LPS629
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	

Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	This is an excellent clause.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Biodiversity Net Gain
Consultation Point Number	3.10
Section of the Plan	3.10.5
ID	LPS628
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	<p>3.10.5 It is possible to achieve BNG for small scale development and those where there is little or no impact on biodiversity. Small-scale development proposals form a significant proportion of the planning applications received by this authority and collectively these applications could make a notable contribution to BNG.</p> <p>This does not meet the "Effective" test of soundness.</p> <p>This does not state that this also applies to extensions, including those developed via the permitted development route.</p>
Modifications requested	This Plan is not effective without explicitly stating that it applies to extensions – including those developed via the permitted development route – as well as new houses.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s)	Yes, I wish to participate in hearing session(s)

* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Biodiversity Net Gain
Consultation Point Number	3.10
Section of the Plan	3.10.9
ID	LPS630
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	<p>3.10.9 The mitigation hierarchy is fundamental in the development of biodiversity net gain and applicants must do everything possible to first avoid and then minimise impacts on biodiversity and only as a last resort, and in agreement with decision makers, compensate for losses that cannot be avoided. If adequately compensating for losses within the development footprint is not possible biodiversity losses should then be offset by gains elsewhere. The mitigation hierarchy should be applied in the sequential order as set out in Table 1 'Applying the Mitigation Hierarchy', with each stage taken in turn and all possibilities considered before moving onto the next stage. Development and biodiversity net gain proposals will be required to demonstrate the consideration and feasibility of each stage rather than assume provision can be accommodated off-site through compensation at the beginning. In following the mitigation hierarchy, significant loss of distinctive habitats on sites is avoided. If it is demonstrated that it is not possible to avoid, mitigate and compensate all impacts on site then compensatory habitat creation should be obtained firstly through a combination of on-site and local third party schemes, then local third party schemes only, and lastly through any statutory credit scheme. Off-site provision should be informed by and support Local Nature Recovery strategies, wider policy objectives and those of the emerging Local Nature Recovery Strategy.</p> <p>This does not meet the "Effective" test of soundness.</p> <p>This does not state that this also applies to extensions, including those developed via the permitted development route.</p>
Modifications requested	The Plan needs to specify that it covers small-scale developments and extensions. Even for small-scale extensions, it ought to be possible to achieve net gain, even if that has to be off-site, via contributions to local conservation charities/purchase of offsetting certificates.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

Consultation Point Title	Biodiversity Net Gain
Consultation Point Number	3.10
Section of the Plan	3.10 Biodiversity Net Gain
ID	LPS221
Response Date	24/02/2022 11:08:00
Name	Ms Sarah Mitchell
Organisation	RSPB
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	RSPB supports this part of the Plan.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Biodiversity Net Gain
Consultation Point Number	3.10
Section of the Plan	3.10 Biodiversity Net Gain
ID	LPS622
Response Date	07/03/2022 15:06:00
Name	Alicia Hull & Peter Crouch
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	

Explanation	Although thankfully improving biodiversity seems a significant part of the plan, somewhere we noticed (but have not been able to trace it again) development is asked to maintain the existing bio-diversity. Or mitigate for it. We would point out that the existing bio-diversity is not an acceptable level. It has been destroyed over the years.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Policy CC 10 Biodiversity Net Gain

Consultation Point Title	Biodiversity Net Gain
Consultation Point Number	Policy CC 10
Section of the Plan	Policy CC 10 Biodiversity Net Gain
ID	LPS100
Response Date	17/02/2022 18:58:13
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Development must demonstrate a 10% biodiversity net gain- is this all development, extensions and sub divisions
Modifications requested	ALL development must demonstrate a 10% biodiversity net gain- is this all development, extensions and sub divisions
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Biodiversity Net Gain
Consultation Point Number	Policy CC 10
Section of the Plan	Policy CC 10 Biodiversity Net Gain
ID	LPS165
Response Date	22/02/2022 16:01:16
Name	Miss Naomi Chamberlain
Organisation	Norfolk County Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound	

* It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	The County Council supports policy CC10.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Biodiversity Net Gain
Consultation Point Number	Policy CC 10
Section of the Plan	Policy CC 10 Biodiversity Net Gain
ID	LPS195
Response Date	23/02/2022 18:32:00
Name	Miss Donna Clarke
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective It is not consistent with national policy
Explanation	The policy should include the minimum percentage of 10%. It is not clear why BMV land should be avoided for BNG if it is not being farmed and there is no prospect of it being returned to agricultural use. Using agricultural land for biodiversity enhancements can protect it from unwanted development.
Modifications requested	Compliance with the Environment Bill and subsidiary legislation.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Biodiversity Net Gain
Consultation Point Number	Policy CC 10
Section of the Plan	Policy CC 10 Biodiversity Net Gain
ID	LPS631
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council

Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	<p>1 Development must achieve a minimum of 10% Biodiversity Net Gain, or higher as stipulated in national legislation, over the pre-development biodiversity value as measured by the DEFRA Biodiversity Metric or agreed equivalent.</p> <p>2 Development proposals will be accompanied by a biodiversity net gain strategy that:</p> <p>a. Establishes the pre-development biodiversity value of the development site;</p> <p>b. Demonstrates that the mitigation hierarchy below has been employed in securing biodiversity net gain; i. Avoidance ii. Mitigation iii. Compensation</p> <p>c. Clarifies and explains the predicted biodiversity outcomes both qualitatively and quantitatively; and,</p> <p>d. Details of how the biodiversity net gain will be maintained for at least 30 years after the development is completed.</p> <p>This does not meet the "Effective" test of soundness.</p> <p>There appears to be no mechanism for ensuring that the biodiversity net gain is monitored and enforced. Moreover, while at least 30 years complies with national law, it is too short a period.</p>
Modifications requested	The Plan should include a monitoring and enforcement mechanism. All biodiversity net gain should be required to be maintained for at least the lifetime of the development.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Biodiversity Net Gain
Consultation Point Number	Policy CC 10
Section of the Plan	Policy CC 10 Biodiversity Net Gain
ID	LPS503
Response Date	07/03/2022 20:31:48
Name	Mr Mike Jones
Organisation	Norfolk Wildlife Trust
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes	No

* No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	We support the inclusion of this policy ahead of the likely 2023 implementation dates for the mandatory BNG requirements arising from the 2021 Environment Act. We support the supporting text which sets out the mitigation hierarchy, as it is important that it is understood that BNG does not allow for bypassing the existing requirements for site protection set out in wildlife law and planning policy. However, we do not believe that the policy wording is clear that BNG is not acceptable where residual impacts on protected features still occur.
Modifications requested	In order to ensure that the policy is effective, we recommend that in table 1, point 3, reference should be added for clarity that where residual impacts are still unacceptable, for example with residual protected species impacts expected, then BNG will not be accepted.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Biodiversity Net Gain
Consultation Point Number	Policy CC 10
Section of the Plan	Policy CC 10 Biodiversity Net Gain
ID	LPS794
Response Date	28/02/2022 14:38:00
Name	Mr Darl Sweetland
Organisation	Anglian Water
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	SUPPORT: Anglian Water supports policy CC10 on Biodiversity Net Gain.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Biodiversity Net Gain
Consultation Point Number	Policy CC 10

Section of the Plan	Policy CC 10 Biodiversity Net Gain
ID	LPS669
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	We welcome a policy that encourages commitment to biodiversity net gain targets through the accompaniment of a biodiversity net gain strategy and the use of the DEFRA Biodiversity Metric.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Biodiversity Net Gain
Consultation Point Number	Policy CC 10
Section of the Plan	Policy CC 10 Biodiversity Net Gain
ID	LPS781
Response Date	07/03/2022 17:00:00
Name	
Organisation	Churchill Retirement Living & McCarthy Stone
Agent Name	Mr Ziyad Thomas
Agent Organisation	Planning Issues Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified

Explanation	<p>The Council's commitment towards new development achieving a minimum of 10% net gain for biodiversity in the Authority is commendable. We have no objection to the aims or objectives of this policy.</p> <p>We note that the North Norfolk District Council Interim Plan Wide Viability Assessment does not incorporate additional costs for the provision of biodiversity net gain on sites.</p> <p>We would respectfully remind the Council that the PPG states that "The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan" (Paragraph 002 Reference ID 10-002-20190509)</p> <p>While we have no objection to the aims or objectives of this policy, however it is not 'justified' by a proportionate level of evidence in the North Norfolk District Council Interim Plan Wide Viability Assessment and the proposed Local Plan is unsound as a consequence.</p>
Modifications requested	<p>That a proportionate and appropriate cost is attributed towards new development achieving a minimum of 10% net gain for biodiversity in the North Norfolk District Council Interim Plan Wide Viability Assessment (2018).</p> <p>We respectfully refer the Council to Table 14. of the DEFRA report entitled Biodiversity net gain and local nature recovery strategies Impact Assessment (2020) advises that the cost of delivering 10% net gain to be circa £18,000 per hectare in the East of England.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Biodiversity Net Gain
Consultation Point Number	Policy CC 10
Section of the Plan	Policy CC 10 Biodiversity Net Gain
ID	LPS810
Response Date	07/03/2022 18:09:00
Name	
Organisation	Turley Planning
Agent Name	Mr Steve Kosky
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared It is not justified It is not consistent with national policy
Explanation	<p>7.1 Policy CC 10 sets out that all development must achieve a minimum of 10% Biodiversity Net Gain (BNG), or higher as stipulated in national legislation, reflecting the provisions set out within the Environment Act 2021, which are expected to become law in 2023.</p> <p>7.2 Whilst we fully recognise the importance of BNG and support the Council's aspiration to achieve a 10% uplift, the policy, as currently</p>

	<p>worded, is not sufficiently flexible, as it does not provide for the full range of options which are anticipated to be introduced by the Environment Act.</p> <p>7.3 In addition to setting out a mandatory requirement for 10% gain, the Act provides for habitat to be delivered on-site, off-site or via statutory biodiversity credits. Policy CC 10 should therefore be revised to be more flexible, by allowing for new habitat to meet the 10% requirement to be provided either on-site or off-site.</p> <p>7.4 The policy should also allow for 10% gain to be achieved via statutory biodiversity credits, when they are brought into effect. The failure to make these changes means that many of the allocation sites identified within the Local Plan may be rendered undeliverable.</p> <p>7.5 As such, Policy CC 10 is not positively prepared as it is too prescriptive and requires onsite provision in every case, at the potential expense of quantum of delivery. The Policy is also not justified as it fails to correctly reflect the provisions which are set out within the Environment Act.</p> <p>7.6 Accordingly, by reason of the above omissions, Policy CC 10 is also not consistent with national policy.</p>
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

3.11 Green Infrastructure

Consultation Point Title	Green Infrastructure
Consultation Point Number	3.11
Section of the Plan	3.11.5
ID	LPS222
Response Date	24/02/2022 11:09:00
Name	Ms Sarah Mitchell
Organisation	RSPB
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	RSPB supports this part of the Plan.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Green Infrastructure
Consultation Point Number	3.11
Section of the Plan	3.11.4
ID	LPS724
Response Date	28/02/2022 08:14:00
Name	Mrs Debbie Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified	

<p>* It is not consistent with national policy</p>	
<p>Explanation</p>	<p>Historic England would highlight that Green Infrastructure should not only be considered in terms of the natural environment, health and recreation but also the role it can play in conserving and enhancing the historic environment. It can be used to:</p> <ul style="list-style-type: none"> • conserve and enhance heritage assets • improve setting of heritage assets • improve access to heritage assets • create a sense of place and tangible link with local history • create linkages between heritage assets and other green infrastructure <p>There is an important synergy between the historic and natural environment. Countryside, landscape parks and the open spaces in our cities, towns and villages often have heritage interest, and it would be helpful to highlight this. It is important not to consider 'multi-functional' spaces only in terms of the natural environment, health and recreation. It may be helpful to make reference in the supporting text to the role GI can have to play in enhancing and conserving the historic environment. It can be used to improve the condition and setting of heritage assets and to improve access to them. Likewise the historic environment can help contribute to the quality, character and distinctiveness of green spaces by helping to create a sense of place and a tangible link with local history. Opportunities can be taken to link new GI networks into already existing green spaces in town or existing historic spaces such as church yards to improve the setting of historic buildings or historic townscape. Suggest adding sentence in paragraph 3.11.4 to this effect.</p>
<p>Modifications requested</p>	<p>Reference role of GI in conserving and enhancing historic environment in paragraph 3.11.4</p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	
<p>Justification for appearing at hearing</p>	
<p>Attachment(s)</p>	

Consultation Point Title	Green Infrastructure
Consultation Point Number	Policy CC 11
Section of the Plan	CC11
ID	LPS166
Response Date	22/02/2022 16:02:09
Name	Miss Naomi Chamberlain
Organisation	Norfolk County Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	The County Council supports policy CC11.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Green Infrastructure
Consultation Point Number	Policy CC 11
Section of the Plan	Policy CC 11 Green Infrastructure
ID	LPS46
Response Date	18/02/2022 14:13:33
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified	It is not effective

* It is not consistent with national policy	
Explanation	Para 2 & 3 - Green Infrastructure - is this strong enough? All developments to include green infrastructure but if they can't they can pay to enhance green infrastructure elsewhere- this is reduced amenity for residents and not very sustainable with car journeys required to eg walk your dog.
Modifications requested	All developments to include green infrastructure but if they can't they shall pay to enhance green infrastructure either immediately adjacent to site or sustainably accessible.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Green Infrastructure
Consultation Point Number	Policy CC 11
Section of the Plan	Policy CC 11 Green Infrastructure
ID	LPS127
Response Date	21/02/2022 15:12:54
Name	Mrs Gemma Harrison
Organisation	Holt Town Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Holt Town Council fully supports this policy. Holt Town Cllrs commented that they would like to see all development deliver GI on site where possible and if not possible then GI should be delivered as close as reasonably possible to the existing site.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Green Infrastructure
Consultation Point Number	Policy CC 11
Section of the Plan	Policy CC 11 Green Infrastructure
ID	LPS401
Response Date	07/03/2022 15:16:00
Name	Mr

	Will Wright
Organisation	ESCO Developments, Flagship Housing Group & Lovell Partnerships
Agent Name	Sarah Hornbrook
Agent Organisation	Bidwells LLP
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	The Consortium supports this policy and its ambition to conserve and enhance existing green infrastructure and ensure the provision of new green infrastructure to improve connectivity and access. However, the requirement at point 4 of this policy for Public Rights of Way to be enhanced and promoted is not considered to be justified, and may be unduly onerous in some circumstances.
Modifications requested	Suggested revisions to the wording are set out below. Proposed additional wording is shown in <i>italics</i> , and suggested omissions are shown struckthrough . Public Rights of Way(47) and access will be protected <i>and, where practical and feasible</i> , enhanced and promoted. New development should create convenient and attractive links within development and to the surrounding area, assist with creation of a network of accessible greenspace and provide links to public transport and walking and cycling networks.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	I reserve the right to appear prior to publication of the draft agendas that will set out the Inspector's matters and questions to form the basis of the discussions at the Hearings. The intention to appear is to seek to ensure that the Policy can be made sound.
Attachment(s)	
Consultation Point Title	Green Infrastructure
Consultation Point Number	Policy CC 11
Section of the Plan	Policy CC 11 Green Infrastructure
ID	LPS670
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met?	Yes

* Yes	
* No	
Do you consider the plan to be Sound?	Yes
* Yes	
* No	
Reason(s) not Sound	
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	We welcome the commitment to Enhanced Green Infrastructure (EGI) under point 3 and highlight the recommendation for an (EGI) audit as stated in the soon-to-be-adopted Norfolk GIRAMS.
Modifications requested	
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Green Infrastructure
Consultation Point Number	Policy CC 11
Section of the Plan	Policy CC 11 Green Infrastructure
ID	LPS795
Response Date	28/02/2022 14:38:00
Name	Mr Darl Sweetland
Organisation	Anglian Water
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	
* Yes	
* No	
Has the duty to cooperate been met?	
* Yes	
* No	
Do you consider the plan to be Sound?	Yes
* Yes	
* No	
Reason(s) not Sound	
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	SUPPORT: Anglian Water supports policy CC11 on Green Infrastructure and given the importance of aquatic habitats and leisure activities on or near water would welcome the use of the term Blue & Green Infrastructure either in the policy, supporting text or Glossary.
Modifications requested	
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Green Infrastructure
Consultation Point Number	Policy CC 11
Section of the Plan	Policy CC 11 Green Infrastructure

ID	LPS671
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>We welcome the commitment to Enhanced Green Infrastructure (EGI) under point 3 and highlight the recommendation for an (EGI) audit as stated in the soon-to-be-adopted Norfolk GIRAMS.</p> <p>Green Infrastructure GI should be part of the design process from the outset providing water management, habitat enhancements, access networks and open space. It should be bespoke to each site and discussed at the pre-application stage with the planning authority and relevant stakeholders. We propose that the audit informs delivery of strategic GI enhancement and creation.</p> <p>GI should coordinate:</p> <ul style="list-style-type: none"> • Water management policy, integrating Sustainable Drainage Systems (SuDS) into the design and where they are part of open space obligations, they should be safe and accessible creating an attractive aquatic setting for both people and nature • Habitat enhancement policy, to conserve and enhance onsite biodiversity and habitat networks within and adjacent to development sites • Access network policy to maintain and enhance the quality and connectivity of active travel routes linking foot and cycle paths to open space. • Open space Policy so that proposals meet quality and quantity standards for open space and be designed to cater for the needs of the local wildlife and community • Details of GI functions and maintenance requirements should be detailed, and the maintenance requirements funding arrangements and the party responsible for their long term delivery should be provided. <p>Green Infrastructure is central to the planning process and policy points should include requirement for monitoring and evaluation of new GI especially in the case of habitat creation. We strongly advise the safeguarding and provision of GI delivered through these policies.</p> <p>Your Authority may be aware that on the 7th December 2022 Natural England launched draft the GI Mapping tool and GI Principles. Good quality GI has an important role to play in our urban and rural environments. It's important for health and wellbeing, air quality, nature recovery and for delivering net zero targets, as well as for adapting to climate change by providing urban cooling and reducing flood risk. It can help to address issues of social inequality and environmental decline, whilst also making better places to live. We invite you to use these tools at the strategic and project level, further information can be found here: How Natural England's Green Infrastructure Framework can help create better places to live - Natural England (https://www.naturalengland.org.uk/2022/07/how-to-deliver-green-infrastructure-and-open-space/)</p> <p>Provision of open space We welcome the Council's proposal to improve and connect GI and support the requirement for development to contribute to the delivery of GI. We advise that Policy CC11 is referenced in development</p>

policies that have a requirement to deliver GI and/or have been identified as part of the GI study. It is Natural England's view that all new development should provide adequate and proportionate open space provision, either on-site within the development red line boundary or strategically within the district. Natural England support the provision of new open spaces and highlight that outdoor space should have:

- a range of sizes and locations as in accordance with Accessible Natural Greenspace Standards, a variety of natural and designed landscapes for everyone, with different functions to suit a diverse range of needs;
- opportunities for formal and informal play, exercise and rest that are accessible to all and with no segregation;
- well-integrated drainage, ecology, shading, recreation and food production that achieve a biodiversity net gain as required by the 25 Year Environment Plan;
- and well-considered maintenance and management regimes based on an understanding of the costs for occupants or users.

Further information about open space provision and design can be found in the Ministry of Housing, Communities and Local Government (MHCLG) National Design Guide (https://www.gov.uk/government/uploads/attachment_data/file/62131/national-design-guide.pdf)

Biodiversity net gain and nature recovery
 Biodiversity net gain and GI can also contribute to and be an integral part of the forthcoming Local Nature Recovery Network in Norfolk, delivering Local Authority contributions to wildlife and people, alongside the GI need. We recommend that strategic GI feeds into Local Nature Recovery Strategy as part of the continuum from urban to rural, driving a coordinated, practical and focussed action to help nature.

Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

3.12 Trees, Hedgerows & Woodland

Consultation Point Title	Trees, Hedgerows & Woodland
Consultation Point Number	3.12
Section of the Plan	3.12.5
ID	LPS633
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	<i>3.12.5 Harm to protected trees includes, but is not limited to, excessive pruning, incursion in the root protection area, alterations to ground levels or complete removal of the tree. Planning permission will only be granted where development would not conflict with the purposes of the preservation order of a tree, group of trees or woodland unless there is a substantiated justification.</i> This does not meet the "Effective" test of soundness. The Plan does not specify what counts as "substantiated justification". There is no way of knowing from this vague statement whether this would comply with national policy.
Modifications requested	The Plan needs to specify what counts as "substantiated justification".
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Trees, Hedgerows & Woodland
Consultation Point Number	3.12
Section of the Plan	3.12.3
ID	LPS632
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met?	

* Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	<p>3.12.3 Where new development is proposed the preference will always be to incorporate existing natural features into the development. In exceptional circumstances where the benefit of development is demonstrated to outweigh the benefit of preserving natural features, development will be permitted subject to adequate compensatory provision being made, of a suitable size and native species for the location, which is also of commensurate biomass and value to that which is lost.</p> <p>This does not meet the "Effective" test of soundness.</p> <p>This clause is too loose, giving too much room for manoeuvre. It does not give any indication of how this is to be judged: what are "exceptional circumstances where the benefit of development is demonstrated to outweigh the benefit of preserving natural features"? The replacement of an ancient oak with an oak sapling, or an existing hedge a row of whips, is in no way equivalent in either biodiversity or carbon capture and storage terms. There is no way of knowing from this vague statement whether this would comply with national policy.</p>
Modifications requested	The Plan needs to lay out what "exceptional circumstances" are. These do need to be truly exceptional.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Trees, Hedgerows & Woodland
Consultation Point Number	3.12
Section of the Plan	3.12.7
ID	LPS634
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	This is an excellent clause.
Modifications requested	

Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Consultation Point Title	Trees, Hedgerows & Woodland
Consultation Point Number	Policy CC 12
Section of the Plan	Policy CC 12 Trees, Hedgerows & Woodland
ID	LPS403
Response Date	07/03/2022 15:17:00
Name	Mr Will Wright
Organisation	ESCO Developments, Flagship Housing Group & Lovell Partnerships
Agent Name	Sarah Hornbrook
Agent Organisation	Bidwells LLP
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	The Consortium supports this policy and its ambition to retain existing trees and deliver new trees as part of development proposals. To assist in achieving this ambition, and to ensure compliance with Paragraph 35(c) of the NPPF, the requirement for replacement planting to be of 'comparable biomass' and of a 'comparable size' should be erased from the policy. The process of calculating/quantifying biomass can prove ambiguous, and site constraints may determine that replacement planting of a comparable size proves undeliverable. Retaining these elements within the policy risks rendering the policy ineffective, so they should be erased to ensure compliance with Paragraph 35(c) of the NPPF.
Modifications requested	Suggested revisions to the wording are set out below. Proposed additional wording is shown in <i>italics</i> , and suggested omissions are shown struckthrough . 2. Development that harms or requires the loss of a protected tree, hedgerow or woodland (i) will only be permitted in exceptional circumstances where the public benefit of the development would clearly outweigh the loss or deterioration of any tree, hedgerow or woodland. In such circumstances, adequate replacement provision, taking account of size, comparable biomass and suitable native species for the location; will be required.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	I reserve the right to appear prior to publication of the draft agendas that will set out the Inspector's matters and questions to form the basis of the discussions at the Hearings. The intention to appear is to seek to ensure that the Policy can be made sound.
Attachment(s)	
Consultation Point Title	Trees, Hedgerows & Woodland
Consultation Point Number	Policy CC 12
Section of the Plan	Policy CC 12 Trees, Hedgerows & Woodland
ID	LPS432

Response Date	07/03/2022 14:40:38
Name	
Organisation	Hopkins Homes
Agent Name	Mr Jake Lambert
Agent Organisation	Bidwells
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<u>This policy is unsound as it is considered ineffective</u> Hopkins Homes Ltd supports this policy and its ambition to retain existing trees and deliver new trees as part of development proposals. To assist in achieving this ambition, and to ensure compliance with Paragraph 35(c) of the NPPF, the requirement for replacement planting to be of 'comparable biomass' and of a 'comparable size' should be erased from the policy. The process of calculating/quantifying biomass can prove ambiguous, and site constraints may determine that replacement planting of a comparable size proves undeliverable.
Modifications requested	Retaining these elements within the policy risks rendering the policy ineffective, so they should be erased to ensure compliance with Paragraph 35(c) of the NPPF
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Trees, Hedgerows & Woodland
Consultation Point Number	Policy CC 12
Section of the Plan	Policy CC 12 Trees, Hedgerows & Woodland
ID	LPS635
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound	It is not effective

<ul style="list-style-type: none"> * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy 	
Explanation	<p>3. Harm or loss to any natural landscape feature will not be permitted unless a landscape strategy, which would compensate for the loss or harm, is secured or where the overriding benefits arising from the development outweighs the harm.</p> <p>This does not meet the "Effective" test of soundness.</p> <p>The Plan does not specify how this overriding benefit is to be judged. There is no way of knowing from this vague statement whether this would comply with national policy.</p>
Modifications requested	The Plan needs to be explicit, leaving no ambiguity for planning officers.
Appear at examination hearing session(s)? <ul style="list-style-type: none"> * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s) 	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Trees, Hedgerows & Woodland
Consultation Point Number	Policy CC 12
Section of the Plan	Policy CC 12 Trees, Hedgerows & Woodland
ID	LPS459
Response Date	07/03/2022 16:34:25
Name	
Organisation	Broadland Housing Association
Agent Name	Mr Jake Lambert
Agent Organisation	Bidwells
Do you consider the plan to be Legally Compliant? <ul style="list-style-type: none"> * Yes * No 	No
Has the duty to cooperate been met? <ul style="list-style-type: none"> * Yes * No 	Yes
Do you consider the plan to be Sound? <ul style="list-style-type: none"> * Yes * No 	No
Reason(s) not Sound <ul style="list-style-type: none"> * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy 	It is not effective; It is not justified
Explanation	<p><u>This policy is unsound as it is considered ineffective</u></p> <p>BHA supports this policy and its ambition to retain existing trees and deliver new trees as part of development proposals. To assist in achieving this ambition, and to ensure compliance with Paragraph 35(c) of the NPPF, the requirement for replacement planting to be of 'comparable biomass' and of a 'comparable size' should be erased from the policy. The process of calculating/quantifying biomass can prove ambiguous, and site constraints may determine that replacement planting of a comparable size proves undeliverable.</p>
Modifications requested	Retaining the elements within the policy identified in Question 5 risks rendering the policy ineffective, so they should be erased to ensure compliance with Paragraph 35(c) of the NPPF.
Appear at examination hearing session(s)? <ul style="list-style-type: none"> * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s) 	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	

Attachment(s)	
Consultation Point Title	Trees, Hedgerows & Woodland
Consultation Point Number	Policy CC 12
Section of the Plan	Policy CC 12 Trees, Hedgerows & Woodland
ID	LPS476
Response Date	07/03/2022 18:06:58
Name	
Organisation	Crisp Malting Group
Agent Name	Mr Jake Lambert
Agent Organisation	Bidwells
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<u>This policy is unsound as it is considered ineffective</u> CMG supports this policy and its ambition to retain existing trees and deliver new trees as part of development proposals. To assist in achieving this ambition, and to ensure compliance with Paragraph 35(c) of the NPPF, the requirement for replacement planting to be of 'comparable biomass' and of a 'comparable size' should be erased from the policy. The process of calculating/quantifying biomass can prove ambiguous, and site constraints may determine that replacement planting of a comparable size proves undeliverable.
Modifications requested	To ensure soundness, we wish to suggest the following amendment to Policy CC12: <i>Development that harms or requires the loss of a protected tree, hedgerow or woodland(1) will only be permitted in exceptional circumstances where the public benefit of the development would clearly outweigh the loss or deterioration of any tree, hedgerow or woodland. In such circumstances, adequate replacement provision, taking account of size, comparable biomass and suitable native species for the location, will be required.</i>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Trees, Hedgerows & Woodland
Consultation Point Number	Policy CC 12
Section of the Plan	Policy CC 12 Trees, Hedgerows & Woodland
ID	LPS673
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	

Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Natural England supports the retention of hedgerows and existing trees, specifically with regard to ancient woodland and veteran trees in line with paragraph 180 of the NPPF. Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. Natural England and the Forestry Commission have produced standing advice for planning authorities in relation to ancient woodland and ancient and veteran trees.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

3.13 Protecting Environmental Quality

Consultation Point Title	Protecting Environmental Quality
Consultation Point Number	3.13
Section of the Plan	3.13.8
ID	LPS336
Response Date	04/03/2022 14:27:24
Name	Miss Natalie Beal
Organisation	Broads Authority
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Comment Please also refer to the dark skies of the Broads here. Relevant part of the NPPF The Broads and the setting of the Broads is protected at NPPF paragraph 176 and the dark skies are protected at 185 c.
Modifications requested	Proposed change The Norfolk Coast Area of Outstanding Natural Beauty Partnership states as part of its 20 year vision that "the area will still be essentially unspoilt with a strong feeling of remoteness, peace and tranquillity, with wide skylscapes, seascaapes and dark night skies that show the richness and detail of constellations." (53) The Broads Authority also has intrinsically dark skies that are protected through its Local Plan. External lighting in new development should be limited to that necessary for security and consideration should also be given to ways of minimising light pollution using sensitive design details, for example, to avoid large glazed areas.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Protecting Environmental Quality
Consultation Point Number	3.13
Section of the Plan	3.13.8
ID	LPS636
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	

Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	<p>3.13.8 <i>The Norfolk Coast Area of Outstanding Natural Beauty Partnership states as part of its 20 year vision that "the area will still be essentially unspoilt with a strong feeling of remoteness, peace and tranquillity, with wide skylscapes, seascapes and dark night skies that show the richness and detail of constellations."</i> (53) <i>External lighting in new development should be limited to that necessary for security and consideration should also be given to ways of minimising light pollution using sensitive design details, for example, to avoid large glazed areas.</i></p> <p>This does not meet the "Effective" test of soundness.</p> <p>This is too vague, although there is better detail in 6.2.6.</p>
Modifications requested	It needs to include the CPRE lighting clause, and reference to "right light, right place, right time".
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

Consultation Point Title	Protecting Environmental Quality
Consultation Point Number	Policy CC 13
Section of the Plan	Policy CC 13 Protecting Environmental Quality
ID	LPS337
Response Date	04/03/2022 14:30:48
Name	Miss Natalie Beal
Organisation	Broads Authority
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>Comments on CC13 1 e The preceding sentence and this bullet read together don't read quite right. 'Proposals will need to comply with statutory environmental quality standards and demonstrate, individually or cumulatively, that the development would not give rise to adverse impacts on [inter alia] light and noise pollution'. It reads now, it says development should not adversely affect light and noise pollution. What I think you mean is that proposals should not give rise to noise and light pollution. But that is not what is written. You need to re-word this as it does not really work as written. Furthermore, given the Broads and AONB have dark skies in North Norfolk, I would have expected more on light pollution than a criteria combined with noise. Also, there is nothing really in the supporting text about what an applicant is meant to do with regards to light pollution – not to the detail of what to do if there is noise pollution.</p> <p>Relevant part of NPPF The Broads and the setting of the Broads is protected at NPPF paragraph 176 and it also has dark skies, as per para 185 c.</p> <p>Comment on CC13 3 This says a bit more on dark skies and light pollution, but is only written as a 'should' whereas part 4 uses the word 'must; and number 1 uses the word 'will'. What does using the word 'should' really mean? Why is light pollution and dark skies given a different wording, given all the supporting text says about the quality of dark skies?</p> <p>Relevant part of NPPF The Broads and the setting of the Broads is protected at NPPF paragraph 176 and it also has dark skies, as per para 185 c.</p>
Modifications requested	<p>Proposed change to the policy CC13 1 e</p> <ol style="list-style-type: none"> 1 the dark skies of the area, through addressing light pollution 2 noise pollution <p>Proposed change to supporting text Information about what the Council expects an applicant to do to show how they have addressed impact on dark skies.</p> <p>Proposed change CC13 3 'Proposals for development shouldmust minimise the impact on tranquillity and dark skies in North Norfolk and the adjoining Authorities' areas'.</p>
Appear at examination hearing session(s)?	No, I do not wish to participate in examination hearing session(s)

* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Protecting Environmental Quality
Consultation Point Number	Policy CC 13
Section of the Plan	Policy CC 13 Protecting Environmental Quality
ID	LPS637
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	
* Yes	
* No	
Has the duty to cooperate been met?	
* Yes	
* No	
Do you consider the plan to be Sound?	No
* Yes	
* No	
Reason(s) not Sound	It is not effective
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	<p>2. Exceptions will only be made where it can be clearly demonstrated that the environmental benefits of the development and the wider social and economic need for the development outweigh the adverse impact.</p> <p>This does not meet the "Effective" test of soundness.</p> <p>There is no definition of what would constitute sufficient benefit elsewhere to outweigh the adverse impact. There is no way of knowing from this vague statement whether this would comply with national policy.</p>
Modifications requested	The Plan needs to specify in what circumstances the benefits would outweigh the adverse impact.
Appear at examination hearing session(s)?	Yes, I wish to participate in hearing session(s)
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Protecting Environmental Quality
Consultation Point Number	Policy CC 13
Section of the Plan	Policy CC 13 Protecting Environmental Quality
ID	LPS638
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	

Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	3. <i>Proposals for development should minimise the impact on tranquillity and dark skies in North Norfolk and the adjoining Authorities' areas.</i> This does not meet the "Effective" test of soundness. This statement is too weak. There is no way of knowing from this vague statement whether this would comply with national policy.
Modifications requested	The Plan needs to specify what is an acceptable level of disturbance. In fact, it is our view that the word "tranquillity" implies no disturbance. The AONB's characteristics are tranquillity and remoteness, both of which would be damaged by development within the area.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Protecting Environmental Quality
Consultation Point Number	Policy CC 13
Section of the Plan	Policy CC 13 Protecting Environmental Quality
ID	LPS796
Response Date	28/02/2022 14:38:00
Name	Mr Darl Sweetland
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	SUPPORT: Anglian Water supports policy CC13 on Protecting Environmental Quality and specifically 1.d. on water quality.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	

Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Protecting Environmental Quality
Consultation Point Number	Policy CC 13
Section of the Plan	Policy CC 13 Protecting Environmental Quality
ID	LPS674
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>Not Sound – Inclusion of European and nationally designated sites in line with Paragraphs 174 and 185 of the NPPF. Suggestion that consideration for likely significant effects on sites is made in relation to air quality, noise and light pollution.</p> <p>We support the policy's attention to the impacts of air quality, light and noise pollution on the natural environment and AONB. However, Natural England recommends that specific consideration should be made to European and nationally designated sites and the potential for impacts on the integrity of site features.</p>
Modifications requested	<p>In line with paragraphs 174 and 185 of the NPPF, and the plan's HRA, we advise that the policy addresses the impacts associated with new development on European sites and SSSIs, particularly nitrogen emissions as result of increased traffic generation and air quality and pollution concerns during construction. We recommend that Policy ENV6 is referenced in Policy CC13 to ensure air quality and pollution concerns are addressed.</p> <p>The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. We consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic¹, which feature habitats that are vulnerable to nitrogen deposition/acidification. APIS provides a searchable database and information on pollutants and their impacts on habitats and species.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Protecting Environmental Quality
Consultation Point Number	Policy CC 13

Section of the Plan	Policy CC 13 Protecting Environmental Quality
ID	LPS756
Response Date	07/02/2022 17:11:00
Name	Ms Susie Cunningham
Organisation	Catfield Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>The Council welcomed the "Plans" extensive coverage of nature conservation and the requirement to subject the "Plan" to the test of a Habitats Regulations Assessment. However, it considered that the protection of the Broads SAC might currently not be being best served by the split in planning responsibility between the Broads Authority Planning Department and that of North Norfolk District council.</p> <p>It is instructive that in the "Plan" there is much more emphasis on the protection of the North Norfolk Coast, in itself a worthy aim, than the preservation for future generations of the unique ecosystems of the Broads. These are particularly at risk from threats to water quality and quantity of their life supporting water supply as was recently demonstrated in the test case Catfield Fen Public Inquiry in 2016 and the subsequent Restoring Sustainable Abstraction Programme for the Ant Broads and Marshes which was published by the Environment Agency in June 2021.</p> <p>The practical and potentially adverse consequences of the split planning responsibilities mentioned above have been highlighted by the following two recent planning applications:</p> <ul style="list-style-type: none"> • PF/21/1749 Affordable houses, South of Lea Road, Catfield • PF/20/1800 BM Composites, Station Nurseries, Sutton Road, Catfield <p>Both proposals are for sites in close proximity to the Broads SAC and with recognised potential threats from water pollution. Simply put the threat is that water pollution from an area for which North Norfolk is responsible will only become evident in the immediately adjacent Broads Authority area.</p> <p>Yet in neither case was consultation sought by North Norfolk Planning from Broads Authority Planning.</p>
Modifications requested	The Catfield Parish Council recommend that the "Plan" be amended to recognise fully the role of North Norfolk District Council in protecting the Broads and how it intends to work more closely with the Broads Authority to that end.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	Failure to address the special issues facing the settlements in and adjoining the Heritage and Undeveloped Coast area.
Modifications requested	Para. 4.1.1: the Spatial Strategy is unsound as it fails to provide a context or framework to address the special circumstances of the settlements adjoining the Heritage and Undeveloped Coast in the far west of the District, namely the exceptionally high housing prices and second and holiday home ownership, which gives rise to the need to provide housing for primary local residency, rather than to simply meet overall targets.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Spatial Strategy
Consultation Point Number	4
Section of the Plan	Policies Map SS1 Settlement Boundary (High Kelling)
ID	LPS308
Response Date	03/03/2022 09:15:02
Name	
Organisation	White Lodge (Norwich) Ltd
Agent Name	Mr Sam Hazell
Agent Organisation	Lawson Planning Partnership Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	SEE ATTACHED FILE The Plan is unsound when considered against the related tests set out in paragraph 35 of the NPPF (2021) as explained below.

	<ul style="list-style-type: none"> • Not Positively prepared– the proposed Small Growth Village Strategy approach will not provide enough homes of the right type in the right places for a growing population to meet the area’s needs (including affordable) and could frustrate the delivery of sustainable housing development. • Not Justified– the strategy is not appropriate, taking into account the reasonable alternative to allocate suitable and available sites in Small Growth Villages, and is not based on proportionate evidence. • Not Effective– the plan does not provide landowners/ developers with sufficient planning certainty and will not therefore, deliver the required development, including affordable housing, in Small Growth Villages over the plan period. • Not Consistent with National Policy– The proposed Small Growth Village Strategy approach will not deliver sufficient homes, nor support community vitality & services viability, it will not therefore enable the delivery of sustainable development in rural areas. This approach would run counter to para 78 which states, “In rural areas, planning policies and decisions should be responsive to local circumstances and support housing development that reflect local needs”, and para 79, “To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.” <p>Settlement boundaries are an established policy tool for managing development and growth. The Settlement Boundary Review (Small Growth Villages) Topic Paper (January 2022) published to support Reg 19 Publication, contains details of the Council’s approach to the identification of settlement boundaries in Small Growth Villages. The proposed Settlement Boundary for High Kelling is carried over from the adopted North Norfolk Local Plan 1998, to which no changes are proposed.</p> <p>Notwithstanding our objections to the approach and wording of Policy SS1 set out separately, we OBJECT to the proposed Settlement Boundary for High Kelling because it is not justified based on proportional evidence relating to the logical current built up area of the village. Furthermore, it will not provide for enough homes of the right type in the right places for a growing population to meet the area’s needs, support community vitality and services viability, and enable the delivery of sustainable development in rural areas, as set out in detail in the representations letter dated 1st March 2022, attached.</p> <p>Please also see separate representations which request changes to the approach and detailed wording of Policy SS1, Policy HOU1, Policy HOU2, Policy HC4, Policy E6, and Policy DS1, which provide further justification in support of our representations on the Plan which should be read as a whole.</p>
<p>Modifications requested</p>	<p>SEE ATTACHED FILE</p> <p>In order to make the Plan sound and to reflect the functional and visually identifiable nature of development to the south of the A148 Cromer Road, which forms an integral part of the village and should therefore be included in the settlement boundary, the settlement boundary for High Kelling should be amended to include land at the Former Four Seasons Nursery, as shown on the LPP Proposed Settlement Boundary Plan, attached.</p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>Justification for appearing at hearing</p>	<p>In accordance with our legal right to appear before and be heard by the inspector at the hearing. We wish to elaborate on our representations, which set out the changes we have requested to the strategy approach and the identified interrelated policies that are required to make the plan sound.</p>
<p>Attachment(s)</p>	<p>176_HighKelling_Reg19.Reps.Letter.FINAL_1.3.22.pdf (7) FINAL LPPRepslett WhiteLodge NNLP 18.06.19.pdf (7)</p>

4 Spatial Strategy

Consultation Point Title	Spatial Strategy
Consultation Point Number	4
Section of the Plan	4 - Spatial Strategy
ID	LPS452
Response Date	07/03/2022 15:57:57
Name	Kavir Mahil
Organisation	Colegate Management
Agent Name	Kavir Mahil
Agent Organisation	WSP UK
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	SEE ATTACHED FILE Please refer to our attached representations, which contain comments made on behalf of Colegate Management to the Draft Proposed Submission Version Local Plan. Colegate Management control a significant portion of land around Sculthorpe. We have previously promoted said land through the Call for Sites and Regulation 18 consultation. Our representations strongly question the soundness of the Plan in relation to the approach to Small Growth Villages and Sculthorpe in particular. The proposed spatial strategy is not positive or justified in the context of the need to deliver homes, for the reasons set out in the attached representations.
Modifications requested	SEE ATTACHED FILE Please see attached representations for modifications to draft Policy SS1.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	We wish to reserve our right to appear at the future Examination of the Proposed Submission Version Local Plan in order to discuss the content of our representations. We anticipate there will be detailed discussion on the Plan's approach to housing delivery and spatial distribution. As a significant land owner in Sculthorpe and a objector to the Plan's spatial strategy to Small Growth Villages, it is important to allow for attendance at these discussions.
Attachment(s)	Representations Colegate Management NNDC Reg 19.pdf
Consultation Point Title	Spatial Strategy
Consultation Point Number	4
Section of the Plan	4.1.1
ID	LPS122
Response Date	24/02/2022 16:18:37
Name	Mr. John Edwards

4.1 Spatial Strategy

Consultation Point Title	Spatial Strategy
Consultation Point Number	4.1
Section of the Plan	4.1.7
ID	LPS104
Response Date	18/02/2022 14:46:34
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	<p>There are concerns in my ward about teh designation of Small Growth Village and it's implications. This relates to the likelihood of new homes being bought as second or holiday homes and therefore not adding to teh housing supply for locals. Small growth villages do not have adequate services and their geography often means new housing would be peripheral and therefore not sustainable. Services are often minimal.</p> <p>There is also concern in Coastal Ward regarding Large Growth Village allocations which are likely to be bought as second or holiday homes.</p> <p>There further concern regarding the infrastructure such as parking, and health care, in Small Growth Towns serving Coastal Ward, in that it is inadequate without the new housing which impacts on surrounding villages as well as residents of the town itself.</p>
Modifications requested	<p>Small growth villages in Coastal Ward should either be removed or the new home allocation reduced to say 3%. Principal residency restrictions shd be imposed.</p> <p>For Large GrowthVillages in Coastal Ward, principal residency shd be imposed on new dwellings.</p> <p>For Small Growth Towns, additional infrastructure must be in place before development starts in order not to disadvantage those in surrounding villages.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Spatial Strategy
Consultation Point Number	4.1
Section of the Plan	4.1.9
ID	LPS177
Response Date	23/02/2022 12:57:09
Name	
Organisation	Firs Farm Partnership

Agent Name	Ms Beccy Rejzek
Agent Organisation	Lanpro
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	SEE ATTACHED FILE Spatial Strategy The proposed settlement hierarchy set out at 4.1.1 to 4.1.8 is generally supported and considered sound. In particular, the identification of Small Growth Villages and the recognition that although these may have a limited number of services, they none the less provide an important element of the Settlement Hierarchy and provision should therefore be made for a proportion of total growth across these villages. In addition to its own limited services, Sutton benefits from its very close proximity to Stalham which provides a wide range of shops, services and education provision. Stalham is within 1km of Sutton and it is, therefore, wholly appropriate that Sutton is identified as a Small Growth Village capable of supporting residential development. Small Growth Village Strategy Paragraph 4.1.9 explains that the strategy provides for approximately 6% growth in any identified Small Growth Village from the date of adoption of the Plan delivered via a process of infill developments within a defined settlement boundary and developments adjacent to the boundary which meet the specified policy criteria. For Sutton this means an indicative allowance of 30 dwellings as shown at Table 2. It is understood from this that the 'allowance' is not a specific maximum number not to be exceeded, but rather provides for development in the range of approximately 30 dwellings or 6% growth. It would be more effective if paragraph 4.1.9 could provide clarity on this.
Modifications requested	SEE ATTACHED FILE Amend paragraph 4.1.9: The indicative dwelling allowances set out a Table 2 are not intended as maximums not to be exceeded but as approximate suitable numbers for each village listed.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	In order to be able to explain the reasoning for the proposed change clearly to the Inspector and to answer any questions.
Attachment(s)	Regulation 19 Reps, Firs Farm Partnership 23.02.2022.pdf (1)
Consultation Point Title	Spatial Strategy
Consultation Point Number	4.1
Section of the Plan	SS1 All Paragraphs, SS2 All paragraphs
ID	LPS54
Response Date	04/02/2022 18:08:00
Name	Mr Edward Witton
Organisation	
Agent Name	

Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively preparedIt is not consistent with national policy
Explanation	SEE ATTACHED FILE
Modifications requested	SEE ATTACHED FILE
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	Objection 04022022.docx

Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS47
Response Date	09/02/2022 16:06:06
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	<p>Para 3 - for small growth villages allowing small residential developments up to 6% of existing number of dwellings is not sustainable. These dwellings would often abut the village boundary so access to the village wd be along a (usually) unsafe country road, no doubt by car. The likelihood is that these houses will become second homes, thereby not contributing to the year round well-being of the village or the local housing need.'</p> <p>Some designated small growth villages seem to have marginal amenities and therefore the classification seems inappropriate. Is it possible to review the designation of such villages?' inappropriate given the amenities within the village'</p>
Modifications requested	<p>Para 3 - for small growth villages residential developments should be smaller, say 3%. and within the settlement boundary. Primary residence requirements should be applied to all market dwellings.</p> <p>The designation of those small growth villages with marginal amenities should be reviewed and, if appropriate, changed'</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS1 Spatial Strategy
ID	LPS151
Response Date	22/02/2022 17:06:00
Name	Mr Michael Rayner
Organisation	CPRE Norfolk
Agent Name	
Agent Organisation	

Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	<p>3b We are concerned about what the process would be if more than one application was to be lodged for the same Small Growth Village at roughly the same time. Without clear policy detail on how the numbers of new housing would be managed under such circumstances we feel this would be unsound. It is possible that multiple applications could be lodged for the same settlement which could lead to the scale of growth being greater than intended.</p> <p>3c CPRE Norfolk contends that “small scale” and “incremental growth” need to be tightly defined, otherwise these terms could be taken to mean different things to different people, which could lead to problems for decision-makers and potentially at appeal.</p> <p>3f CPRE Norfolk fully supports this clause, which hopefully will help to ensure sites for affordable social housing will continue to be offered for development outside but abutting settlement boundaries.</p>
Modifications requested	<p>Point 3 of Policy SS 1 should be removed, so that no growth would be allowed outside the boundaries of small growth villages under this policy.</p> <p>If the Policy remains, point 3b needs to be reconsidered to give greater certainty to no more than the proposed number of new dwellings being permitted under this policy.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS158
Response Date	25/02/2022 17:06:00
Name	James Nobbs Flagship Homes
Organisation	Flagship Homes
Agent Name	Mr John Long
Agent Organisation	John Long Planning Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No

<p>Reason(s) not Sound</p> <ul style="list-style-type: none"> * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy 	<p>It is not justified; It is not consistent with national policy</p>
<p>Explanation</p>	<p>SEE ATTACHED FILE</p> <p>Flagship Homes have an interest in an area of land at Bacton (east of the B1159 Coast Road/land adj. Beach Road, Bacton). The land is allocated for residential development and open space in the current Local Plan (site allocations DPD – BACT03 - see attachment).</p> <p>The allocation has not been carried forward into the emerging Local Plan and the village appears to have been downgraded from a Coastal Service Village capable of accommodating allocated growth (market and affordable homes) to a Small Growth Village capable of accommodating only infill and small scale incremental growth adjacent to the Settlement Boundary.</p> <p>Flagship Homes are concerned that a scheme envisaged by the current Local Plan, which aims to support the village's vitality and allow it to thrive would not be supportable given the very restrictive approach set out in Policy SS 1 for Small Growth Villages. Flagship Homes considers that Bacton is a suitable location for medium scale growth (of both market and affordable homes) as envisaged in the current Local Plan (Site Allocations DPD – BACT03), particularly given the range of services, facilities and employment opportunities in the settlement and nearby and also importantly that it is within a low flood risk zone.</p> <p>Flagship Homes considers that the scale of growth envisaged in the current Local Plan (Site Allocations DPD – BACT03) provides a greater opportunity for residents in the North Norfolk coastal area affected by flood risk and coastal erosion to relocate to new homes (market and affordable) in a nearby coastal settlement, as well as meeting local needs. This opportunity would be somewhat restricted by the emerging Policy SS 1, which would severely limit the type of development that could come forward and could result in less affordable housing being provided than would be the case with the current Local Plan approach.</p> <p>The Policy does not clearly define what 'small scale' development constitutes, which is a further concern. Flagship Homes are uncertain whether 'small scale' means any size/type of scheme that does not qualify as a 'Major Development' as defined by the draft Local Plan (section 6.8.12 and Glossary) and NPPF, or if it is defined as something different (Annex 2 Glossary).</p> <p>Flagship Homes also have concerns over how the 6% growth limit will be managed SS 1 criterion 3 b). Para 28.0.6 of Appendix 4 of the emerging Local Plan (Growth Levels in Small Growth Villages) suggests that in the event that two or more applications awaiting determination at the same time, priority will be given to the application which is registered at the earliest date. This does not seem good planning and could lead to a 'gold rush' of sites being submitted to seek to ensure they are the first in line, and site proposals being determined by the Authority on the basis that they were submitted first rather than on the individual merits of a particular proposal.</p> <p>This could result in the less than most appropriate scheme(s) being approved. It could also mean that a number of small sites are brought forward below the national threshold and/or the SS 1 policy threshold for affordable housing (0.25 hectares) and the 6% growth figure could be met without any affordable housing being provided in the village. Whilst it is noted that rural exceptions housing would be excluded from the calculations, there are no guarantee that landowners will be willing to release land for rural exceptions housing even where there are willing developers to deliver such homes.</p> <p>Flagship Homes suggests that if the Council want to see a mix of market and affordable housing being provided in small villages such as Bacton, then existing allocations should be 'rolled forward' into the emerging local plan, which will provide more certainty of delivery of homes, including affordable homes.</p> <p>Flagship Homes are also concerned over the definition of Bacton's settlement boundary, which excludes development that is clearly part of the built up area of the village (including holiday parks and other residential areas). Paragraph 9.1.4 of the emerging Local Plan suggest that '...the settlement boundaries distinguish between development land which are already largely built up in character from the surrounding undeveloped areas'. Clearly the excluded areas are not undeveloped and do not reflect the characteristics of Countryside and should be included within Bacton's Settlement Boundary. The Plan could include</p>

	<p>a further Policy Area designation related to holiday/tourism accommodation in settlements, if there are concerns over the management of development in such areas.</p> <p>In conclusion, Flagship Homes considers that the emerging Local Plan Policy SS 1 fails the justified test as it is not an appropriate strategy and fails to take into account reasonable alternatives (i.e to continue to allocate land for development in villages such as Bacton). It also fails the consistent with national policy test as it may not result in housing developments in rural areas that reflect local needs (section 79 of the NPPF); it does not identify opportunities for villages to grow and thrive (section 80 of the NPPF) which would best be done by specifically allocating land for such development. Furthermore, It is also unclear, and does not indicate/confirm the level of growth that would be considered 'small scale' in the context of Small Growth Villages which would be supported by the policy.</p>
Modifications requested	<p>SEE ATTACHED FILE</p> <p>To make the Local Plan sound:</p> <ol style="list-style-type: none"> 1 Existing allocations in the current Local Plan (Site Allocations DPD) in villages including Bacton should be rolled over and included in the emerging Local Plan, where landowners/promoters are able to confirm intentions to deliver housing as is the case with BACT03; 2 Policy SS 1 (or its reasoned justification/supporting text) should provide an indication of the scale of growth that would meet the definition of 'small scale' in the context of Small Growth Villages; 3 The Settlement Boundary for Bacton should be redrawn to include all of the village's developed/built up area, including adjacent tourism accommodation sites.
<p>Appear at examination hearing session(s)?</p> <p>* No, I do not wish to participate in examination hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To discuss the emerging Local Plan's shortcomings in terms of residential development in Bacton.
Attachment(s)	Bacton Pages from site_allocations_plan_-web.pdf
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS1 Spatial Strategy
ID	LPS178
Response Date	23/02/2022 13:11:09
Name	
Organisation	The Firs Farm Partnership
Agent Name	Ms Beccy Rejzek
Agent Organisation	Lanpro
<p>Do you consider the plan to be Legally Compliant?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Has the duty to cooperate been met?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Do you consider the plan to be Sound?</p> <p>* Yes</p> <p>* No</p>	No
<p>Reason(s) not Sound</p> <p>* It is not positively prepared</p> <p>* It is not effective</p> <p>* It is not justified</p> <p>* It is not consistent with national policy</p>	It is not effective; It is not justified
Explanation	<p>SEE ATTACHED FILE</p> <p>Policy SS1</p>

	<p>With regard to section 3, relating to residential development outside of the defined boundaries of Small Growth Villages, we have the following comments on the detailed criteria:</p> <p>e) requires that “the proposal incorporates substantial community benefits, including necessary infrastructure and service improvements and improved connectivity to the village and wider GI network”.</p> <p>We consider that this is too specific and restrictive. There are other community benefits in addition to those identified in the wording as must be included. It might not be appropriate, or necessary for all sites to deliver improved connectivity to the village and wider GI network and some sites might be able to provide alternative valuable community benefits.</p> <p>f) requires that “in the case of sites in excess of 0.25 hectares, the site, together with any adjacent developable land, has first been offered to local Registered Social Landlords on agreed terms which would allow its development for affordable homes, and such an offer has been declined.”</p> <p>We consider that this is an unnecessarily onerous requirement that will be difficult to comply with and represents a barrier to the delivery of new homes. The requirements are vague and do not provide site owners, or potential developers with either certainty or clarity. For many, this will be too difficult and not worthwhile pursuing. Our concerns are:</p> <ul style="list-style-type: none"> • It is unclear what the offer of the site ‘together with any adjacent land’ means and whether it is intended to refer to land within the same ownership. • It is unclear how a site owner is required to agree making such an offer with adjacent land owners. • It is unclear what an offer ‘on agreed terms’ means and who the agreement is intended to be between. • It is unclear how local registered Social Landlords are proposed to be identified and how many this should involve. • It is unclear what evidence is expected to be provided to demonstrate compliance. <p>Demonstrating compliance with criterion f) could be a time consuming process, and with no clear guidelines on how it is actually to be done, it will be difficult to provide appropriate evidence, which will deter some potentially suitable sites from being put forward.</p> <p>Active Registered Social landlords will already be focussing their own site finding investigations on settlements where they are potentially interested in acquiring sites. Therefore, it is considered unnecessary and burdensome for site owners/potential developers to be required to undertake the above.</p>
Modifications requested	<p>SEE ATTACHED FILE</p> <p>In order to ensure that Policy SS1 is effective, we suggest the wording should be amended as follows:</p> <p><i>“e) The proposal incorporates substantial community benefits, such as but not limited to, infrastructure and service improvements or improved connectivity to the village and wider GI network; and,”</i></p> <p>We request criterion f) of Policy SS1 should be deleted in order to ensure that the policy is effective.</p>
<p>Appear at examination hearing session(s)?</p> <p>* No, I do not wish to participate in examination hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
Justification for appearing at hearing	<p>In order to be able to clearly explain the reasons for the required changes to the Inspector and to answer any questions.</p>
Attachment(s)	<p>Regulation 19 Reps, Firs Farm Partnership 23.02.2022.pdf (2)</p>
Consultation Point Title	<p>Spatial Strategy</p>
Consultation Point Number	<p>Policy SS 1</p>
Section of the Plan	<p>Policy SS 1 Spatial Strategy</p>
ID	<p>LPS198</p>
Response Date	<p>23/02/2022 18:46:00</p>
Name	<p>Miss Donna Clarke</p>

Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	Melton Constable should not be attached to Briston if it is Briston that is defined as the growth village.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS196
Response Date	23/02/2022 18:35:18
Name	Miss Donna Clarke
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Great Ryburgh should be considered a small growth village.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS322
Response Date	03/03/2022 18:36:00
Name	
Organisation	Kelling Estate LLP
Agent Name	Roger Welchman
Agent Organisation	Armstrong Rigg Planning
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	<p>SEE ATTACHED FILE</p> <p>Explanation of recommended amendments to policy SS1</p> <p>By way of explanation of the aforementioned proposed amendments to policy SS1, comments on part 1 of the policy are to bring its content in line and make it consistent with national policy, NPPF paragraph 177.</p> <p>In respect of part 3 amendments these are needed for the following reasons:</p> <p>Part B. The 6% figure across all small growth villages is both an arbitrary measure and crude, blunt means of apportioning growth which is inconsistent with the onus which both national and local planning policy (in the form of the aspirations of the draft Local Plan) places on achieving sustainable development. The approach proposed disregards the suitability of locations where development can sustainably accommodate more development or any sort of qualitative assessment of the deliverability of sites in the respective settlements. For these reasons and to provide certainty we would strongly advocate the allocation of deliverable sites of sufficient number and size to fulfil this important element of the overall housing requirement.</p> <p>Nevertheless if the approach proposed is pursued the amendments shown above will not be vulnerable to the very real threat that some settlements through a variety of potential factors, such as lack of deliverable sites and/or environmental constraints will deliver either no or very few dwellings, so as to undermine a key objective of the plan, that of housing delivery.</p> <p>Part C. The deletion of the words <i>small scale, incremental growth</i> are necessary to ensure the policy is positively prepared, effective and consistent with national policy. The words are vague, unduly restrictive and could serve to undermine the plans objective of meeting objectively assessed needs, undermine its effectiveness and frustrate the delivery of sustainable development.</p> <p>Part E. The words to be deleted from the policy are ill-defined, vague and unduly onerous and serve to undermine the effectiveness of the policy. To assist the reader in understanding what development proposals will need to include, clarity is needed citing clear positive and justified objectives.</p> <p>Part F. We consider the criteria needs to be deleted in its entirety. The wording incentivises the delivery of only very small sites, less likely to deliver the level of housing needed and could undermine the sustainability of development proposals by bringing forward developments on a small, piecemeal basis to avoid the need to first offer otherwise qualifying sites to RSL's. This runs contrary to the objective of the criteria, namely the delivery of affordable housing, but</p>

	also threatens housing delivery. Furthermore the policy criteria overlaps with other policies in the draft Plan (HOU2 and HOU3) intended to guide the delivery of affordable housing. It is therefore neither positively prepared, justified, effective or consistent with national policy.
Modifications requested	<p>SEE ATTACHED FILE</p> <p>Policy SS1 Spatial Strategy – Recommended Amendments</p> <ol style="list-style-type: none"> <i>The majority of new development will be located in the larger towns and villages in the District having regard to their role as employment, retail and service centres, the identified need for new development and their individual capacity to accommodate sustainable growth. Where sustainable alternatives are available, Major development will not be permitted in the North Norfolk Coast Area of Outstanding Natural Beauty other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Development will be located where it minimises the risk from flooding and coastal erosion and mitigates and adapts to the impacts of climate change.</i> No comment Outside of the defined boundaries of Small Growth Villages residential development will be permitted only where all of the following criteria are satisfied: <ol style="list-style-type: none"> <i>The site immediately abuts the defined Settlement Boundary;</i> <i>The number of dwellings combined with those already approved since the date of adoption does not increase the numbers of dwellings in the defined settlement by usually across all of the Small Growth Villages equates to around more than 6%;XXX* dwellings; as outlined in Table 2 ‘Small Growth Villages Housing Apportionment’.</i> <i>The proposal is small scale, incremental growth compatible with the form and character of the village and its landscape setting in terms of siting, scale, design, impact on heritage assets and historical character; and</i> <i>Safe and convenient access can be provided; and</i> <ol style="list-style-type: none"> <i>The proposal incorporates substantial community benefits which may include (as examples); including necessary infrastructure and service improvements, and improved connectivity to the village and wider GI network, or an uplift in affordable housing above the requirement set out in Policy HOU2 where it meets a demonstrable need.;and</i> <i>In the case of sites in excess of 0.25 hectares, the site, together with any adjacent developable land, has first been offered to a Registered Social Landlord on agreed terms which would allow its development for affordable homes, and such an offer has been declined.</i> <p><i>*Figure to be determined as a proportion of the overall residual growth required by the plan</i></p>
Appear at examination hearing session(s)?	Yes, I wish to participate in hearing session(s)
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	3. Policy SS1 - Representation to Regulation 19 Version of North Norfolk Local Plan.pdf
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS266
Response Date	28/02/2022 12:31:00
Name	Mr Michael Filby
Organisation	
Agent Name	Ms Lois Partridge
Agent Organisation	Swords

Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified; It is not consistent with national policy
Explanation	<p>Policy SS1 – Spatial Strategy – proposes a criteria based policy which allows for development within the settlement boundaries of Small Growth Villages, and sets out a range of criteria which must be met to allow development outside of the settlement boundary of Small Growth Villages. These criteria are:</p> <ol style="list-style-type: none"> 1 a) The site immediately abuts the defined Settlement Boundary; 2 b) The number of dwellings combined with those already approved since the date of adoption does not increase the numbers of dwellings in the defined settlement by usually more than 6% as outlined in Table 2 'Small Growth Villages Housing Apportionment' and, 3 c) The proposal is small scale, incremental growth compatible with the form and character of the village and its landscape setting in terms of siting, scale, design, impact on heritage assets and historic character; and, 4 d) Safe and convenient access can be provided; and, 5 e) The proposal incorporates substantial community benefits, including necessary infrastructure and service improvements and improved connectivity to the village and wider GI network; and, 6 f) In the case of sites in excess of 0.25 hectares, the site, together with any adjacent developable land, has first been offered to local Registered Social Landlords on agreed terms which would allow its development for affordable homes, and such an offer has been declined. <p>Table 2 identifies that under this policy, 6% growth would equate to the development of 24 new homes in Roughton over the Plan period. We contend that the requirements of the policy are so onerous as to make it virtually impossible for new market housing to be brought forward in Small Growth Villages. In particular, criteria e) and f) (set out above) effectively prevent the majority of small site sites being delivered, even if they are in all other ways deliverable, and would fulfil criteria a) – d).</p> <p>Criterion c) of the policy specifically refers to the fact that proposals should be small scale, but then criterion e) requires that substantial community benefits are delivered. It is not clear what those benefits may be, but we would suggest that such a requirement is very likely to render a small site unviable. If only a few houses are being delivered, but 'substantial' land/buildings/financial contributions are expected to be delivered, this is likely to deter proposals for much needed new housing, or impact on the ability to deliver planned housing.</p> <p>Criterion f) requires that sites should first have been offered to RSLs. Offering a site to a RSL on terms which would allow development for affordable housing is likely to result in a disproportionate number of affordable housing schemes coming forward, and to prevent market housing from being delivered. This is likely to result in very few market housing sites coming forward, reducing choice and removing the opportunity for new families to move into smaller villages.</p> <p>The proposed criteria based policy is therefore neither positively prepared, nor consistent with national policy, as set out in the National Planning Policy Framework (NPPF).</p> <p>Paragraph 79 of the NPPF states that:</p> <p><i>'Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.'</i></p> <p>The Plan as drafted is not consistent with this approach. Roughton has a range of local services, including a primary school and a GP</p>

	<p>surgery, secondary services, including a Post Office, a public house and meeting place, and a petrol filling station and a place of worship. Roughton also lies only 3.2 miles south of Roughton Road railway station, which provides train services to Norwich. Bus stops in Roughton on the A140 provide easy access by bus to Cromer, which is located 3.7 miles to the north. North Walsham is only 6.5 miles away, and Norwich 19.6 miles.</p> <p>However, the provisions of Policy SS1 create a barrier to the ability of Roughton to grow and thrive. The combination of a lack of allocations in the Plan and a criteria based policy which is extremely onerous will effectively prevent growth and investment in the village, and in other Small Growth Villages.</p> <p>In summary, it is considered that the requirements of Policy SS1 in relation to potential development at Small Growth Villages are neither positively prepared nor consistent with national policy, and this element of the Plan is, as such, unsound.</p>
Modifications requested	It is suggested that criteria e) and f) should be removed from Policy SS1, to provide a more positive policy context for small scale development to come forward adjacent to the settlement boundary of Small Growth Villages.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS216
Response Date	24/02/2022 11:31:00
Name	C & S Norfolk Ltd
Organisation	C&S Norfolk Ltd
Agent Name	Ms Gabrielle Rowan
Agent Organisation	Pegasus Group
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	SEE ATTACHED FILE Please see attached comments (ref: P19-1073-NNLP Reg 19 Reps-February 2022)
Modifications requested	SEE ATTACHED FILE Please see attached comments (ref: P19-1073-NNLP Reg 19 Reps-February 2022)
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)

Justification for appearing at hearing	
Attachment(s)	P19-1073-NNLP Reg 19 reps- February 2022.pdf
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS265
Response Date	28/02/2022 12:24:00
Name	Mr Michael Filby
Organisation	
Agent Name	Ms Lois Partridge
Agent Organisation	Sworders
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified; It is not consistent with national policy
Explanation	<p>Roughton is defined in the Plan as a Small Growth Village. At the Regulation 18 draft Plan consultation stage, we understood that there would be a further consultation on proposed allocations of sites of up to 20 units at Small Growth Villages. It is therefore very disappointing to note that in Policy SS1 of the Regulation 19 document, the proposal to allocate sites for development has been removed, and there are no proposed residential allocations in this tier of settlement.</p> <p>It is considered that in such a rural District as North Norfolk, which has 23 Small Growth Villages, the lack of allocations in these villages weakens the Spatial Strategy and does not represent positive planning. Paragraph 4.1.7 of the Plan acknowledges that, in respect of Small Growth Villages:</p> <p><i>'they provide an element of day to day services and growth at an appropriate scale that reflects the character of the villages, has the potential to aid their vitality and the viability or existing services.'</i></p> <p>However, by not allocating sites for development in these villages in Policy SS1, the Plan does not recognise the potential of these villages to deliver small scale growth, it reduces certainty about new development for residents, and it ignores the needs of villages to grow, to enable them to continue to provide local services.</p>
Modifications requested	Policy SS1 should allocate sites for residential development adjacent to Small Growth Villages
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS205
Response Date	23/02/2022 23:04:30

Name	Mrs Gemma Harrison
Organisation	Cley Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	Cllrs object to the growth allocated to small growth villages. Although in principle Cllrs welcome the opportunity for affordable houses in small growth villages in reality it is feared any new housing in these villages will go to second holiday homes. Cllrs want to see a robust policy included in the Local Plan to prevent future holiday homes and protect housing stock for local families.
Modifications requested	Amend policy to reduce growth for small growth villages and look at adding a policy to protect housing stock for locals / prioritise local people for new housing stock.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS242
Response Date	24/02/2022 15:47:00
Name	Brown & Co and Corylus
Organisation	
Agent Name	Julia Edwards
Agent Organisation	Brown & Co. and Corylus Planning & Environmental Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not consistent with national policy
Explanation	(Plan page 64) Policy SS1 – Item 1 – 2nd sentence

	We understand the wish to protect the AONB, however the second sentence, as written in Policy SS1, Item 1 is not clear nor entirely consistent with that in Policy ENV1. We consider that the wording in ENV1 is clearer and a better reflection of national AONB policy. To make the plan sound we therefore suggest the wording in SS1 is revised to accord with ENV1.
Modifications requested	To make the plan sound we therefore suggest the wording in SS1 is revised to accord with ENV1.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To facilitate the Local Plan process
Attachment(s)	
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS330
Response Date	07/03/2022 08:41:00
Name	Patrick Allen
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	
Modifications requested	Reinstate Langham as a Small Growth Village with in the text of the document to comply with it's identity on the maps
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	In order to get across to the Inspector the absurdity of the current situation
Attachment(s)	Comments on Proposed North Norfolk Local Plan.pdf
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS327
Response Date	04/03/2022 17:36:00
Name	
Organisation	Church Commissioners for England
Agent Name	Mr Ollie

	Eyre
Agent Organisation	Deloitte
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	<p>SEE ATTACHED FILE</p> <p>The village of Horning is located on the Norfolk Broads, a settlement that has developed along the northern side of the River Bure. The village is popular visitor destination, and has a post office, newsagents/grocery store and primary school.</p> <p>The Church Commissioners for England have significant landholdings in and around Horning. They have promoted their land through previous consultations.</p> <p>The Council's 2019 Call for Sites exercise focused on small sites, between 0.24 and 1 hectare in size, located in Small Growth Villages. During that consultation, the Commissioners' put forward 8 of their smaller sites for consideration. Additionally, the representations also proposed that 'Land East of Abbot Road', allocated in the adopted Local Plan, should be rolled forward into the new Plan period.</p> <p><u>Proposed Allocations in Horning</u></p> <p>In the Regulation 19 draft Local Plan, Horning has been designated for a small amount of development (29 dwellings over the Plan period). Policy SS1 defines Horning for a small amount of infill development within the defined settlement boundary. No specific allocations were made.</p> <p>The lack of specific allocations mean that that the Commissioners' land 'Land East of Abbot Road' has not been re-allocated. The Site was initially allocated in the February 2011 Local Plan for the residential development of approximately 26 dwellings.</p> <p>'Land East of Abbot Road' (Application reference: PO/11/1505) is currently subject to a live planning application. Whilst discussions on the application continue with the council and key stakeholders in relation to water quality at the Horning Knackers Wood Water Recycling Centre, the site continues to represent a sustainable location for housing development and the allocation should therefore be retained in the new Local Plan.</p> <p>Please see attached for further information.</p>
Modifications requested	<p>SEE ATTACHED FILE</p> <p>Allocating the site at Abbot Road would provide more certainty that the housing target for Horning will be met than a strategy that relies solely on potential future infill applications.</p> <p>This will ensure that the policy is justified and effective in delivering the Council's strategic objectives over the Plan period.</p> <p>Please see attached for further information.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	The Church Commissioners for England have been engaged throughout the plan making process and still have outstanding concerns regarding the soundness of the plan.
Attachment(s)	North Norfolk Reg 19 Draft Repls LEP and EQAR Reviewed.pdf (1)
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1

Section of the Plan	Policy SS1 Spatial Strategy
ID	LPS315
Response Date	03/03/2022 11:57:58
Name	Matthew Thomas
Organisation	CODE Development Planners
Agent Name	Matthew Thomas
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified; It is not consistent with national policy
Explanation	SEE ATTACHED FILE
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	220303 FIN_Reg19_Rprt.pdf
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS1 Spatial Strategy
ID	LPS297
Response Date	03/03/2022 09:02:00
Name	
Organisation	White Lodge (Norwich) Limited
Agent Name	Mr Sam Hazell
Agent Organisation	Lawson Planning Partnership Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	SEE ATTACHED FILE SS1_Representation 2– Detailed Policy Wording

The Plan is unsound when considered against the related tests set out in paragraph 35 of the NPPF (2021) as explained below.

- **Not Positively prepared**– the proposed Small Growth Village Strategy approach will not provide enough homes of the right type in the right places for a growing population to meet the area’s needs (including affordable) and could frustrate the delivery of sustainable housing development.
- **Not Justified**– the strategy is not appropriate, taking into account the reasonable alternative to allocate suitable and available sites in Small Growth Villages, and is not based on proportionate evidence.
- **Not Effective**– the plan does not provide landowners/ developers with sufficient planning certainty and will not therefore, deliver the required development, including affordable housing, in Small Growth Villages over the plan period.
- **Not Consistent with National Policy**– The proposed Small Growth Village Strategy approach will not deliver sufficient homes, nor support community vitality & services viability, it will not therefore enable the delivery of sustainable development in rural areas. This approach would run counter to para 78 which states, “In rural areas, planning policies and decisions should be responsive to local circumstances and support housing development that reflect local needs”, and para 79, “To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”

We object to the detailed wording of Policy SS1 which does not reflect the Plan narrative or objectives, as set out below, and in detail in the representations letter dated 1st March 2022, attached.

Criterion 3a

We **OBJECT** to the overly restrictive wording of criterion 3a which requires sites to ‘immediately abut’ the boundary. As currently drafted a strict policy reading restricts development on sites which are in fact adjacent to settlement boundary, such as the Former Four Seasons Nursery site which forms part of the established village functionally and visually, and is available and suitable for development to meet local housing needs. This is the only deliverable site in High Kelling which is outside the AONB and could deliver a meaningful contribution towards affordable housing in the village as well as providing market housing. The arbitrary alignment of the settlement boundary currently follows a road and excludes key parts of the village including the nursery site, adjoining residential properties and the hospital site and therefore, requires amendment on grounds of soundness.

Criterion 3b

We **OBJECT** to the wording of criterion 3b which requires ‘The number of dwellings combined with those already approved since the date of adoption does not increase the numbers of dwellings in the defined settlement by usually more than 6% as outlined in Table 2 ‘Small Growth Villages Housing Apportionment’(1) (1) 6% allowance excludes dwellings built under, Policy SS3 ‘Community-Led Development’, policy HOU3 ‘Affordable Homes in the Countryside (Rural Exceptions Housing)’.

Criterion 3f

We **OBJECT** to the requirement for sites in excess of 0.25 hectares outside of the Settlement Boundary to be first offered to local RSLs on agreed terms and to have been declined. This approach may in fact deter landowners/ promoters/ developers from bringing sites forward in this plan period, preferring to retain the land to put forward during future reviews of the Plan when their sites might potentially be brought into the boundary and identified for market housing. It is not clear what the ‘agreed terms’ would constitute and whether these would be acceptable to landowners/ promoters/ developers. The proposed approach may therefore, in fact hinder the delivery of affordable housing contrary to the objectives of the Plan.

Please also see separate representations which request changes to the approach to meet housing need in Small Growth Villages, Policies Map, Policy HOU1, Policy HOU2, Policy HC4, Policy E6, and Policy DS1, which provide further justification in support of our representations on the Plan which should be read as a whole.

Modifications requested

SEE ATTACHED FILE

	<p>In order to enable housing development that reflects local circumstances and needs, and to make the Plan sound, the wording of the Policy SS1 criteria should be amended as follows below, and as set out in detail in the representations letter dated 1st March 2022, attached.</p> <p>3a. The site immediately abuts adjacent to the defined Settlement Boundary. If, however, the requested change to the wording of 3a is not accepted, we further request that the settlement boundary for High Kelling is amended to include part of Cromer Road, as shown on the LPP Alternative Development Boundary Plan attached, to enable the Four Seasons Nursery site to come forward for housing development to meet High Kelling's local housing need. Previous discussions with the Council indicated a need for 8 new affordable homes in the village, and the Former Four Seasons Nursery site is the only deliverable site outside the AONB. The site would make a meaningful contribution to affordable housing in the village, as well as providing market homes to meet local needs.</p> <p>3b. The number of dwellings combined with those already approved since the date of adoption does not increase the numbers of dwellings in the defined settlement by usually more than 6% as outlined in Table 2 'Small Growth Villages Housing Apportionment' proposed meets a proven local need for housing.</p> <p>Delete criterion 3f in its entirety, In the case of sites in excess of 0.25 hectares, the site, together with any adjacent developable land has first offered to local Registered Social Landlords on agreed terms which would allow its development for affordable homes, and as such an offer has been declined.</p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	In accordance with our legal right to appear before and be heard by the inspector at the hearing. We wish to elaborate on our representations, which set out the changes we have requested to the strategy approach and the identified interrelated policies that are required to make the plan sound.
Attachment(s)	176_HighKelling_Reg19.Reps.Letter.FINAL_1.3.22.pdf (1) FINAL LPPRepslett WhiteLodge NNLP 18.06.19.pdf (1)
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS1 Spatial Strategy
ID	LPS303
Response Date	03/03/2022 09:01:00
Name	
Organisation	White Lodge (Norwich) Ltd
Agent Name	Mr Sam Hazell
Agent Organisation	Lawson Planning Partnership Ltd
<p>Do you consider the plan to be Legally Compliant? * Yes * No</p>	Yes
<p>Has the duty to cooperate been met? * Yes * No</p>	Yes
<p>Do you consider the plan to be Sound? * Yes * No</p>	No
<p>Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy</p>	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	SEE ATTACHED FILE

SS1_Representation 1– Approach to meeting housing need in Small Growth Villages

The Plan is unsound when considered against the related tests set out in paragraph 35 of the NPPF (2021) as explained below.

- **Not Positively prepared**– the proposed Small Growth Village Strategy approach will not provide enough homes of the right type in the right places for a growing population to meet the area’s needs (including affordable) and could frustrate the delivery of sustainable housing development.
- **Not Justified**– the strategy is not appropriate, taking into account the reasonable alternative to allocate suitable and available sites in Small Growth Villages, and is not based on proportionate evidence.
- **Not Effective**– the plan does not provide landowners/ developers with sufficient planning certainty and will not therefore, deliver the required development, including affordable housing, in Small Growth Villages over the plan period.
- **Not Consistent with National Policy**– The proposed Small Growth Village Strategy approach will not deliver sufficient homes, nor support community vitality & services viability, it will not therefore enable the delivery of sustainable development in rural areas. This approach would run counter to para 78 which states, “In rural areas, planning policies and decisions should be responsive to local circumstances and support housing development that reflect local needs”, and para 79, “To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”

We **OBJECT** to Policy SS1 in regard to the proposed approach to not allocate sites for housing development in Small Growth Villages, and instead to rely on defined settlement boundaries and a criteria based policy approach, as set out in detail in the representations letter dated 1st March 2022, attached.

Please also see separate representations which request changes to the detailed wording of Policy SS1, Policies Map, Policy HOU1, Policy HOU2, Policy HC4, Policy E6, and Policy DS1, which provide further justification in support of our representations on the Plan which should be read as a whole.

Modifications requested

SEE ATTACHED FILE

In order to enable housing development that reflects local circumstances and needs and to make the Plan sound, it should be modified to identify site allocations for housing developments of appropriate scale at Small Growth Villages, to contribute to meeting local need (including affordable) and support local rural vitality and services viability, in accordance with the NPPF and as set out in detail in the representations letter dated 1st March 2022, attached.

High Kelling has a good range of services and is well related to the towns of Holt to the west, and Sheringham & Cromer to the northeast, via sustainable travel modes, and the principal road network.

We request that the site at the Former Four Seasons Nursery, High Kelling, is allocated for residential development as set out in our letter of 18th June 2019 submitted in response to the Reg 18 consultation, **attached**. The site is located in a sustainable location, where it will support both existing services in the settlement of High Kelling and that of those nearby. This underused site forms part of the established village functionally and visually and has the potential to provide much needed housing, including making a meaningful contribution to the affordable housing need in the village. Our 2019 submission with attached feasibility layout demonstrates that this site can be laid out in a manner which respects the prevailing character of the area and the amenities of nearby adjacent properties. It is considered that this amendment would address the soundness objection.

- Appear at examination hearing session(s)?**
 * **No, I do not wish to participate in examination hearing session(s)**
 * **Yes, I wish to participate in hearing session(s)**

Yes, I wish to participate in hearing session(s)

Justification for appearing at hearing

In accordance with our legal right to appear before and be heard by the inspector at the hearing. We wish to elaborate on our representations, which set out the changes we have requested to the

	strategy approach and the identified interrelated policies that are required to make the plan sound.
Attachment(s)	176_HighKelling_Reg19.Reps.Letter.FINAL_1.3.22.pdf (2) FINAL LPPRepslett WhiteLodge NNLP 18.06.19.pdf (2)
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS312
Response Date	03/03/2022 11:29:30
Name	
Organisation	Westmere Homes
Agent Name	Alex Munro
Agent Organisation	Armstrong Rigg Planning
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared It is not effective It is not consistent with national policy
Explanation	<p>Assessment of Policy SS1</p> <p>First and foremost, we support the council's identification of Little Snoring as one of 22 'Small Growth Villages' in the district. These are characterised as having a limited number of services whilst still comprising an important component of the settlement hierarchy where a small proportion of growth is justified. Specifically, paragraph 4.1.7 of the draft Plan states that <i>"in these smaller and more rural villages it would not be appropriate to allocate larger scale market housing given their more dispersed nature, smaller size, rural character and much more limited service provision and infrastructure availability. Nevertheless, they provide an element of day to day services and growth at an appropriate scale that reflects the character of the villages, has the potential to aid their vitality and the viability of existing services"</i>. One of the key issues that we review in greater detail below is the way in which the draft Plan seeks to define the appropriate scale of development – an approach that is crudely considered on a quantitative rather than qualitative basis.</p> <p>Sub-section 3 of Policy SS1 then goes on to state that <i>"outside of the defined settlement boundaries of Small Growth Villages residential development will be permitted only where all of (a range of) criteria are satisfied"</i>. This criteria-led approach to housing delivery at the villages is in lieu of future allocations, a step which is no longer proposed by the council. We support the flexible and positive approach the policy seeks to take in enabling the delivery of housing sites at villages such as Little Snoring.</p> <p>However, it is then vital that the criteria are both fully responsive to local circumstances and clear in their intent to the extent that they will encourage and enable the right scale and composition of development at each village. It is similarly important that the criteria as worded are not so onerous or indeed unclear that they will in fact dissuade landowners and developers from risking the submission of a planning application for an entirely sustainable scheme which may be refused on either a technicality or due to interpretation of subjective terms such as what constitutes <i>"substantial community benefit"</i>.</p> <p>Criteria (a) firstly requires that any site immediately abuts the defined settlement boundary. This is justified and is in accordance with national policy in that it seeks to avoid development that is isolated from the main settlement.</p>

Criteria (b) is more problematic. It seeks to govern the scale of new development which is acceptable at each settlement on a largely arbitrary basis, as proportionate to the scale of the existing village. Specifically, it states that *“the number of dwellings combined with those already approved since the date of adoption does not increase the numbers of dwellings in the defined settlement by usually more than 6% as outlined in Table 2 ‘Small Growth Villages Apportionment’”*. This essentially means that, as a baseline, the larger villages will experience a greater level of growth than the smaller villages. This is irrespective of the fact that they exist on the same tier of the hierarchy. Perhaps more critically it is also irrespective of both the level of services that are at each village and the development needs of each village.

Based on the methodology described above Little Snoring – a village with a pub, a shop, a pre-school, and a primary school and one which was subject of two previous allocations belying its sustainability credentials – would have an allowance of only 16 dwellings, irrespective of tenure. Sculthorpe, on the other hand, which is a village with fewer facilities and subject of no previous allocations, partially on this basis, would have a greater allowance of 20 dwellings. This draws into question whether the way in which growth allowances have been apportioned is in direct correspondence with the sustainability of the village.

Another question that must be raised in respect of this approach is then how likely it is that the level of growth identified for each village is deliverable. In total 452 dwellings are expected across the Small Growth Village tier – this represents approximately 10% of net growth over the plan period after current commitments are considered. This figure, of course, should be increased proportionately in line with out comments on the plan’s overall housing requirement. However, apportioning growth based on a combination of the size of a village and the level of recent delivery fails to recognise that some settlements are potentially critically constrained and unlikely to yield any additional sites that are guaranteed suitable and deliverable for new homes. It is acknowledged that the table identified three villages – Potter Heigham, Sea Palling and Walcott – that are environmentally constrained. However, this list should also include settlement such as Sculthorpe, which is almost entirely conservation area, and Southrepps which is washed over by the Area of Outstanding Natural Beauty. Between these villages they are expected to deliver 41 dwellings, a proportion of the dwellings factored into the council’s anticipated supply that may not even be achievable.

Remembering that one of the roles of the Small Growth Villages is to contribute towards meeting the council’s objectively assessed housing needs, one of the main drivers that should influence the way in which **Policy SS1** seeks to identify appropriate sites is the government’s increased focus on deliverability described by the NPPF. It is therefore paramount that the policy encourages development to come forward on sites that are principally available, suitable and achievable before all other objectives. This means that the wording must build in enough flexibility to allow the Council to respond to all appropriate development opportunities that may then come forward through the development management process.

In any event our client’s proposals submitted in support of their previous responses to the emerging Local Plan, comprising a scheme of at least 25 dwellings, expansion land for the school, physical linkages between the two separate ends of the village and a varied mix of new homes, demonstrates the way in which a scheme which exceeds the current 6% cap would be eminently more sustainable in the context of Little Snoring than a smaller development capped at 16 dwellings. If the level of development permissible at the site were to increase further – our client’s land can accommodate more than 100 dwellings – the scheme would potentially secure additional car parking for the pre-school and even a public village green. Even based on the smaller 25 dwelling scheme our client’s land would deliver at least 2 more affordable dwellings compared to a scheme of 16 units in a village which, as of April 2019, had 49 households on its housing waiting list. Indeed, this figure alone justifies a far greater development allowance for Little Snoring.

All this means is that if an appropriate site (or indeed sites) is identified at one of the Small Growth Villages that exceeds the indicative housing figure it should not be discounted purely based on size alone. To do so may result in appropriate larger sites being overlooked in favour of smaller sites that are less sustainable or have constraints to delivery. This outcome would firstly be counter to the NPPF’s desire to secure

sustainable development and to boost housing supply and secondly to its requirement to make the very best use of land.

Additionally, paragraph 78 of the NPPF states that in rural areas planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Paragraph 79 then goes on to state that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. It goes on to confirm that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. There appears very little recognition of the NPPF's qualitative approach to rural growth in the application of what is effectively a housing cap for each village.

This element of the policy therefore has to ensure that it is capable of achieving two separate goals: firstly, that the network of 22 Small Growth Villages can capably deliver the minimum number of dwellings required to ensure the district's overall objectively assessed needs are met; and secondly that growth at each village is permissible in perpetuity once whatever figure is apportioned to the village has been delivered if local housing or infrastructure needs dictate. It is vital that this element of the policy does not seek to introduce any notion of a cap on development if it can be demonstrated as either necessary to meet the needs of the community or indeed sustainable in all other respects.

Criteria (c) appears to present an appropriate set of guidelines in respect of character and environmental impact. However, the inclusion of terms such as 'small scale' and 'incremental growth' in guiding development are at best vague and at worst, in the context of our analysis above, once again unduly restrictive. We suggest that if these references are removed the criteria would remain entirely effective in guiding growth that is appropriate to its location.

Criteria (d) requires safe access to the site. This is, of course, justified.

Criteria (e) as worded is unduly onerous. Whilst its intent is understood and generally supported – that new development must also yield additional community benefits – the inclusion of the word 'substantial' is questioned. The requirement for development to secure substantial community benefits sets what is to our mind an unjustifiably high bar especially considering some villages are expected to deliver fewer than 20 dwellings. The use of the word substantial suggests benefits that are disproportionate to the level of new homes, giving rise to questions around both viability and CIL compliance. Instead, the criteria would function perfectly well if the word 'substantial' is removed as it then cites a list of sensible indicative improvements that would be considered as positive enhancements to the candidate village such as infrastructure and service improvements, improved connectivity etc. To provide greater clarity on what is required from development to meet this criterion this list could reasonably be expanded.

Criteria (f) is the final criteria of the policy and one which once again we consider to be entirely unjustified and actually counter-productive to its principal objective of securing affordable housing and sustainable communities. It requires sites of greater than 0.25ha to firstly be offered to a Registered Social Landlord (RSL) before any market-led development is proposed. Fundamentally this overlaps with **Policies HOU2 and HOU3** of the draft Plan which combined already provide an opportunity to secure new affordable housing on exception sites. In any event the intent of **Policy SS1** is surely to secure development that meets the needs of the various villages rather than one which seeks to simply secure affordable housing.

Ironically this criteria places both the delivery of market and affordable dwellings at risk through the introduction of added complication and delay resultant of unnecessary engagement with, and essentially marketing of the site to, RSLs. It will incentivise the delivery of smaller sites which fall below 0.25ha and with it the draft Plan's affordable housing threshold, thus resulting in a deficit of affordable housing delivery across the rural area. Similarly, it will likely encourage the subdivision of larger sites that may otherwise yield schemes that would both be expected to deliver at least 35% affordable housing, a range of dwelling types and sizes and the community benefits expected by criteria (e) of this policy.

The inclusion of this criteria would therefore likely result in villages missing out on more beneficial developments of scale and would inevitably yield piecemeal development comprising market housing only. It therefore places the overall objectives of the policy at risk and indeed may disincentivise landowners and developers from bringing forward sites as swiftly as may be necessary if they consider there is

	<p>a risk that they will be presented with a scenario of either having to accept a much-reduced price for the land as an exception site or alternatively the site being 'locked out' from a more mixed development due to RSL interest. From our client's perspective they can only see risk associated with this requirement and would be hesitant in pursuing the form and scale of development at Little Snoring described by this letter.</p> <p>In any event Policy HOU2 sets out a minimum level of affordable housing required on all development sites which will ensure that even market-led schemes will help meet the social housing needs of the community. Provision of a greater level of affordable housing above this threshold could then be included as one of the community benefits listed as part of criteria (e).</p>
<p>Modifications requested</p>	<p>Suggested Amendments to Policy SS1</p> <p>Based on our review set out above we suggest the following amended wording of sub-section 3 of Policy SS1 to ensure that it is effective in ensuring the following:</p> <ul style="list-style-type: none"> • The delivery of a minimum number of dwellings across the Small Growth Villages tier, a figure which will be dictated by any amendments to the overall housing requirement of the plan and would then represent a vital and sizeable component of the district's objectively assessed housing need; • Development at each village which is responsive to the needs of the community at any given time between now and the end of the plan period in 2036; and • The identification of a range of sites that will deliver a sufficient mix of both market and affordable housing whilst viably securing appropriate social infrastructure to the benefit of the community. <p>Proposed insertions are highlighted in red text with proposed deletions in red but struck through:</p> <p>1 <i>Outside of the defined boundaries of Small Growth Villages residential development will be permitted only where all of the following criteria are satisfied:</i></p> <ol style="list-style-type: none"> 1 <i>The site immediately abuts the defined Settlement Boundary: and</i> 2 <i>The number of dwellings combined with those already approved since the date of adoption does not increase the numbers of dwellings in the defined settlement by usually across all of the Small Growth Villages by more than 6% XXXX* dwellings, as outlined in Table 2 'Small Growth Villages Housing Apportionment'. Once this figure is exceeded residential-led will only be acceptable where it demonstrably meets a localised housing need, demonstrated by way of an up-to-date housing need survey, and accords with all other criteria of this policy;</i> 3 <i>The proposal is small scale, incremental growth compatible with the form and character of the village and its landscape setting in terms of siting, scale, design, impact on heritage assets and historical character; and</i> 4 <i>Safe and convenient access can be provided; and</i> 5 <i>The proposal incorporates substantial community benefits which may included (as examples); including necessary infrastructure and service improvements, and improved connectivity to the village and wider GI network, or an uplift in affordable housing above the requirement set out in Policy HOU2 where it meets a demonstrable need.; and</i> 6 <i>In the case of sites in excess of 0.25 hectares, the site, together with any adjacent developable land, has first been offered to a Registered Social Landlord on agreed terms which would allow its development for affordable homes, and such an offer has been declined.</i> <p><i>*Figure to be determined as a proportion of the overall residual growth required by the plan</i></p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>

Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS338
Response Date	04/03/2022 14:32:12
Name	Miss Natalie Beal
Organisation	Broads Authority
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Comment Impact on the Broads (and AONB?) needs to be specifically mentioned here. Relevant part of NPPF The Broads and the setting of the Broads is protected at NPPF paragraph 176.
Modifications requested	Proposed change 'The proposal is small scale, incremental growth compatible with the form and character of the village and its landscape setting in terms of siting, scale, design, impact on heritage assets and historic character and the Broads ; and'
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS369
Response Date	07/03/2022 10:33:05
Name	
Organisation	Glavenhill Strategic Land
Agent Name	Ms Erica Whettingsteel
Agent Organisation	EJW Planning
Do you consider the plan to be Legally Compliant? * Yes * No	Yes

Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not consistent with national policy
Explanation	<p>Whilst the broad principles of the spatial strategy and the sustainable approach to directing growth to the larger settlements and better serviced villages appears sound, it is important that the remaining rural villages within the district (those not currently listed in the hierarchy) are not precluded from appropriate small-scale development as rural housing is essential for ensuring the viable use of existing local facilities (especially local schools). With regard to settlements not listed in the hierarchy the approach set out in Bullet point 4 of SS1, is inconsistent with national policy. The NPPF does not promote a restrictive approach to development outside of settlements, it does not protect the countryside for its own sake, or prescribe the type of development that is acceptable. The NPPG reiterates the objective set out in the Framework and clearly states that all settlements can play a role in delivering sustainable development in rural areas and that blanket policies restricting housing in some settlements and preventing other settlements from expanding should be avoided. The Framework's overall message in terms of supporting rural communities is clear 'a thriving rural community depends, in part, on retaining local services and community facilities. Therefore modest housing growth in villages, particularly those with existing services and facilities is consistent with the framework.</p>
Modifications requested	<i>Suggested modification</i>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS1 Spatial Strategy
ID	LPS383
Response Date	07/03/2022 11:33:43
Name	
Organisation	D L Ritchie Will Trust
Agent Name	David Jones
Agent Organisation	Armstrong Rigg Planning
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	SEE ATTACHED FILE

	<p>Policy SS1 – Spatial Strategy</p> <p>Ludham is located in the south-east of North Norfolk District and is a large village with a good range of community facilities, including a village store, post office, doctor’s surgery and primary school. The Local Plan recognises the size and sustainability of the village and identifies it as a Large Growth Village at emerging Policy SS1.</p> <p>The policy identifies Large Growth Villages, along with the Growth Towns (Large and Small), as the most sustainable locations for growth due to their level of service provision. It states that the majority of new development will be located in the larger town and villages in the District having regard to their role as employment, retail and service centre, the identified need for new development and their individual capacity to accommodate sustainable growth. By contrast, a small amount of development is proposed to be focussed in the Small Growth Villages.</p> <p>Our client supports this approach to allocating more development to the most sustainable locations and the identification of Ludham as a Large Growth Village.</p> <p>Recommendation: Our client’s only recommended change to Policy SS1 is to make it clear that the Countryside Policy Area includes all land outside of defined settlement boundaries. The policy currently implies that this area does not include land adjoining the growth towns and villages. We recommend the following amendment to ensure that the plan is effective and therefore sound.</p>
Modifications requested	<p>SEE ATTACHED FILE</p> <p>Policy SS 1</p> <p><i>“Spatial Strategy</i></p> <p><i>5. The rest of North Norfolk, including all settlements not listed above and all land located outside of designated Settlement Boundaries, is designated as Countryside Policy Area where development will be limited to those types allowed for in Policy SS 2 ‘Development in the Countryside’.”</i></p>
<p>Appear at examination hearing session(s)?</p> <p>* No, I do not wish to participate in examination hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To participate in the debate
Attachment(s)	Enclosure 3 - Policy SS1 - Spatial Strategy.pdf
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS386
Response Date	07/03/2022 11:49:02
Name	
Organisation	Holkham Estate
Agent Name	Mr Garth Hanlon
Agent Organisation	Savills (UK) Limited
<p>Do you consider the plan to be Legally Compliant?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Has the duty to cooperate been met?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Do you consider the plan to be Sound?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Reason(s) not Sound</p> <p>* It is not positively prepared</p> <p>* It is not effective</p> <p>* It is not justified</p> <p>* It is not consistent with national policy</p>	

<p>Explanation</p>	<p>Policy SS1 (Spatial Strategy)</p> <p>Savills (UK) Limited is instructed by the Holkham Estate to make the necessary and relevant representations to the Regulation 19 Local Plan document currently out for consultation. As a major landowner within the District, it is important to engage with the Development Plan process and as such, the representations are submitted to ensure that the Plan is positively prepared, justified, effective and consistent with National Policy within the NPPF.</p> <p>Policy SS1 (Spatial Strategy) sets out the Strategy to distribute new development within the District within the Plan period. This Strategy is based on directing new development towards the largest towns and villages in the District having regard to the roles that they have concerning the level of services and facilities, the level of need/demand for new development and the ability of the settlement to absorb growth in a sustainable manner.</p> <p>Alongside a Spatial Strategy which directs new development to the most sustainable settlements in the District are a number of policies controlling the location of growth having regard to particular designations. Within policy SS1 is wording in the first paragraph which states that major development will not be permitted within the North Norfolk Coast Area of Outstanding Natural Beauty unless sustainable alternatives are available. Such a Statement is consistent with the contents of the Plan which identifies sites for development within the Area of Outstanding Natural Beauty – it is not the case that there is a blank policy constraint which prevents any development within such a designation.</p> <p>The Holkham Estate landholdings in and around Wells-next-the-Sea are subject to the plans and policies within the plan period. Policy SS1 (Spatial Strategy) states that Wells-next-the-Sea falls to be considered as a Small Growth Town alongside the Settlements of Holt, Hoveton, Sheringham and Stalham.</p> <p>The Estate generally supports the framework for a strategy directing growth that is based upon the ability of the settlement to absorb growth having regard to existing levels of services and facilities as well as the environmental, economic, social considerations that fall to be considered when directing new development to new sites. In such a context we support Wells-next-the-Sea identification as a “Small Growth Town” which recognises that there is a comprehensive range of services within the settlement.</p> <p>Paragraph 4.14 of the Plan states that each of the five named settlements contain a Public Secondary School (with the exception of Holt), at least one large convenience store, a reasonable selection of comparison shops, health services and a range of local employment opportunities. In this context there is a recognition that their service role is more limited to the Large Growth Towns but nevertheless provides a location for a significant amount of services and facilities to ensure that they provide an appropriate focus for new growth within the Plan period.</p> <p>The identification of Wells-next-the-Sea within the Small Growth Town acknowledges the important role it plays in the second tier of the settlement hierarchy (after Large Growth Towns). In such a context it should be concluded that each of the Five Settlements within the Small Growth Town category would not only share the same characteristics as expressed above (under paragraph 4.1.4 of the Plan) but it also considered logical that the growth within each settlement will be similar within each tier. This is not the case within this Plan having regard to the amount of new dwellings being apportioned to the five settlements in the same category since it is the case that Wells is by far the settlement that is accommodating the least amount of new housing growth set out in Policy HOU1 which the subject of separate representation by the Estate.</p> <p>Having regard to the above, whilst the Estate supports Policy SS1 and the identification of Wells-next-the-Sea as a Small Growth Town, it remains concerned about the distribution of growth within the five settlements in that tier of the hierarchy. This is the subject of separate representations to this plan and in particular Policy HOU 1 of the Plan where the Estate is objecting to the overall scale of growth and suggesting further development in Wells-next -the-Sea.</p>
<p>Modifications requested</p>	<p>Holkham Estate supports the identification of Wells next the Sea being identified as a Small Growth Town in Policy SS1 of the Plan.</p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s)</p>	<p>No, I do not wish to participate in examination hearing session(s)</p>

* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS1 Spatial Strategy
ID	LPS378
Response Date	07/03/2022 11:22:00
Name	
Organisation	The Pigs Edgefield
Agent Name	Mr Iain Hill
Agent Organisation	Bidwells
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	<p>Land off Plumstead Road, Edgefield</p> <p>Policy SS1 3 of the Proposed Submission Version (Regulation 19 Publication) Local Plan (the draft Local Plan) identifies 23 Small Growth Villages as locations that are, in principle, considered suitable to accommodate a small amount of development. (The scale of development will not be expected to increase the number of dwellings in the relevant settlement by more than 6%.) The draft Local Plan states that the Total Housing Delivery within the Small Growth Villages will be 452 units.</p> <p>The draft Local Plan does not recognise Edgefield as a Small Growth Village, however, no detailed explanation is provided in the evidence base as to why other settlements have been selected in favour of Edgefield. On this basis, reliance has to be given to documents prepared in relation to previous stages of the preparation of the Local Plan. Therefore, comments made in at the Regulation 18 stage are repeated below.</p> <p>1 Edgefield</p> <p>The Council's Background Paper 2: Distribution of Growth, released as part of the First Draft Local Plan consultation, outlines the methodology used to justify the selection of the Small Growth Villages. Page 11 of the Paper acknowledges that settlements have been assessed at a high level, and further consideration will be given through the Local Plan process to other villages in North Norfolk, which may be more suitable for small scale growth. Whilst our client is supportive of the emerging Plan's intention to, in accordance with the NPPF, identify certain villages for growth, it is evident that, in our view, the methodology is flawed and should be reconsidered to ensure that growth requirements to 2036 can be delivered.</p> <p>The starting point of the Council's assessment was to consider only those settlements which had a school or a shop. This approach is considered too restrictive as it rules out a number of other settlements which otherwise could be suitable for small scale development. More specifically, it fails to recognise that certain locations, such as Edgefield, are within close proximity of higher order settlements i.e. Large Growth Towns or Small Growth Towns, and are, therefore, capable of benefiting from the range of services / amenities within these locations.</p>

	<p>For example, Edgefield is excluded as a Small Growth Village on the basis that it does not have a school or a shop. However, the village is approximately 3 miles from Holt and the range of services and amenities it provides, including schools. In addition, Edgefield provides a bus service to Holt, allowing the town to be accessed by a sustainable form of transport.</p> <p>In relation to Secondary and Desirable Services, Edgefield is well provided, being on a Main Road (B1149, Norwich Road), which as detailed above, provides connectivity and public transport access, as well as a public house / restaurant, meeting place, vehicle repair shop and a place of worship. It could also be argued that The Pigs provides employment opportunities. The Pigs is a thriving leisure facility, which as well as a pub/ restaurant, provides luxury accommodation and a Spa. In total, the Pigs provides employment for 35 people. This is more than many traditional employment uses falling within the B Use Class.</p> <p>In addition, the methodology adopted provides the potential for settlements which already have a range of local services to expand, whilst restricting the ability of those which under the terms of the Council's methodology don't, to experience growth. This is considered to be an unreasonable and unsustainable approach which is contrary to the NPPF. More specifically, if certain locations experience growth, it is likely that the increased demand and expenditure generated will make it more viable to for new services to open; a process that will, crucially, help maintain the vitality of rural communities. The methodology adopted will result in growth being restricted in the rural locations that are potentially in most need of it. The Council's methodology is, therefore, considered to be contrary to paragraph 79 of the NPPF which states that:</p> <p><i>“To promote sustainable development in rural areas, housing should be located where it will <u>enhance</u> or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.”</i></p> <p>In addition, as detailed above, The Proposed Submission Version Local Plan seeks to allocated 450 dwellings across the Small Growth Villages, equating to 17 dwellings per settlement. The Small Growth Villages have been selected based on service provision prior to site-specific planning constraints being considered. Coupled with the fact that housing density in these locations is likely to be low, reflecting the rural character of these settlements, it is questionable if the selected settlements can accommodate the forecast growth which adds further pressure on the spatial distribution of growth amongst the Small Growth Villages.</p> <p>Based on the foregoing, in order to ensure that the Council's approach in relation to Small Growth Villages is justified, effective and consistent with national policy, we suggest a that a broader range of settlements is identified, including settlements which are within close proximity of higher order settlements and have, through sustainable growth, the potential to enhance the vitality of that settlement.</p> <p>For reasons detailed above, Edgefield is considered to be a settlement that can satisfy these requirements and, therefore, should be identified as a Small Growth Settlement.</p>
<p>Modifications requested</p>	<p>As outlined above, Edgefield should be identified as Small Growth Village that has the capacity to absorb further growth, ensuring the vitality of the village is preserved. No evidence has been provided to our knowledge that demonstrates why other settlements have been selected above Edgefield.</p> <p>On this basis, it is our view that the draft Local Plan is not justified and therefore is not sound.</p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>Justification for appearing at hearing</p>	<p>I reserve the right to appear prior to publication of the draft agendas that will set out the Inspector's matters and questions to form the basis of the discussions at the Hearings. The intention to appear is to seek to ensure that the Policy can be made sound, if required.</p>
<p>Attachment(s)</p>	
<p>Consultation Point Title</p>	<p>Spatial Strategy</p>
<p>Consultation Point Number</p>	<p>Policy SS 1</p>

Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS500
Response Date	07/03/2022 20:22:29
Name	Mr Ed Abigail
Organisation	Environment Agency
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively preparedIt is not effectiveIt is not consistent with national policy
Explanation	<p>The general Spatial Strategy SS 1 Policy is welcomed and we do overall support its inclusion. However, as currently written we do not consider that it provides sufficient detail on environmental protection requirements for any small growth villages. In Particular, Horning, and with specific reference to the constraints regarding Water Quality, and Foul Drainage for foul water and wastewater disposal/treatment within the growth area.</p> <p>We note that there is a housing allowance of 29 dwellings marked for Horning, listed as a small growth village within the Plan. This allowance, along with any potential further windfall developments that may come forward during the Plan period is potentially undeliverable, and without a specific policy to guide development may pose unacceptable risks that would be against National Planning Policy Framework policies 20 and 174. The Plan as it is currently written also fails to evidence how it can be consistent with achieving sustainable growth for a small growth area like Horning.</p> <p>Consideration is needed as to whether a policy addition could be incorporated into the SS 1 policy or whether a specific policy for Horning would be more appropriate, and also offer greater clarity for decision makers and developers reading the Plan.</p> <p>Current constraints in Horning, make any growth proposals unsustainable.</p>
Modifications requested	<p>We consider, that the Plan could be found sound, providing the addition of the below policy, or similar wording, be included separately or incorporated into the current Spatial Strategy SS 1 policy with regard to small growth villages, specifically Horning.</p> <p>Policy request: Water Quality – Foul Drainage, Horning</p> <p>Any development proposals within the Horning area and surrounding catchment for the Knackers Wood Water Recycling Centre for foul drainage and wastewater treatment, will be subject to the current Horning Knackers Wood Joint Position Statement¹ or any subsequent future revisions. To ensure the protection of designated sites and to prevent the deterioration of Water Framework Directive status, no new development that increases foul water flows requiring connection to the public foul drainage system within the Horning Knackers Wood Catchment will be permitted, until it is confirmed that capacity is available within the foul sewerage network and at the Water Recycling Centre to serve the proposed development.</p> <p>Informative:</p> <p>North Norfolk LPA should be aware that there are ongoing early-stage discussions taking place between the relevant parties, to update the current position statement. This is an emerging situation, and any alterations will be communicated at the earliest opportunity. The current constraints make it unsustainable for any growth to be brought forward, and so any applications will need to continue to have due regard to</p>

	<p>the existing position statement. Whilst work is currently ongoing to generate headroom capacity at the Knackers Wood WRC, this will need to be reviewed upon completion of the works. Any future position statement, that takes account of any revised data, may still not allow for growth or may only be in favour of limited allocations.</p> <p>Footnote:</p> <p>1 Include link to Knackers Wood Joint Position Statement 20170124-Joint-Position-Statement-inc-LAs-Horning-v4-2017-signed.pdf (broads-authority.gov.uk)</p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS421
Response Date	07/03/2022 18:04:00
Name	
Organisation	Richborough Estates
Agent Name	Mrs Raj Bains
Agent Organisation	Boyer Planning
<p>Do you consider the plan to be Legally Compliant? * Yes * No</p>	
<p>Has the duty to cooperate been met? * Yes * No</p>	
<p>Do you consider the plan to be Sound? * Yes * No</p>	No
<p>Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy</p>	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	<p>Please refer to full statement of representations (see LPS263) on behalf of our client.</p> <p>The Spatial Strategy (Chapter 4 of the emerging Plan) sets out the distribution of development through a settlement hierarchy of Large Growth Towns, Small Growth Towns, Large Growth Villages and Small Growth Villages. This approach to development is supported as it provides clarity where significant growth is expected across the District over the Local Plan period.</p> <p>The strategy proposes that new growth and development would be located in 'Large Growth Towns' (50%) and in Large Growth Villages. In the settlement hierarchy Large Growth Towns are proposed to be; Fakenham, Cromer and North Walsham. The SA identifies these as areas which function as strong service centres for the District.</p> <p>We strongly support a settlement hierarchy approach to the Local Plan and that North Walsham is defined as a Large Growth Town within North Norfolk. As set out above, we consider North Walsham a highly sustainable location within the District to facilitate a significant amount of housing and economic growth during the plan period.</p> <p>Given that North Norfolk is predominantly rural and coastal by nature, a large proportion of the District is constrained by national designations (Norfolk Coast Area of Outstanding Natural Beauty, and the Norfolk Broads Executive Area), ecological and landscape designations, which would limit development and growth options. North Walsham however, is free from these constraints and therefore provides opportunities for housing and economic growth over the plan period. Therefore,</p>

	<p>development in North Walsham is strongly supported, as a sufficient amount of development in this area would achieve the objectives of the emerging Local Plan.</p> <p>As highlighted in previously, there is clearly a need for significant development in North Walsham for multiple reasons, primarily meeting the needs of the local community and strengthening the role and function of North Walsham as a town centre.</p> <p>The emerging Local Plan proposes a housing requirement of 9,600 dwellings to be delivered over the plan period, where 50% of new housing, commercial and other development is expected to be delivered in Cromer, Fakenham and North Walsham. A large proportion of housing has been completed through permissions already (2,393 dwellings as set out in Policy HOU 1) with a significant amount yet to be delivered through proposed site allocations (5,408 new homes) including proposed Policy NW62/A Land West of North Walsham (SUE).</p> <p>We consider the proposed level of housing delivery to be unrealistic and not sustainable. We also consider that NNDC have overestimated the housing delivery as shown in the trajectory of the emerging Local Plan.</p> <p>Whilst we support development and growth being allocated to North Walsham, we strongly disagree that the majority of the proposed site allocations are likely to come forward in the first 5 years of the emerging plan, most importantly the proposed SUE (Policy NW62/A Land west of Walsham). There is no robust or sufficient evidence to suggest these are deliverable within the short term period of the plan. We therefore disagree that the plan is sound as the proposed housing trajectory is unjustified.</p> <p>Paragraph 35 of the revised National Planning Policy Framework (NPPF) 2021, sets out four tests that must be satisfied in order for Local Plans to be considered sound. These are:</p> <p>‘a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</p> <p>b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p>c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</p> <p>d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.’</p> <p>The proposed SUE (Policy NW62/A Land West of North Walsham) presents significant concerns related to the principle of the delivery of the site and the site specific requirements of the policy, which therefore threatens the spatial strategy of the Local Plan and delivery of housing. These concerns are considered in detail in Section 7 of the attached representations.</p>
<p>Modifications requested</p>	<p>We strongly suggest alternative sites in North Walsham are considered as allocations within the proposed plan that could deliver housing in the short term including Land at Paston Gateway. It is considered that Land at Paston Gateway is the most logical of the alternative site options to deliver housing in North Walsham. This would help contribute towards ensuring that the plan achieves the minimum housing requirement, and provides the necessary growth earlier in the plan period, which could be achieved without prejudice to the overall spatial strategy of the emerging plan.</p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>Justification for appearing at hearing</p>	<p>Our representations provide fundamental concerns about the proposed policies contained in the Local Plan. It is critical the Inspector hears our views on why we think the Plan is unsound and will fail to meet local housing needs of North Norfolk. Ultimately, our views could help assist the Council in ensuring there is an adequate supply of new housing across the District and throughout the short term, medium and long term period of the Local Plan.</p>
<p>Attachment(s)</p>	

Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS639
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	<p>1. The majority of new development will be located in the larger towns and villages in the District having regard to their role as employment, retail and service centres, the identified need for new development and their individual capacity to accommodate sustainable growth.</p> <p>Where sustainable alternatives are available, major development will not be permitted in the North Norfolk Coast Area of Outstanding Natural Beauty. Development will be located where it minimises the risk from flooding and coastal erosion and mitigates and adapts to the impacts of climate change.</p> <p>This clause does not meet the "Justified" test of soundness. Weybourne is within the AONB.</p>
Modifications requested	Villages within the AONB should be given the same protections as rural areas outside the AONB.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS460
Response Date	07/03/2022 16:39:32
Name	
Organisation	Broadland Housing Association
Agent Name	Mr Jake Lambert
Agent Organisation	Bidwells
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met?	Yes

* Yes	
* No	
Do you consider the plan to be Sound?	Yes
* Yes	
* No	
Reason(s) not Sound	
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	<p>BHA supports the proposed settlement hierarchy and strategy for the distribution of growth in North Norfolk to 2036. In particular, BHA strongly supports part 3f of the policy, which requires sites outside of the defined boundaries of Small Growth Villages to first be offered to local Registered Social Landlords for the development of affordable housing.</p> <p>However, notwithstanding their support, to ensure the policy is effective, BHA wish to secure greater clarity on how Part 3f of the policy will be applied in practice. For instance, BHA wish to understand whether land would be offered to Registered Social Landlords at a market rate, or at a rate that is considered viable for a RSL to develop the site.</p> <p>BHA also supports footnote 1 of the policy, which excludes dwellings approved under Policy HOU3 (rural exception sites) from the 6% growth allowance for Small Growth Villages. BHA is supportive of this policy element as it allows flexibility for identified affordable housing needs to be met through the delivery of rural exception sites</p>
Modifications requested	Greater clarity on how Part 3f of the policy will be applied in practice. For instance, BHA wish to understand whether land would be offered to Registered Social Landlords at a market rate, or at a rate that is considered viable for a RSL to develop the site.
Appear at examination hearing session(s)?	Yes, I wish to participate in hearing session(s)
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	To support part 3f of the policy, and to seek assurances regarding its intended applicability in practice.
Attachment(s)	
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS437
Response Date	07/03/2022 14:57:00
Name	Mr Will Wright
Organisation	ESCO Developments, Flagship Housing Group & Lovell Partnerships
Agent Name	Sarah Hornbrook
Agent Organisation	Bidwells LLP
Do you consider the plan to be Legally Compliant?	Yes
* Yes	
* No	
Has the duty to cooperate been met?	Yes
* Yes	
* No	
Do you consider the plan to be Sound?	Yes
* Yes	
* No	
Reason(s) not Sound	
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	

Explanation	<p>The proposed Spatial Strategy, and in particular the identification of Cromer, Fakenham, North Walsham as Large Growth Towns where a high proportion (approximately 50%) of new housing, commercial and other developments will be located, is strongly supported.</p> <p>Cromer, Fakenham and North Walsham are the main centres of population within the District, are the focus for economic growth in the area and provide a range of amenities, services and infrastructure to support sustainable housing.</p> <p>The Large Growth Towns provide opportunities for strategic growth i.e. over 1,000 units. Developments of this scale are capable of providing a wide range of infrastructure improvements, such as schools, employment, health centres and green infrastructure, which will provide benefits to both existing and future residents.</p> <p>This approach is entirely consistent with paragraph 73 of the NPPF, which advises that "The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided that they are well located and designed and supported by the necessary infrastructure and facilities."</p>
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	<p>Whilst we are fully supportive of the proposed policy we are aware that objections may be made to the Policy at this Reg.19 stage.</p> <p>Accordingly we reserve the right to appear prior to publication of the draft agendas that will set out the Inspector's matters and questions to form the basis of the discussions at the Hearings. The intention to appear is to seek to ensure that the Policy continues to remain sound.</p>
Attachment(s)	
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS534
Response Date	07/03/2022 17:00:00
Name	Mr David Williams
Organisation	PSK Building Surveyors Ltd
Agent Name	Mr Alastair Curran
Agent Organisation	Planning Places Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	It is considered that insufficient housing has been allocated in Sheringham. Sheringham is designated as a 'Small Growth Town', the second largest settlement type defined in the Spatial Strategy. Sheringham is within walking distance of Cromer a Large Growth Town and benefits from all of its services and amenities. Sheringham is a sustainable location, conducive to development due to the abundance

	<p>of local facilities, good road networks, regular train and bus services, and provision of essential services.</p> <p>The NPPF defines sustainable development in Paragraph 8, whereby the economic objective states that there should be sufficient land available for development in the right places. In a plan-led system, development should be planned, however only 133 dwellings are proposed, which is not considered sufficient for a population of over 7,000 and growing, especially in light of the recent 'rush to the coast' of people seeking a better-quality living during and post the pandemic.</p> <p>Insufficient housing has been allocated in Sheringham especially considering the planned growth of Holt, an arguably less sustainable settlement (in terms of facilities and transport links) in comparison to Sheringham. Equally, in paragraph 15.0.03 of the local plan, the Council acknowledge that "<i>There is very little previously developed (brownfield) land in Sheringham</i>" and "<i>New greenfield allocations are therefore necessary in order to deliver the required growth.</i>" With this in mind, the proposed strategy would actively constrict Sheringham and potentially result in an economic strangulation, especially if the tourism sector declines. Ultimately, the plan does not facilitate enough growth for the next 14+ years.</p> <p>A more justified strategy would be to allocate more sites for development in Sheringham for Policy SS1 to be consistent with national policy in facilitating growth and helping supply sufficient housing to meet the identified needs of the local population.</p> <p>Additionally, the plan relies heavily upon windfall sites, requiring 15.6% of all development to be unplanned, almost equal to the planned Small Growth Towns at 16.2%. This is not in accordance with positive plan-making and does not promote sustainable development, ultimately resulting in an ineffective strategy for delivering housing. More allocations in sustainable locations, for example Site Weybourne Road (Weybourne Road Sheringham, Site Location Plan), would produce a more effective local plan which is positively prepared and would facilitate appropriate development throughout the plan period.</p>
Modifications requested	A more justified strategy would be to allocate more sites for development in Sheringham for Policy SS1 to be consistent with national policy in facilitating growth and helping supply sufficient housing to meet the identified needs of the local population.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To further explore the issues of insufficient allocated land within Sheringham, and the struggles with identifying brownfield land within such a sustainable location. Ultimately, without allowing development adjacent to Sheringham, the settlement will struggle to grow in accordance with its needs, and could suffer significant economic difficulties as a consequence.
Attachment(s)	
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS475
Response Date	07/03/2022 17:44:29
Name	Mr Tom Abrey & Ms Laura Caraccio-Hewitt
Organisation	
Agent Name	Mr Alastair Curran
Agent Organisation	Planning Places Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes	Yes

* No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective/it is not consistent with national policy
Explanation	<p>Policy SS1 is not consistent with national policy (namely paragraph 79 of the National Planning Policy Framework (NPPF)) as it does not enable the suitable delivery of sustainable development in rural locations in accordance with the NPPF.</p> <p>Within proposed 'Policy SS1 – Spatial Strategy', Stiffkey is classified as 'countryside' by the policy. This restricts development within the settlement unless it meets the restrictive criteria set out within policy 'SS2 – Development in the Countryside'.</p> <p>North Norfolk District Council (NNDC) have set a high windfall target plan at 1,890 homes across the entire district. NNDC have allocated land in most sustainable settlements, and in some smaller localities, however large areas of the district have been avoided, despite existing settlements with some form of service provision. It is acknowledged that more residents are necessary to sustain small local businesses than has historically been the case, (for example 10 years ago the population of Langham supported a village shop, but as of 2019, this was not sufficient to retain the store Planning reference PF/19/0667). However, this should not mean that providing new dwellings within existing smaller settlements should be discouraged, as even small residential proposals can help retain existing local services, and cumulatively, new houses can promote the creation of new facilities in neighbouring villages.</p> <p>Small housing allocations should therefore be considered within more smaller settlements such as Stiffkey, that are currently designated as countryside despite local shops, pubs, and regular bus services (multiple times a day throughout the week). Such allocations can offer economic benefits to the rural community whilst helping sustain existing services and promote new facilities. This is highlighted within paragraph 79 of the NPPF which states the need for villages to grow and thrive, especially where development will support local services. With this in mind, sites such as Hillcrest in Stiffkey should be considered for small scale housing development to help make the plan more consistent with national policy and ultimately more sound.</p> <p>Furthermore, it is more effective for NNDC to reach their housing targets through planned development across the district rather than relying so heavily on windfall development likely resulting in unacceptable ad hoc countryside proposals, determined on a first come first served basis.</p>
Modifications requested	<p>Small housing allocations should therefore be considered within more smaller settlements such as Stiffkey, that are currently designated as countryside despite local shops, pubs, and regular bus services (multiple times a day throughout the week). Such allocations can offer economic benefits to the rural community whilst helping sustain existing services and promote new facilities. This is highlighted within paragraph 79 of the NPPF which states the need for villages to grow and thrive, especially where development will support local services. With this in mind, sites such as Hillcrest in Stiffkey should be considered for small scale housing development to help make the plan more consistent with national policy and ultimately more sound.</p> <p>Furthermore, it is more effective for NNDC to reach their housing targets through planned development across the district rather than relying so heavily on windfall development likely resulting in unacceptable ad hoc countryside proposals.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	It would be beneficial to assist the Inspector in verbalising the issues with the proposed Spatial Strategy and assisting in securing a more sound spatial strategy which better enables rural communities to grow and thrive. Additionally, we can help source alternative sites that could be included to assist in delivering houses in smaller settlements across the district.

Attachment(s)	20220307 - Site Location Plan Stiffkey.pdf
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS451
Response Date	07/03/2022 16:14:50
Name	Lord Tom Raynham
Organisation	Raynham Farm Company Limited
Agent Name	Mr Nick Moys
Agent Organisation	Brown & Co
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not consistent with national policy
Explanation	<p>It is considered that Policy SS1 is unduly restrictive in that it effectively provides for a blanket ban on housing development in smaller rural villages that are not classed as Large Growth Villages or Small Growth Villages, with the exception of affordable housing and community-led projects.</p> <p>Whilst the range of facilities is more limited in small rural villages, local facilities and employment opportunities are not absent in such places, and many have thriving local communities. It is considered that such smaller villages are capable of sustaining modest scale housing schemes, which would in turn would help to maintain the vitality of these communities, support facilities that are present, such as local schools and rural transport services. Furthermore, development in smaller villages can in turn support services in other local settlements. By supporting rural facilities, small scale development of this kind would benefit existing residents, as well as boosting the supply of housing.</p> <p>It is considered that the current draft policy is not sound as it is not consistent with national planning policy. National Planning Guidance notes that 'A wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness'. The National Planning Policy Framework also notes in paragraph 79 that 'Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby'.</p>
Modifications requested	It is suggested that provision be made in the policy to allow small scale housing development within smaller villages. Criteria could be included to define the relationship of sites to existing developed areas, for instance by allowing infilling and rounding off, and to require development to respect local form and character. Such policies have been adopted by a number of local authorities, including the neighbouring authority of Breckland, where Local Plan Policy HOU05 makes provision for small scale housing development in small villages without settlement boundaries.
Appear at examination hearing session(s)?	No, I do not wish to participate in examination hearing session(s)

* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS484
Response Date	07/03/2022 18:19:25
Name	
Organisation	Sutherland Homes
Agent Name	Mr Mark Singer
Agent Organisation	Barton Willmore
Do you consider the plan to be Legally Compliant?	Yes
* Yes	
* No	
Has the duty to cooperate been met?	Yes
* Yes	
* No	
Do you consider the plan to be Sound?	No
* Yes	
* No	
Reason(s) not Sound	It is not justified
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	SEE ATTACHED FILE
Modifications requested	SEE ATTACHED FILE
Appear at examination hearing session(s)?	Yes, I wish to participate in hearing session(s)
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	Please refer to our representations sent via email
Attachment(s)	220307 Representations to NNDC Draft Local Plan Proposed Submission Version (C16).pdf
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS508
Response Date	07/03/2022 22:50:00
Name	Mr John Grieves
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	Yes
* Yes	
* No	
Has the duty to cooperate been met?	Yes
* Yes	
* No	
Do you consider the plan to be Sound?	No

* Yes	
* No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	The village of Aldborough no longer has sufficient facilities to comply with NNDC's definition as a Service Village. In recent years closures of retail outlets & reduction of transport services has left just one post office which has taken over the function of a small village shop BUT has already survived one listing for closure by Royal Mail & who knows when they may next attempt to do so. There is a modern antiques shop which has irregular opening, often once a week or by appointment. Employment is limited to the farms, one pub, one garage & the Post office. The butcher, the Spar shop, one Antique shop & one pub having closed & the buildings converted to residential use. The bus service has reduced to the extent that transport to other towns/places of employment does not exist for arrival at a place of employment &/or return home for normal working hours.
Modifications requested	Aldborough should no longer be identified as or considered as a Service Village.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS797
Response Date	28/02/2022 14:38:00
Name	Mr Darl Sweetland
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	CLARIFICATION: We note that in 4.1.1 the Settlement Hierarchy has taken account of the 'infrastructure in each place' and 'the extent to which future developments may be constrained...'. We further note that this has been assessed in the Sustainability Appraisal (SA). With reference to earlier comments on the spatial aspects of development in delivering climate change objective apart from one reference in the SA Page 146) it is not evidence how much weight has been attached to the objective of using embedded carbon/existing (water/ wastewater) infrastructure in determining the spatial location, quantum and phasing of growth.
Modifications requested	

Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS798
Response Date	28/02/2022 14:38:00
Name	Mr Darl Sweetland
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	SUPPORT: Anglian Water supports the general policy thrust to direct the majority of development to larger settlements set out in Policy SS1. CLARIFICATION: With reference to 4.1.9, it is not evident whether the Small Growth Village apportionment takes account of water supply, wastewater, or water quality capacity/ environmental constraints. For example, the apportionment in Table 2, page 63 and specially Footnote 3, it is not clear whether the village apportionment figure takes into account the headroom capacity or the need for further investment/ carbon intense capacity increases in the wastewater pipeline or treatment capacity network.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS749
Response Date	04/03/2022 15:07:00
Name	
Organisation	Glavenhill Strategic Land
Agent Name	Mr Philip Atkinson
Agent Organisation	Lanpro Services

Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>My client Glavenhill is promoting lower-grade agricultural land at Badersfield for balanced mixed-use development. Badersfield is identified in Policy SS2 of the emerging Local Plan as a Small Growth Village that in combination with other villages in the District will receive some 7.6% of planned housing growth over the emerging Plan-period. This OBJECTION should be read in conjunction with previous representations submitted by Glavenhill relating to land at Badersfield.</p> <p>Glavenhill consider that Badersfield is a good location for housing and employment growth and supports the strategic aim as outlined in paragraph 8.0.1 of the emerging Local Plan that states "Delivering sustainable growth requires that housing growth is matched with improved employment opportunities close to where people live."</p> <p>Glavenhill control land to the north and east of the village of Badersfield adjacent and to the north of Scottow Enterprise Park (SEP). Glavenhill has previously promoted this land for a mix of private and affordable housing, elderly and specialist care, new community services and employment uses at various stages in the emerging Local Plan's evolution. My client is concerned that no new housing or employment growth is proposed to be allocated at Badersfield to support the continued growth and success of the SEP.</p> <p>Glavenhill through their previous Local Plan submissions, detailed in their Vision and Delivery Document submitted in June 2019, confirms that the village of Badersfield is a sustainable location for planned housing and employment growth. As explained previously the village benefits from a range of core services including convenience retail and post office, place of worship and a public house as well as major employment at the SEP and HMP Bure. Further services such as high schools, medical and dental practices, sports grounds, libraries and emergency services are also within a short distance.</p>
Modifications requested	<p>Glavenhill is seeking amendments to emerging policies SS1, SS2 and HOU1 in the emerging Local Plan to recognise the potential of Badersfield to deliver new and innovative economic growth enabled by additional new housing provision in this sustainable growth location. My client is also seeking the removal of references to Badersfield being an unsustainable location for new growth within NNDC area in the emerging Local Plan. This is because being the acknowledged third largest employment centre in the District and well served by existing housing and day-to-day facilities this simply cannot be the case that it is unsustainable.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	<p>My clients would like to attend the Examination in Public in due course to discuss their proposal and better explain the emerging Local Plan changes now sought to facilitate the planned development.</p>
Attachment(s)	
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS760
Response Date	03/03/2022 14:29:00
Name	Mr

	Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Services & Facilities 1.The provision of 452 additional houses in the small growth villages will put increased pressure on infrastructure and facilities, but as they are small-scale developments, this won't trigger an assessment of the additional services that will be required. 2. If most new homes in the villages and coastal areas are likely to be occupied by retired people, they will put increased pressure on healthcare provision, above and beyond that for an average age distribution 3. Ambulance response times are already woefully inadequate in rural areas. Increased housing will increase demand, especially as it is forecast that many of the new homes will be occupied by retirees who are more likely to need emergency hospital treatment than the population as a whole, while the higher population will increase traffic, thereby increasing the ambulance response times even further.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS675
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes

Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Natural England supports the strategic framework set out in Policy SS1 and highlight the recommendation of cross referencing all types of developmental growth with Policy ENV1 to ensure protected landscapes are fully considered in all proposals.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy
ID	LPS805
Response Date	07/03/2022 18:09:00
Name	
Organisation	Turley Planning
Agent Name	Mr Steve Kosky
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	SEE ATTACHED FILES 3.1 The 2008 Core Strategy defines Cromer as one of three 'Principal Settlements' where in the majority of new residential development (50% of new homes) should be provided. Building upon the 2008 Core Strategy, Cromer, Fakenham and North Walsham continue to be identified as 'Large Growth Towns' under Policy SS1 – Spatial Strategy in the Regulation 19 Draft Local Plan. These Large Growth Towns remain at the top of the settlement hierarchy and are defined as being; <i>'the main centres of population and have the broadest range of day-to-day services, including 'higher order' services'</i> . 3.2 Policy HOU1 identifies that in order to provide the minimum new homes needed over the Plan period, specific development sites are required to account for at least 4,900new homes, which includes the Large Growth Towns. 3.3 The Regulation 19 Draft Plan also identifies that <i>'Cromer could support relatively high levels of growth'</i> . However, the Plan states that its functional sustainability needs to be <i>'balanced against the importance of the national landscape designation which surrounds the town (the AONB)'</i> . For this reason the Plan states that it does not propose the same scale of growth as the other two Large Growth Towns of Fakenham and North Walsham. 3.4 This is reflected by the fact that of the 6,203 new homes which are proposed to be delivered in the Large Growth Towns from all

supply sources, including new allocations, (51% of the total number of new homes required) Cromer is apportioned only 1,024 of these new homes, which is 17% of the total apportioned to the Large Growth Towns. Furthermore, in terms of new homes to be provided from allocated sites, the share for Cromer is only 572 dwellings or 9.2% of the total share for the Large Growth Towns.

3.5 This disproportionate allocation to Cromer of 17%, compared to North Walsham (48%) and Fakenham (35%) would have some logical rationale, if the residential site allocations at Cromer were generally focused on suitable sites which were not located in the AONB. This is because the availability of such sites is limited and exceptional circumstances are required to release any site from the AONB for development. Furthermore, in order to do so, the Council must also take into account the existence of reasonable alternatives.

3.6 However in this case, the Council have pursued the complete inverse of this equation, by prioritising development in the AONB to the exclusion of other, more sustainable, non AONB, alternatives, such as Pigeon's Clifton Park Site, which was previously proposed to be allocated on the basis of its high level of sustainability. In addition, there appears to be an absence of any exceptional circumstances in the evidence base to justify these AONB allocations.

3.7 Within the First Draft Local Plan, in 2019, the Sustainability Appraisal identified the Pigeon Site as *'one of the most sustainable and suitable of the Cromer alternatives'*.

3.8 Accordingly, within the First Draft of the Local Plan, the Pigeon Site was allocated as a mixed-use scheme for approximately 90 homes, land for a two-form entry primary school and open space, under Site Reference: C10/1. Indeed it was the only allocation, except for Land at Cromer High Station (C07/2) which was not located within the AONB.

3.9 The Site had been proposed as a reserve site to meet future education requirements, but following further discussion with the Education Authority, it was concluded that the land for the school was not required. Accordingly in the interim period between the First Draft Local Plan Consultation and the current Regulation 19 Consultation, the proposals have been modified and revised to reflect the current vision for the Scheme as detailed in the accompanying Delivery Statement (**Appendix 2**).

3.10 The revised Scheme is for 55 new homes and Extra Care accommodation, on only 40% of the Site, with the balance in favour of substantive areas of new publicly accessible green space to the west, resulting in biodiversity net gain. The new Scheme has been conceived on the basis of feedback received during the First Draft Consultation. However, notwithstanding these amendments and the continued suitability of the Site in principle, as recognised by the Sustainability Appraisal, the view was taken by the Council prior to the Regulation 19 Consultation, and against the recommendation of Officers, to remove this Site as an allocation in the Draft Local Plan going forward.

3.11 The rationale for this was based on the inaccurate perception of potential coalescence with neighbouring settlements to the west (East Runton). However the new Scheme has increased the extent of publicly accessible green space, including along the Site's frontage with the A149, with no potential for physical or perceived coalescence as demonstrated by the Concept Masterplan contained within the accompanying Delivery Statement (**Appendix 2**).

3.12 In addition, the land continues to have an absence of significant environmental and planning constraints and is highly suitable for development in this particular part of Cromer. Furthermore the land is immediately available and can be brought forward for delivery in the short term.

3.13 In summary, Pigeon fully supports the designation of Cromer as a Large Growth Town, recognising its function as an administrative centre and popular tourist destination which is located on the principal road and rail networks. However, Pigeon considers that the late omission of their previously draft allocated Site as an allocation in this Regulation 19 consultation, reflects a serious flaw in the site selection methodology of the Draft Plan, which needs to be rectified, as the Plan is not sound in its current form.

3.14 This is primarily because no tangible evidence has been adduced to demonstrate that the limited harm caused by the Pigeon Site, by reason of any perceived coalescence, outweighs the material harm which will be caused to the integrity of the national AONB designation

	<p>resulting from the allocation of the AONB sites at Overstrand Road and Pine Tree Farm.</p> <p>3.15 In addition, these other sites also have site specific issues, which strongly suggests that deliverability is not assured, which is discussed further in the next sections.</p>
Modifications requested	<p>SEE ATTACHED FILES</p> <p>3.50 On balance, the spatial strategy, including the primary site allocations in the Draft Local Plan is not considered to be sound, being neither positively prepared, justified, effective nor consistent with National Policy.</p> <p>3.51 This is reflected by the disproportionate allocation of new homes across the Large Growth Towns away from Cromer in favour of Fakenham and North Walsham and the significant number of delivery issues which have been identified with the above strategic allocations made in these two settlement locations.</p> <p>3.52 These spatial issues are compounded by the site specific delivery issues which are also identified at the strategic allocations made in Cromer itself, which are addressed in more detail in Sections 5 and 6 of these representations.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	<p>Pigeon Investment Management - Responses to the North Norfolk Regulation 19 Consultation - January 2022 FINAL.pdf Appendix 2 - Land at Clifton Park - Delivery Statement.pdf</p>
Consultation Point Title	Spatial Strategy
Consultation Point Number	Policy SS 1
Section of the Plan	Policy SS 1 Spatial Strategy & Map Figures
ID	LPS516
Response Date	24/01/2022 12:00:00
Name	Mr Roy Allen
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>Langham Village is not included in the lists of Small Growth Villages (pp63 & 64). This is correct as we have no shop or post office and do not fulfil the criteria requirements. However on the map (p66) and on all other similar maps in the Development Plan, Langham is shown as a Small Growth Village with a small grey dot.</p>
Modifications requested	<p>These maps are, therefore, incorrect. I trust you are able to address this matter and would appreciate an acknowledgement of this letter, and confirmation that Langham is classed as a Countryside Village.</p>
Appear at examination hearing session(s)?	

* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

4.2 Development in the Countryside

Consultation Point Title	Development in the Countryside
Consultation Point Number	4.2
Section of the Plan	4.2 Development in the Countryside
ID	LPS85
Response Date	15/02/2022 14:00:00
Name	Dr Nicholas Palmer
Organisation	Compassion in World Farming
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p><i>The submission is from Compassion in World Farming, a non-governmental organisation seeking to reduce and ultimately end intensive farming practices, on both animal welfare and environmental grounds.</i></p> <p>The draft Local Plan includes a welcome stress on sustainability, but there is no reference to whether proposed farming developments are in keeping with the direction of national planning and Government codes of practice.</p> <p>This is short-sighted, since it leaves farming businesses and the surrounding community exposed to the impact of foreseeable change. A new development may be justifiable in itself today, yet no longer viable when existing policy directions are followed by legislation, resulting in substantial agricultural development being wasted.</p> <p>In particular, there is a risk in allowing the continuing development of large intensive farms, dependent on continuing growth in demand for meat. The Government National Food Strategy (NFS) proposes a reduction in meat consumption of 30% of the next decade.[1] If the Government delivers on this, the financial basis for expansion of meat farming will be undermined.</p> <p>The Council should be able to consider whether to approve farming planning applications that envisage practices that breach Government codes of practice but may not yet be actually unlawful. While councillors cannot be expected to be familiar with every aspect of secondary legislation, objections that draw attention to such issues should be given serious consideration, since it is against the interest of the community and indeed the farm to approve a planning application for a development that breaches government guidelines – both for the Council's reputation and because the farm is unlikely to be sustainable on that basis.</p> <p>To give two examples which may be raised in connection with specific applications:</p> <ul style="list-style-type: none"> • Some new developments for pig farms are designed with a waste system which cannot deal with the amount of manipulable material e.g. straw that farmers are required to use by law. The outcome may be either failure to treat the animals lawfully or disposal of waste by means not stated in the application. • Intensive poultry farms typically use fast-growing breeds whose size exceeds the capacity of the farm as the birds grows. The recommended approach to avoid this is to use breeds consistent with the size of the farm, but many farms still use "thinning" (removal of birds not yet fully grown for early slaughter) as a way

	<p>around the problem. This is explicitly against the recommended Government code of practice, and if the code in due course becomes law, farms designed with that model will struggle to be viable.</p> <p>The planning authority cannot reasonably be expected to speculate on future developments not yet signposted by government, but it is in the interest of the community as a whole to avoid development of businesses likely to become unviable because of stated Government policy.</p> <p>[1]https://www.nationalfoodstrategy.org/the-report/ - page 11</p>
Modifications requested	<p>We propose, therefore, the addition of one paragraph to the section on "Development in the Countryside":</p> <p>In assessing agricultural planning applications, the Council may take into account the consistency of the proposed development with current or reasonably expected Government policy and codes of practice.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Development in the Countryside
Consultation Point Number	4.2
Section of the Plan	SS2 & Rural Estates Policy
ID	LPS323
Response Date	03/03/2022 18:59:00
Name	
Organisation	Kelling Estate LLP
Agent Name	Roger Welchman
Agent Organisation	Armstrong Rigg Planning
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	<p>SEE ATTACHED FILE</p> <p>Explanation of recommended amendments to policy SS2 Part C. This is proposed to ensure the policy is positively prepared making as much use as possible of previously developed land consistent with national policy.</p> <p>Part K. We consider this additional criteria which is consistent with that contained in the Regulation 18 version of the draft Local Plan would, in the absence of the certainty provided by allocations at small growth villages, provide an important additional source of housing. It would provide for both a greater degree of flexibility in the sources of supply, given the dispersed rural nature of North Norfolk and contribute to the support that national policy conveys to rural housing.</p>
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)

Justification for appearing at hearing	
Attachment(s)	4. Policy SS2 - Representation to Regulation 19 Version of North Norfolk Local Plan.pdf 5. Policy Rural Estates - Representation to Regulation 19 Version of North Norfolk Local Plan.pdf

Policy SS 2 Development in the Countryside

Consultation Point Title	Development in the Countryside
Consultation Point Number	Policy SS 2
Section of the Plan	Policy SS 2 Development in the Countryside
ID	LPS48
Response Date	16/02/2022 14:02:21
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	point c - the new ability to subdivide houses in the countryside to more than one dwelling. This is unsustainable as it will create a greater number of more isolated dwellings and associated car journeys to access services. point f , recreation and tourism, it is important to maintain the wildness and tranquillity of our countryside in order to make it attractive to residents and visitors. Too much tourism development will suburbanise and domesticate the landscape.
Modifications requested	point c - the new ability to subdivide houses in the countryside to more than one dwelling should be removed from this policy. point f development for recreation and tourism should be carefully considered bearing the Lndscape Character Assesement in mind.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Development in the Countryside
Consultation Point Number	Policy SS 2
Section of the Plan	Policy SS 2 Development in the Countryside
ID	LPS64
Response Date	08/02/2022 19:24:48
Name	Dr Bianca Finger-Berry
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	No

Has the duty to cooperate been met? * Yes * No	No
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	Designating NW52 as employment land is not in line with this policy on development in the countryside, it does not fulfil any of the criteria set out here and should therefore not happen. It is currently agricultural land and used at certain times of years as a campsite.
Modifications requested	Not designate NW52 as employment land.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Development in the Countryside
Consultation Point Number	Policy SS 2
Section of the Plan	Policy SS 2 Development in the Countryside
ID	LPS128
Response Date	21/02/2022 15:15:28
Name	Mrs Gemma Harrison
Organisation	Holt Town Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective It is not consistent with national policy
Explanation	Holt Town Cllrs are concerned with the proposed new policy to sub-divide existing dwellings in the countryside to create multiple dwellings. Whilst they appreciate that using existing housing stock has its benefits, it is encouraging more car journeys to take place, and this brings with it a larger carbon footprint which is something everyone is currently trying to reduce. Smaller houses in the countryside may lead to an increase in rural isolation and the associated health implications this brings. Smaller dwellings will attract individuals and small families who will not have their family support network nearby or easy access to facilities and services. The provision of emergency services should also be considered as currently the East Anglian Ambulance Service struggle to meet their target call out times in the rural areas of North Norfolk. By encouraging further dwellings in the countryside will only impact on this further.
Modifications requested	Remove H altogether.

Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Development in the Countryside
Consultation Point Number	Policy SS 2
Section of the Plan	Policy SS 2 Development in the Countryside
ID	LPS257
Response Date	28/02/2022 07:47:00
Name	Mr Michael Rayner
Organisation	CPRE Norfolk
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	We are concerned about the ambiguity of including category f, 'recreation and tourism' under this policy. That could be interpreted as meaning that new housing for holiday accommodation would be permitted under this policy. It is unclear what is meant by this form of development, especially as no further explanation is provided in the supporting text.
Modifications requested	Clarify point f so that it is clear this does not refer to housing/accommodation for recreation and tourism.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Development in the Countryside
Consultation Point Number	Policy SS 2
Section of the Plan	Policy SS 2 Development in the Countryside
ID	LPS206
Response Date	23/02/2022 23:13:14
Name	Mrs Gemma Harrison
Organisation	Cley Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes	Yes

* No	
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Cley Parish Council OBJECT to the new policy which has been introduced to sub-divide existing housing stock in the countryside. This could lead very quickly to a sudden increase of houses in the countryside with the associated additional car journeys. North Norfolk does not lend itself for sustainable travel in the countryside, public transport routes are poor, ambulance response times are below target and North Norfolk has a predominantly elderly population. The District Council has declared a climate change emergency and therefore this proposed policy is unsound and will lead to an increased carbon footprint, further compound rural isolation and create added pressure on the existing emergency services.
Modifications requested	Remove this new policy to split up dwellings in the countryside.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Development in the Countryside
Consultation Point Number	Policy SS 2
Section of the Plan	Policy SS 2 Development in the Countryside
ID	LPS339
Response Date	04/03/2022 14:33:34
Name	Miss Natalie Beal
Organisation	Broads Authority
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Comment I am surprised that these uses are to be permitted outside of/far from development boundaries which is likely to rely on use of private car to get to and from them. It is not clear why this is the case. This is of relevance to the Broads as some of the area of NNDC next to the Broads is classed as countryside. I would have expected, if a more permissive approach were required or desired, that text along the lines of i would be appropriate for d and e.

	Relevant part of NPPF The Broads and the setting of the Broads is protected at NPPF paragraph 176.
Modifications requested	Proposed change d. temporary and permanent accommodation for gypsies and travellers where there is a demonstrable need for the development and where alternative sites within defined Settlement Boundaries are shown not to be available or suitable. e. community facilities and services including, but not limited to, community halls, health, education, places of worship and community led developments where there is a demonstrable need for the development and where alternative sites within defined Settlement Boundaries are shown not to be available or suitable.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Development in the Countryside
Consultation Point Number	Policy SS 2
Section of the Plan	Policy SS 2 Development in the Countryside
ID	LPS364
Response Date	05/03/2022 14:40:41
Name	Mr Edward Witton
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	<i>There is a conflict with NPPF 79 "To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this, will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby."</i> There are far too many villages which have inappropriately been classified as "Countryside". One (Scottow) has a population of 1,785. There are others with modest populations e.g. Binham, which has less than 300 inhabitants, which currently has services which are unlikely to be sustainable in the longer term.
Modifications requested	There is a need to re-visit the villages which have been classified as "Countryside" with a view to making them more inclusive so that they can "thrive and grow" instead of "writing them off".
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)

Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Development in the Countryside
Consultation Point Number	Policy SS 2
Section of the Plan	Policy SS 2 Development in the Countryside
ID	LPS394
Response Date	07/03/2022 11:59:25
Name	
Organisation	Holkham Estate
Agent Name	Mr Garth Hanlon
Agent Organisation	Savills (UK) Limited
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	<p>Policy SS2 (Development in the Countryside)</p> <p>Savills (UK) Limited is instructed by the Holkham Estate to make the necessary and relevant representations to the Regulation 19 Local Plan document currently out for consultation. As a major landowner within the District, it is important to engage with the Development Plan process and as such, the representations are submitted to ensure that the Plan is positively prepared, justified, effective and consistent with National Policy within the NPPF.</p> <p>To meet these tests of soundness we maintain that Policy SS2 (Development in the Countryside) should be amended as follows (additions shown bold underlined):</p> <p>Policy SS2 – Development in the Countryside</p> <p><i>In the designated Countryside Policy Area, as defined on the Policies Map, planning permission will be granted which complies with the policies of this Plan and is for one or more of the following:</i></p> <ol style="list-style-type: none"> 1 use and development of land associated with agriculture or forestry; 2 the provision of infrastructure including, but not limited to, roads, drainage, coastal and flood protection, power including renewable energy, and development by statutory undertakers, utility and telecommunications providers; 3 affordable homes, replacement dwellings, replacement of existing buildings/redevelopment of previously developed sites, sub-division of dwellings, essential rural workers accommodation; 4 temporary and permanent accommodation for gypsies and travellers; 5 community facilities and services including, but not limited to, community halls, health, education, places of worship and community led developments; 6 recreation and tourism; 7 extensions to existing dwellings and businesses; 8 re-use of existing buildings; 9 new employment generating development or specialist accommodation for the elderly infirm (and others requiring care), where there is a demonstrable need for the development and where alternative sites within defined Settlement Boundaries are shown not to be available or suitable; and,

- 0 *small-scale residential development adjacent to the defined settlement boundaries of Small Growth Villages in accordance with Policy SS 1 'Spatial Strategy'.*
- 1 **Proposals for small scale development appropriate to their setting in locations offering opportunities for sustainable growth, which would result in the infilling or rounding off in a built-up area.**
- 2 **Development proposals contained in rural estates which are in accordance with an Estate Masterplan which has been endorsed by North Norfolk District Council.**

The additions to the policy are recommended to ensure it is positively prepared and consistent with national policy. In particular:

Part c, reflects the emphasis which the NPPF places on making as much use as possible of previously developed land (NPPF, paragraph 119).

Part k will provide a greater degree of flexibility in the sources of housing supply, important given the dispersed rural nature of North Norfolk and contribute to the support national policy gives to rural housing (NPPF, paragraph 79).

Part l acknowledges the important role large rural estates like the Holkham Estate play in North Norfolk in supporting a prosperous rural economy. The importance that the Holkham Estate plays in this respect is underlined when one considers the important contribution they make in delivering against each and every one of the elements (a-d) expressed under paragraph 84 of the NPPF. This additional criteria to the policy will enable the Estate to plan for future development needs in a jointly agreed master-planned way and provide for a greater degree of certainty for the Estate, the Council, the local community and other relevant stakeholders. This will also enable the Estate to more clearly plan and realise its ambition to deliver and manage housing schemes which provide for local community needs.

Modifications requested

To meet the tests of soundness we maintain that Policy SS2 (Development in the Countryside) should be amended as follows (additions shown **bold underlined**):

Policy SS2 – Development in the Countryside

In the designated Countryside Policy Area, as defined on the Policies Map, planning permission will be granted which complies with the policies of this Plan and is for one or more of the following:

- 1 *use and development of land associated with agriculture or forestry;*
- 2 *the provision of infrastructure including, but not limited to, roads, drainage, coastal and flood protection, power including renewable energy, and development by statutory undertakers, utility and telecommunications providers;*
- 3 *affordable homes, replacement dwellings, **replacement of existing buildings/redevelopment of previously developed sites**, sub-division of dwellings, essential rural workers accommodation;*
- 4 *temporary and permanent accommodation for gypsies and travellers;*
- 5 *community facilities and services including, but not limited to, community halls, health, education, places of worship and community led developments;*
- 6 *recreation and tourism;*
- 7 *extensions to existing dwellings and businesses;*
- 8 *re-use of existing buildings;*
- 9 *new employment generating development or specialist accommodation for the elderly infirm (and others requiring care), where there is a demonstrable need for the development and where alternative sites within defined Settlement Boundaries are shown not to be available or suitable; and,*
- 0 *small-scale residential development adjacent to the defined settlement boundaries of Small Growth Villages in accordance with Policy SS 1 'Spatial Strategy'.*
- 1 **Proposals for small scale development appropriate to their setting in locations offering opportunities for sustainable growth, which would result in the infilling or rounding off in a built-up area.**
- 2 **Development proposals contained in rural estates which are in accordance with an Estate Masterplan which has been endorsed by North Norfolk District Council.**

The additions to the policy are recommended to ensure it is positively prepared and consistent with national policy. In particular:

	<p>Part c, reflects the emphasis which the NPPF places on making as much use as possible of previously developed land (NPPF, paragraph 119).</p> <p>Part k will provide a greater degree of flexibility in the sources of housing supply, important given the dispersed rural nature of North Norfolk and contribute to the support national policy gives to rural housing (NPPF, paragraph 79).</p> <p>Part l acknowledges the important role large rural estates like the Holkham Estate play in North Norfolk in supporting a prosperous rural economy. The importance that the Holkham Estate plays in this respect is underlined when one considers the important contribution they make in delivering against each and every one of the elements (a-d) expressed under paragraph 84 of the NPPF. This additional criteria to the policy will enable the Estate to plan for future development needs in a jointly agreed master-planned way and provide for a greater degree of certainty for the Estate, the Council, the local community and other relevant stakeholders. This will also enable the Estate to more clearly plan and realise its ambition to deliver and manage housing schemes which provide for local community needs.</p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To seek further clarity on the policy and to have a detailed discussion on the merits of the issue as far as the Estate is concerned
Attachment(s)	
Consultation Point Title	Development in the Countryside
Consultation Point Number	Policy SS 2
Section of the Plan	Policy SS 2 Development in the Countryside
ID	LPS477
Response Date	07/03/2022 18:09:06
Name	
Organisation	Crisp Malting Group
Agent Name	Mr Jake Lambert
Agent Organisation	Bidwells
<p>Do you consider the plan to be Legally Compliant? * Yes * No</p>	Yes
<p>Has the duty to cooperate been met? * Yes * No</p>	Yes
<p>Do you consider the plan to be Sound? * Yes * No</p>	No
<p>Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy</p>	It is not effective
Explanation	<p>SEE ATTACHED FILE</p> <p><u>This policy is unsound as it is considered ineffective</u></p> <p>Part g. of Policy SS2 recognises that extensions to existing businesses in the Countryside should be supported. While CMG support the principle of this policy element, it should be revised to align more closely with the objective of Policy E3 (Employment Development Outside of Employment Areas). Specifically, part b of Policy E3 accommodates employment development beyond employment areas where they relate to:</p> <ol style="list-style-type: none"> 1 <i>the expansion of an existing business;</i> 2 <i>businesses that are based on agriculture, forestry or other industry where there are sustainability advantages to being located in close proximity to the market they serve;</i>

	3 industries and/or businesses which would be detrimental to local amenity if located in settlements, including on designated or allocated employment areas
Modifications requested	<p>SEE ATTACHED FILE</p> <p>To ensure consistency between Policy SS2 and Policy E3, it is considered that the following amendment is required to Policy SS2:</p> <p><i>In the designated Countryside Policy Area, as defined on the Policies Map, planning permission will be granted which complies with the policies of this Plan and is for one or more of the following:</i></p> <ol style="list-style-type: none"> 1 use and development of land associated with agriculture or forestry; 2 the provision of infrastructure including, but not limited to, roads, drainage, coastal and flood protection, power including renewable energy, and development by statutory undertakers, utility and telecommunications providers; 3 affordable homes, replacement dwellings, sub division of dwellings, essential rural workers accommodation 4 temporary and permanent accommodation for gypsies and travellers; 5 community facilities and services including, but not limited to, community halls, health, education, places of worship and community led developments; 6 recreation and tourism; 7 extensions to existing dwellings and businesses; 8 Expansion of existing businesses in accordance with Policy E3 9 re-use of existing buildings; 10 new employment generating development or specialist accommodation for the elderly infirm (and others requiring care), where there is a demonstrable need for the development and where alternative sites within defined Settlement Boundaries are shown not to be available or suitable; and, small-scale residential development adjacent to the defined settlement boundaries of Small Growth Villages in accordance with Policy SS 1 'Spatial Strategy' <p>Without this amendment, it is considered that the disconnect between Policy SS2 and Policy E3 could render criterion vii of SS2 ineffective and in conflict with Paragraph 35(c) of the NPPF.</p> <p>Please see the attached PDF for a clearer representation of the suggested amendment.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To ensure that the disconnect between Policy SS2 and Policy E3 is addressed, to ensure that policies in the emerging Local Plan enable the rural economy to thrive.
Attachment(s)	North Norfolk Local Plan Regulation 19 Representation [Crisp Malt].pdf (1)
Consultation Point Title	Development in the Countryside
Consultation Point Number	Policy SS 2
Section of the Plan	Policy SS 2 Development in the Countryside
ID	LPS537
Response Date	07/03/2022 17:00:00
Name	Mr Rob Ravilious
Organisation	Ilex Homes
Agent Name	Mr Alastair Curran
Agent Organisation	Planning Places Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes	

* No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	<p>Policy SS2 of the proposed Local Plan is inconsistent with national policy, is not positively prepared, is unjustified, and ineffective.</p> <p>The overall housing delivery targets of the Plan rely on substantial windfall developments, and a policy that restricts large areas of the district from sustainable development. This will not aid in securing the necessary windfall to ensure the plan meets its objectively identified needs. Instead, this will see development unfairly congregated in certain locations, disadvantaging existing communities in urban areas and further exacerbating issues of rural communities in conflict with paragraph 79 of the NPPF.</p> <p>Policy SS2 supports developments adjacent to 'small growth villages' but does not support sustainable development adjacent to large growth villages, small growth towns, large growth towns, or existing hamlets and other service areas. The policy acknowledges an understanding of rural housing needs, through the support in principle for small-scale development for small growth villages, yet it does not apply this fairly across the proposed strategy. It also questions why this strategy is acceptable in small growth villages, but not adjacent to the urban boundary in large growth towns, such as Holt, for example.</p> <p>North Norfolk relies upon windfall development to deliver its housing need for the plan period, yet the plan relies upon a small number of small and medium sized allocations, and very limited support for windfall development in certain locations. Therefore, this limited growth is not as effective as it could be in securing appropriate sustainable housing for the district, across the district to support existing communities.</p>
Modifications requested	To make the policy more sound, through greater compliance with the NPPF, it is postulated that SS2, should support developments adjacent to other settlement boundaries, not just 'small growth towns.' Specifically, support should be provided for greater flexibility in helping small communities grown, either through site specific allocations, or through facilitating windfall proposals adjacent to existing communities.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	It would be beneficial to speak about the strategy for housing delivery in rural communities, expanding upon the ambitions of the NPPF and the reality of rural delivery within North Norfolk. Equally, we could assist in the procurement of specific sites worthy of consideration for allocation.
Attachment(s)	
Consultation Point Title	Development in the Countryside
Consultation Point Number	Policy SS 2
Section of the Plan	Policy SS 2 Development in the Countryside
ID	LPS750
Response Date	04/03/2022 15:07:00
Name	
Organisation	Glavenhill Strategic Land
Agent Name	Mr Philip Atkinson
Agent Organisation	Lanpro Services
Do you consider the plan to be Legally Compliant? * Yes * No	

<p>Has the duty to cooperate been met? * Yes * No</p>	
<p>Do you consider the plan to be Sound? * Yes * No</p>	No
<p>Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy</p>	
<p>Explanation</p>	<p>My client Glavenhill is promoting lower-grade agricultural land at Badersfield for balanced mixed-use development. Badersfield is identified in Policy SS2 of the emerging Local Plan as a Small Growth Village that in combination with other villages in the District will receive some 7.6% of planned housing growth over the emerging Plan-period. This OBJECTION should be read in conjunction with previous representations submitted by Glavenhill relating to land at Badersfield.</p> <p>Glavenhill consider that Badersfield is a good location for housing and employment growth and supports the strategic aim as outlined in paragraph 8.0.1 of the emerging Local Plan that states "Delivering sustainable growth requires that housing growth is matched with improved employment opportunities close to where people live."</p> <p>Glavenhill control land to the north and east of the village of Badersfield adjacent and to the north of Scottow Enterprise Park (SEP). Glavenhill has previously promoted this land for a mix of private and affordable housing, elderly and specialist care, new community services and employment uses at various stages in the emerging Local Plan's evolution. My client is concerned that no new housing or employment growth is proposed to be allocated at Badersfield to support the continued growth and success of the SEP.</p> <p>Glavenhill through their previous Local Plan submissions, detailed in their Vision and Delivery Document submitted in June 2019, confirms that the village of Badersfield is a sustainable location for planned housing and employment growth. As explained previously the village benefits from a range of core services including convenience retail and post office, place of worship and a public house as well as major employment at the SEP and HMP Bure. Further services such as high schools, medical and dental practices, sports grounds, libraries and emergency services are also within a short distance.</p>
<p>Modifications requested</p>	<p>Glavenhill is also seeking amendments to emerging policies SS1, SS2 and HOU1 in the emerging Local Plan to recognise the potential of Badersfield to deliver new and innovative economic growth enabled by additional new housing provision in this sustainable growth location. My client is also seeking the removal of references to Badersfield being an unsustainable location for new growth within NNDC area in the emerging Local Plan. This is because being the acknowledged third largest employment centre in the District and well served by existing housing and day-to-day facilities this simply cannot be the case that it is unsustainable.</p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	Yes, I wish to participate in hearing session(s)
<p>Justification for appearing at hearing</p>	<p>My clients would like to attend the Examination in Public in due course to discuss their proposal and better explain the emerging Local Plan changes now sought to facilitate the planned development.</p>
<p>Attachment(s)</p>	

Policy SS 3 Community-Led Development

Consultation Point Title	Community-Led Development
Consultation Point Number	Policy SS 3
Section of the Plan	Policy SS 3 Community-Led Development
ID	LPS370
Response Date	07/03/2022 10:36:19
Name	
Organisation	Glavenhill Strategic Land
Agent Name	Ms Erica Whettingsteel
Agent Organisation	EJW Planning
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared It is not consistent with national policy
Explanation	Whilst the promotion of such a policy is admirable the policy is overly prescriptive and sets too, a high bar to enable development to come forward. Furthermore, Policy SS1 sets out the distribution of development and limits development outside of the settlements listed in the hierarchy it is therefore not clear where the form of development anticipated by Policy SS3 can take place. Moreover, the housing needs of the District are set out in HOU1 in and terms of local housing need as far as it relates to affordable housing set in HOU 3 Affordable housing in the countryside (rural exceptions housing) which specifically addresses local need. Beyond this local community aspirations can be addressed by a made Neighbourhood Plan which is already set out in statute and forms a part of the Development Plan.
Modifications requested	For the reasons set out in answer to question 5, Policy SS3 is not positively prepared, is unnecessary and should be deleted.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Community-Led Development
Consultation Point Number	Policy SS 3
Section of the Plan	Policy SS 3 Community-Led Development
ID	LPS461
Response Date	07/03/2022 16:41:09
Name	
Organisation	Broadland Housing Association
Agent Name	Mr Jake Lambert
Agent Organisation	Bidwells
Do you consider the plan to be Legally Compliant? * Yes	Yes

* No	
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	BHA wishes to support this policy, which seeks to guide the delivery of community-led housing projects in North Norfolk. BHA are currently working with Community Land Trusts in North Norfolk to deliver affordable-led housing development, and the criterion listed in the policy are considered suitable to support emerging community-led development.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Community-Led Development
Consultation Point Number	Policy SS 3
Section of the Plan	Policy SS 3 Community-Led Development
ID	LPS676
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Natural England supports the principal of community-led development. Where green spaces are proposed we suggest that local biodiversity assets are supported by incorporating appropriate habitat into the design. Any new housing should be subject to the emerging Recreational Impact Avoidance & Mitigation Strategy (RAMS), as stated in the HRA. We recommend that Policy ENV4 is referenced in Policy SS3 to ensure designated sites and biodiversity opportunities are considered fully in community-led development.
Modifications requested	
Appear at examination hearing session(s)?	

* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

5 Delivering Well Connected, Healthy Communities

Consultation Point Title	Delivering Well Connected, Healthy Communities
Consultation Point Number	5
Section of the Plan	5.4
ID	LPS220
Response Date	24/02/2022 11:08:16
Name	Andy Scales
Organisation	Norfolk Constabulary
Agent Name	Andy Scales
Agent Organisation	NPS Property Consultants Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not consistent with national policy
Explanation	SEE ATTACHED FILE
Modifications requested	SEE ATTACHED FILE
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	Norfolk Constabulary reserve the right to appear at the Hearing should modifications to be plan not be made in advance of its Examination to explain fully the justification for the changes requested to ensure soundness.
Attachment(s)	NNDC Reg 19 consultation response (Feb 2022).docx (1)

5.1 Health & Wellbeing

Consultation Point Title	Health & Wellbeing
Consultation Point Number	5.1
Section of the Plan	5.1.1 & 5.1.3
ID	LPS528
Response Date	03/03/2022 11:04:00
Name	Mr Thomas Clare
Organisation	NHS Norfolk & Waveney CCG (ICS Estates)
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	We note that you have made reference to the National Planning Policy framework, the Local Planning in Health Protocol and contributions sought from developers to support health infrastructure. I would like to draw your attention to the wording around the Norfolk and Waveney Sustainable and Transformation Partnership (STP), this is now recognised as the Norfolk and Waveney Integrated Care System (ICS), which will come in to legal effect from July 2022.
Modifications requested	Any reference to the STP should now be replaced with the ICS. I would also like to inform you that the Planning in Health protocol referred to in the plan is currently under review in case you would like to reference it being updated in the plan.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Consultation Point Title	Health & Wellbeing
Consultation Point Number	Policy HC 1
Section of the Plan	Policy HC 1 Health & Wellbeing
ID	LPS49
Response Date	09/02/2022 16:21:00
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	This policy says a health impact assessment is required for developments of 500+ dwellings. Who is doing the HIA? Is it independent? What about social care needs? Health and social care are now integrated at the local level. 500+ dwellings is c 900 residents, that requires a substantial health and social care resource.
Modifications requested	The Health Impact Assessment needs to be independently done by the NHS integrated Care System to assure social care, primary and secondary care capacity. The threshold of 500+ dwellings needs to be reduced to 250.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Health & Wellbeing
Consultation Point Number	Policy HC 1
Section of the Plan	Policy HC 1 Health & Wellbeing
ID	LPS171
Response Date	23/02/2022 14:20:13
Name	Miss Naomi Chamberlain
Organisation	Norfolk County Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes

Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>The County Council welcomes the inclusion of Health Contributions and the use of the Joint Norfolk Health Protocol as a framework for health professionals and town planners to work together 'to consider matters relating to healthy environments and encourage physical activity, drawing on key guidance such as Building for a Healthier Life and Active Design'</p> <p>The policy sets out that healthcare contributions will be sought on the advice of the Norfolk and Waveney Sustainable and Transformation Partnership where it is advised as a result any specific proposal developer funding to specific health care projects.</p>
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Health & Wellbeing
Consultation Point Number	Policy HC 1
Section of the Plan	Policy HC 1 Health & Wellbeing
ID	LPS610
Response Date	02/03/2022 12:17:00
Name	Ms Kerry Harris
Organisation	Thornage Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>Furthermore, there is an inconsistency between the wording of DDLP para. 5.1.6 ("Planning application for residential developments of all sizes and HIAs ") and the wording of DDLP policy HC1(2) which only requires "major development" (defined in the Glossary as 10 or more dwellings or sites of an 0.5 ha or more) to be informed by the Healthy Planning Checklist. Which is the Council's intention? Is the former merely aspirational then what weight will be given to it unless under-girded by a specific policy reference?</p> <p>Again, for the reasons set out above, the demographic profile of NNDC's population as well as concerns about development viability warrant a more rigorous requirement for residential development of all sizes.</p>

Modifications requested	Therefore, it is requested, in the interests of soundness, if there is a wider policy intention is in para. 5.1.6 (due to NNDC's different demographic profile), then the wording in policy HC1(2) needs to be changed from "Major development" to "Residential development of all sizes and HIAs" [should be informed]. If not, then the qualification in HC1(2) to "major development" needs to be explained or substituted in the supporting text.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

5.2 Provision & Retention of Open Spaces

Consultation Point Title	Provision & Retention of Open Spaces
Consultation Point Number	5.2
Section of the Plan	5.2 Provision & Retention of Open Spaces
ID	LPS223
Response Date	24/02/2022 11:10:00
Name	Ms Sarah Mitchell
Organisation	RSPB
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	RSPB supports this part of the Plan.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Provision & Retention of Open Spaces
Consultation Point Number	5.2
Section of the Plan	Open Spaces, Protection of Trees and Rights of way
ID	LPS14
Response Date	17/01/2022 13:23:00
Name	Mr Ian Watson
Organisation	None
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified	It is not effective

* It is not consistent with national policy	
Explanation	Overall the plan is good. There are three areas of concern, however, which question whether the plan is sound from my perspective. First, there is no mention of registered village greens and how these will be protected/ excluded from development. Second, the strengthening of tree protection is weak. In most areas of North Norfolk trees can be hacked back, pruned to death, or even removed without any planning permission. I live in a beautiful part of the district, Swanton Novers, in the most naturalistic wooded area, but in the village their appears to be no requirement for planning permission to deal with trees. And thirdly, it is good to see a commitment to rights of way, especially footpaths, but the commitment by the council to extend existing provision seems very weak.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

Policy HC 2 Provision & Retention of Open Spaces

Consultation Point Title	Provision & Retention of Open Spaces
Consultation Point Number	Policy HC 2
Section of the Plan	Policy HC 2 Provision & Retention of Open Spaces
ID	LPS73
Response Date	04/03/2022 09:01:00
Name	Ms Emma Stannard
Organisation	Blakeney Hotel
Agent Name	Mr John Long
Agent Organisation	John Long Planning Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<p>SEE ATTACHED FILE</p> <p>The Blakeney Hotel owns an area of land at the northern part of the area known as 'The Pastures' in Blakeney which is sectioned off from the rest of The Pastures area by a substantial fence. The boundary is clearly shown on the OS map base underlying the Local Plan's map. A plan and photographs of the area is submitted with this representation.</p> <p>The Local Plan currently proposes to designate the land in the Hotel's ownership as 'Open Land Area' in the Local Plan, and includes it within the wider Pastures 'Open Land Area' designation. The Local Plan's defines 'Open Land Area' as: "Areas of open space which make an important contribution to the appearance or opportunities for informal recreation in an area"</p> <p>The Blakeney Hotel strongly objects to the Local Plan's inclusion of land in its ownership adjacent to the The Pastures, Blakeney within the Open Land Area's designation. The Blakeney Hotel considers that the area of land in its ownership does not meet the definition of 'Open Land Area'. Importantly, it is not an area of open land; it is enclosed by a substantial fence and is not publicly accessible. It does not form part of the wider open space (known as The Pastures) and has a completely different character and function than the rest of The Pastures. It is not an open grassed area, it is not defined by hedges and trees (it is defined by a wooden fence) it has no mature trees within it. Neither does it make a positive contribution to the landscape character of the wider area. The Hotel wishes to use the land in connection with the Hotel, which would not be permissible under Policy HC 2. This designation and policy significantly restricts the Hotel's ability to make use of the land to support its operation.</p> <p>The Hotel previously used the area of land within the fenced area adjacent to The Pastures for car parking and applied for planning consent for an overspill car parking associated with the Hotel. The car park is needed at busy times, and/or when the Hotel's main car park is affected by the high tide. A planning application for the change of use of the area to car parking was prepared and submitted to North Norfolk District Council. The application was supported by North Norfolk District Council Officers and recommended for approval. The principle of change of use of this area has therefore previously been considered acceptable by North Norfolk Council Officers. Whilst not successful at Planning Committee, or supported by the Parish Council</p>

	<p>at the time, more recent dialogue with Parish Council representatives have indicated that there may be potential for discussions to consider support for parking on the area (as proposed in the previous application), subject to a sensitive landscaping scheme.</p> <p>The Local Plan's proposed designation of the land as Open Land Area would prejudice this positive position being taken forward, in the event that the Parish Council formally confirm their support for a change of use to allow parking in this area.</p> <p>In conclusion, the Local Plan is considered to fail the Justified and effective soundness tests, as the proposed designation of Hotel owned land adjacent to The Pastures is not appropriate, as it is not based on evidence (i.e. the reality of the ownership, character and use of the land); and is not effective as the area of Hotel owned land is not considered to make an important contribution to the appearance and the Hotel has no intention of allowing the public to use the area for informal recreation. The area is needed to support the effective running of the Hotel by providing a potential location for customer car parking.</p>
Modifications requested	<p>SEE ATTACHED FILE</p> <p>To make the Local Plan sound, the Blakeney Hotel suggests that the area of land in its ownership adjacent to The Pastures is excluded from the Blakeney 'Open Land Area' designation, and is either shown as 'White land' with no restrictive designation; or is specifically allocated for Hotel use, including parking. The Blakeney Hotel is content that the rest of The Pastures retains the open space designation as it is different in from, use and character and properly meets the designation's definition.</p>
<p>Appear at examination hearing session(s)?</p> <p>* No, I do not wish to participate in examination hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To further support the Blakeney Hotel's position in respect of land in their ownership adjacent to The Pastures, Blakeney
Attachment(s)	Blakeney Hotel Land adjacent the Pastures Location Plan.pdf Blakeney Hotel Pastures Area 1.jpg Blakeney Hotel Pastures Area 2.jpg
Consultation Point Title	Provision & Retention of Open Spaces
Consultation Point Number	Policy HC 2
Section of the Plan	Policy HC 2 Provision & Retention of Open Spaces
ID	LPS69
Response Date	09/02/2022 16:28:17
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
<p>Do you consider the plan to be Legally Compliant?</p> <p>* Yes</p> <p>* No</p>	No
<p>Has the duty to cooperate been met?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Do you consider the plan to be Sound?</p> <p>* Yes</p> <p>* No</p>	No
<p>Reason(s) not Sound</p> <p>* It is not positively prepared</p> <p>* It is not effective</p> <p>* It is not justified</p> <p>* It is not consistent with national policy</p>	It is not justified
Explanation	'Development on valued open space will not usually be supported'. This should be more strongly worded to discourage loss of alued open space.

Modifications requested	'Development on visually open spaces valued open space will not be supported. This protects important landscape in the countryside and visual amenity in settlements.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Provision & Retention of Open Spaces
Consultation Point Number	Policy HC 2
Section of the Plan	Policy HC 2 Provision & Retention of Open Spaces
ID	LPS175
Response Date	24/02/2022 09:51:41
Name	Miss Naomi Chamberlain
Organisation	Norfolk County Council (Landowner)
Agent Name	
Agent Organisation	NPS Property Consultants
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified; It is not consistent with national policy
Explanation	SEE ATTACHED FILES NPS Property Consultants object to the inclusion of the land at Hempstead Road and A148 (Land off Swan Grove), Holt AGS/HLT02 OSP050 as Open Land Area as the allocation has not been effectively justified and is not consistent with Paragraph 102 of the NPPF. NNDC's response to NCC's previous objection (see attached) to the inclusion of this site as Open Land Area appears to be that the site was designated as open space in the Core Strategy (see page 839 Consultation Statement). However, the area of land was not previously included as an area of open space on the Core Strategy Proposals Maps (adopted 2008) see map extract attached (land highlighted with a blue star). In addition, the designation as amenity green space was undertaken without consultation with the landowner, and it has not been demonstrated to be 'special' to the local community holding a local significance. Therefore, it is not believed that the allocation has been effectively justified or consistent with the Paragraph 102 of the NPPF (see previous response attached). An objection to the soundness of the site designation and plan remains.
Modifications requested	SEE ATTACHED FILES NPS Property Consultants object to the inclusion of the land at Hempstead Road and A148 (Land off Swan Grove), Holt AGS/HLT02 OSP050 as Open Land Area and request this allocation is deleted. The site allocation as Open Land Area would also prejudice the potential to develop the site for an alternative mix of uses which could include car parking, an informal link to the town centre or other developments including an element of formal open space. It is not believed that the allocation has been effectively justified or is consistent with Paragraph 102 of the NPPF. The previous designation as amenity green space was undertaken without consultation with the

	landowner, and it has not been demonstrated to be 'special' to the local community holding a local significance. The site was also not previously allocated as open space in the Core Strategy as suggested by NNDC. The proposed allocation as Open Area Land has not therefore been justified and we would, object to the soundness of the plan.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	We wish to reserve the right to appear at the Examination to explain Norfolk County Council's aspirations for the site, if required.
Attachment(s)	Core Strategy Proposals Map Extract 2008.jpg NPS Response to HC 2 Reg 18.docx
Consultation Point Title	Provision & Retention of Open Spaces
Consultation Point Number	Policy HC 2
Section of the Plan	Policy HC 2 Provision & Retention of Open Spaces
ID	LPS494
Response Date	07/03/2022 18:34:26
Name	
Organisation	Sutherland Homes
Agent Name	Mr Mark Singer
Agent Organisation	Barton Willmore
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	SEE ATTACHED FILE
Modifications requested	SEE ATTACHED FILE
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	Please see representations attached and sent via email
Attachment(s)	220307 Representations to NNDC Draft Local Plan Proposed Submission Version - Two Sites.pdf (3)
Consultation Point Title	Provision & Retention of Open Spaces
Consultation Point Number	Policy HC 2
Section of the Plan	Policy HC 2 Provision & Retention of Open Spaces
ID	LPS672
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	

Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>We welcome a policy that aims to connect people with nature through open spaces and highlight the following recommendations in support of green spaces and infrastructure:</p> <p>Onsite green infrastructure recommendations</p> <p>Natural England recommends that large residential developments of 50 or more include green space that is proportionate to its scale to minimise any predicted increase in recreational pressure to designated sites, by containing the majority of recreation within and around the developed area. The applicant may wish to consider the benchmark standards for accessible natural greenspace; the Town and Country Planning Association (TCPA) have published Guides and Principles for Garden Communities, and Guide 7, Principal 9 (https://www.tcpa.org.uk/guidance-for-delivering-new-garden-cities), references 40% green infrastructure as a target quantum.</p> <p>The Suitable Accessible Natural Green Space (SANGS) guidance (attached below in annex A) can be helpful in designing this; it should be noted that this document is specific to the SANGS creation for the Thames Basin Heaths, although the broad principles are more widely applicable. GI design should seek to achieve the Natural England Accessible Natural Greenspace Standards, detailed in Nature Nearby, including the minimum standard of 2 ha informal open space within 300 m of everyone's home. As a minimum, we advise that such provisions should include:</p> <ul style="list-style-type: none"> • High-quality, informal, semi-natural areas • Circular dog walking routes of 2.9 km within the site and/or with links to surrounding public • rights of way (PRoW) • Dedicated 'dogs-off-lead' areas • Signage/information leaflets to householders to promote these areas for recreation • Dog waste bins • Contribution to the long-term maintenance and management of these provisions <p>To provide adequate mitigation onsite GI should be designed to provide a multifunctional attractive space of sufficient size to reduce frequent visits to designated sites. It should facilitate a variety of recreational activities whilst supporting biodiversity. Evidence and advice on GI can be found on the Natural England Green Infrastructure web pages (https://www.gov.uk/guidance/natural-environment#green-infrastructure). We also recommend the Green Infrastructure Partnership as a useful source of information when creating and enhancing GI.</p>
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Provision & Retention of Open Spaces
Consultation Point Number	Policy HC 2
Section of the Plan	Policy HC 2 Provision & Retention of Open Spaces & Policies Map (Open Land Area)
ID	LPS367

Response Date	06/03/2022 11:47:00
Name	
Organisation	Sheringham House Holdings
Agent Name	Mr Alan Presslee
Agent Organisation	Cornerstone Planning Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified; It is not consistent with national policy
Explanation	<p><u>Policy HC2/Policies Map:</u></p> <p>We object to Policy HC2 and Policies Map insofar as it seeks to identify part of land around Sheringham House, Cremer's Drift, Sheringham (owned by Sheringham House Holdings) as 'an 'Open Land Area'.</p> <p>Paragraph 101 of the NPPF states:</p> <p><i>"The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them."</i></p> <p>Paragraph 102 of the NPPF states:</p> <p><i>"The Local Green Space designation should only be used where the green space is:</i></p> <ol style="list-style-type: none"> 1 a) <i>in reasonably close proximity to the community it serves;</i> 2 b) <i>demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</i> 3 c) <i>local in character and is not an extensive tract of land."</i> <p>However, it is notable that in addition to 'Local Green Space', the Local Plan identifies 'Open Land Areas', which paragraph 5.2.3 of the Plan notes as being "principally 'open' areas of undeveloped land that make a significant contribution to the character of the area".</p> <p>Section 5 of Policy HC2 says: <i>"Development on visually important open spaces including those designated as Open Land Areas and Local Green Spaces on the Policies Map will not usually be supported."</i></p> <p>The Core Strategy of 2008 identifies 'Education and Formal Recreation Areas' and Open Land Areas', but the subsequent NPPF (July 2021) addresses only 'Local Green Space'. The Council's Amenity Green Space Study (April 2019) references – in the main - the term 'Amenity Green Space'.</p> <p>We have reviewed the relevant evidence document (Amenity Green Space Study 2019) and it is not at all clear what the rationale for retaining Open Land Area designation from the 2008 Plan is.</p> <p>The 2008 Core Strategy identified an extensive tract of land extending from Holway Road (to the west), to the southern end of Knowle Road. It is interesting to note that the Amenity Green Space Study identifies this area as 'Morley Hill'. However, the area known as Morley Hill lies to the west of Cremer's Drift. The assessment of the land in the Amenity Green Space Study identifies the entire area – in its provisional recommendation – as 'Amenity Green Space' and offers as a reasoned justification that: <i>"The site is currently private open space which provides a green space within allocated development land and longer views towards Sheringham Park. Through development this allocated site is to provide access to Morey Hill in perpetuity. Planning permission is currently granted on SH06 and SH05"</i>.</p>

	<p>The assessment and thus the proposed identification of a large area as Open Land Area around Sheringham House is ill-founded for a number of reasons:</p> <ul style="list-style-type: none"> • Planning permission granted on site SH05 (8 dwellings) was subject to a S.106 agreement offering Morley Hill to the Town Council for public recreational use in perpetuity. But, that open land (Morley Hill) is entirely to the east of land owned by Sheringham House Holdings (Sheringham House and gardens); • Planning permission on site SH06 (62 later living apartments) bears no relationship (physically, visually or by S.106) to Morley Hill and should not therefore be identified as part thereof; • The land around Sheringham House is not “open space”; these are the grounds of Sheringham House, for use by residents/staff thereof (aside from the site of SH06) and associated managed woodland; • The land around Sheringham House does not meet the definition of Open Land Area given in the Plan: it is not “visually important open space”, nor does it comprise “open areas of undeveloped land that make a significant contribution to the character of the area”. <p>Morley Hill appears to - broadly – meet the definition of Open Land Area in the Local Plan (“<i>principally ‘open’ areas of undeveloped land that make a significant contribution to the character of the area</i>”). The land around Sheringham House does not, and should not therefore be allocated as such. We attach a plan illustrating how we recommend that the Policies Map be modified (area to be excluded from Open Land Area designation under Policy HC2).</p> <p>In conclusion, the proposed allocation of some land in Sheringham (around Sheringham House) as Open Land Area is ill-founded and arbitrary. Some areas identified as such on the Policies Map do not qualify according to the definition in the Plan or the rationale/evidence supporting it.</p> <p>As it stands, the policy/proposed Policies Map is unsound as it neither justified nor consistent with national policy.</p>
Modifications requested	As above/attached plan
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To explain/elaborate
Attachment(s)	Sheringham Open Land Areas 2 Feb 22 Amended v9 (Revised 07.03.22).pdf
Consultation Point Title	Provision & Retention of Open Spaces
Consultation Point Number	Policy HC 2
Section of the Plan	Policy HC 2 Provision & Retention of Open Spaces - Land off Warren Road, High Kelling (OSP195)
ID	LPS358
Response Date	06/03/2022 16:20:00
Name	Mrs Sarah Hurry
Organisation	Rudd Family (Mr & Mrs Rudd, Mr & Mrs Bain, Mr & Mrs Hurry and their children)
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No

<p>Reason(s) not Sound</p> <ul style="list-style-type: none"> * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy 	<p>It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy</p>
<p>Explanation</p>	<p>SEE ATTACHED FILES</p> <p>Thank you for allowing us, the Rudd family, to comment.</p> <p>We object to our curtilages, described as “Land off Warren Road /OSP 195 in being designated proposed “Open Land” and subject to policy HC2 and request this designation is deleted</p> <p>We question the targeting, as there are many neighbouring properties with similar characteristics which have not been designated, as well as other land within the village which would better meet the “Open Land” definition. It is also not justified given the function and existing protection afforded by TPO and other plan policies. It will prejudice our continued use and enjoyment.</p> <p>Fuller evidence to Question 5 is presented in Rudd Family response attached.</p> <p>Extracts also attached (all rights acknowledged):</p> <p>Small Growth Villages Boundary Review 2021 [Map extract attached with High Kelling Social Centre annotated]</p> <p>Amenity Green Space Study 2019 [extract attached]</p>
<p>Modifications requested</p>	<p>SEE ATTACHED FILES</p> <p>Preferred option:</p> <ol style="list-style-type: none"> 1 Delete the “Open Land” designation on “Land off Warren Road” as the inaccessibility, function (including many buildings), existing TPO protection and other policies in the Local Plan make this proposal unjustified, unnecessary and inappropriate for the area it covers. <p>We are open to replacing it, with a specific designation/ policy for wider properties of High Kelling so we are not solely targeted, to reflect the contribution that all the wooded gardens make to the character, but we question if even that is necessary as outlined.</p> <p>Alternative:</p> <ol style="list-style-type: none"> 1 Re-site the route of the boundary of the proposed “Open Land” so it can be clearly understood by physical features on the ground. <p>We would propose the northern boundary is locked to an agreed distance (the width of Bernard Road) from the southern boundary fence to run part-way immediately alongside the bridleway to where it meets our Bridge Road driveway</p> <p>This would ensure the many developed buildings, driveway and the visually inaccessible/unimportant areas of our curtilage are outside the “Open Land” designation as its clearly inappropriate, unjustified and unnecessary for them to be included.</p> <ol style="list-style-type: none"> 1 Delete the “Open land” designation and restore all of High Kelling to countryside.
<p>Appear at examination hearing session(s)?</p> <ul style="list-style-type: none"> * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s) 	<p>Yes, I wish to participate in hearing session(s)</p>
<p>Justification for appearing at hearing</p>	<p>We would welcome meeting the inspector at the hearing session and on site to explain just how unnecessary and inappropriate this “Open Land” designation is, as this cannot be grasped by desk-top studies or description.</p> <p>We can also explain and demonstrate the special character the whole village has with its similar well wooded gardens.</p> <p>We would wish to reserve the right to be represented, if we are unable to be there in person.</p>
<p>Attachment(s)</p>	<p>Extract Amenity Green Space Study 2019.pdf (1) Rudd Family Response.pdf (7) Extract from High Kelling Settlement Map with High Kelling Social Centre (star).pdf (1)</p>
<p>Consultation Point Title</p>	<p>Provision & Retention of Open Spaces</p>
<p>Consultation Point Number</p>	<p>Policy HC 2</p>

Section of the Plan	Policy HC 2 Provision & Retention of Open Spaces - The Pastures, Blakeney (OSP154)
ID	LPS254
Response Date	06/03/2022 20:13:44
Name	Ms Jane Armstrong
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified; It is not consistent with national policy
Explanation	<p>SEE ATTACHED FILES</p> <p>Challenge to the Proposed Submission Version of the North Norfolk Local Plan in respect of Open Land Area OSP154</p> <p>(For ease of reference I attach a formatted PDF version of this representation as "Attachment 3 Copy of Regulation 19 Challenge to OSP154")</p> <p>Introduction</p> <p>I am making the following representation on the Proposed Submission Version of the North Norfolk Local Plan because it does not meet the test of soundness in respect of the proposed designation of Open Land Area OSP154.</p> <p>The area in Blakeney designated as OSP154 and given the name "The Pastures" comprises two separate parcels of land which have been grouped together as an Open Land Area. This designation is not justified as the evidence on which it is based supports the designation of only one of the two separate parcels of land.</p> <p>The southerly parcel of land (to the south of Little Lane) is the garden of 39 New Road. It is of completely different character to the northern parcel (known locally as "The Pastures"). I believe that if each of the two parcels of land had been assessed separately the garden of 39 New Road would not have been designated as an Open Land Area as this designation is not supported by the evidence.</p> <p>My proposed modification is to remove the southern parcel of land (the garden of 39 New Road) from OSP154.</p> <p>I did submit a detailed representation on this matter at Regulation 18 Stage of the Local Plan (attached to this submission as "Attachment 2 Regulation 18 Challenge to OSP154") and the published response (in the Consultation Statement January 2022) to this was: "<i>The review, assessment and designation of open space sites is supported by updated evidence contained in evidence library in the 2018 Amenity Green Space Study.</i>" I have analysed the evidence referred to but have found none which supports this designation and no noticeable change was made to OSP154 in the proposed submission version of the Local Plan or Policies Map.</p> <p>In summary, I believe the Local Plan is unsound because:</p> <ol style="list-style-type: none"> 1 The inclusion of two very different and non-contiguous parcels of land in OSP154 is not justified by evidence. 2 The designation of the private garden of 39 New Road as Open Land Area is not justified by the published evidence. 3 The designation of the private garden of 39 New Road as Open Land Area is not justified by the unpublished assessment form in respect of OSP154 obtained via a Freedom of Information Request.

- 4 The designation of the garden of 39 New Road as Open Land Area appears contrary to both the national policy (NPPF) and the Local Plan policy.

I deal with these four points in turn below.

1 The inclusion of two very different and non-contiguous parcels of land in OSP154 is not justified by evidence

1.1 OSP154 (named as “The Pastures” in the draft plan) comprises two separate parcels of land which are separated by a roadway (Little Lane). As well as being separate from one another, they are also very different from one another and I believe that they should have been assessed individually. I summarise the differences below:

- The two parcels of land are not contiguous with one another (ie the designation does not wash over Little Lane).
- The Pastures is publicly accessible with multiple access points and is highly used - the garden of 39 New Road is private.
- The Pastures is the subject of a Parish Council managed Trust - the garden of 39 New Road is in private ownership.
- The Blakeney Conservation Area Appraisal (2019) recognised several “Significant Green Spaces”. The Pastures is one of these but the garden of 39 New Road is not.
- The Pastures is mainly laid to grass with a few trees and has an open nature - the private garden of 39 New Road is surrounded by hedges and includes normal garden features including driveway, shrubs, flower beds, fruit trees and bushes, kitchen garden, car and boat parking, etc. In short, it is a private garden.

1.2 Further, OSP154 appears to be the only Open Land Area designation in the whole draft plan to consist of two separate, non-contiguous parcels of land within a single designation. There is no apparent reason for this unique treatment which seems to be at odds with the process followed in all other Open Land Area assessments. In fact, there are several examples where areas have been split into two or more designations when it could have seemed logical to combine them. For example:

- In Melton Constable there are two areas of Allotments which have the same function, similar appearance and also share a boundary (ie they are contiguous) but they have been designated separately as OSP168 and OSP169.
- In West Runton there is an area which, despite appearing to be a single area of fairly uniform common land is separated into 5 designations (OSP203-207 inclusive) in recognition of the roadways which divide it.
- In Fakenham the former railway line known as the Great Eastern Way is divided into two designations: OSP037 and OSP038. This example is particularly striking because, despite the two sections appearing on a map to be separated by Holt Road, the Great Eastern Way itself, in a cutting at this point, is uninterrupted and continues under the Holt Road (under a bridge).

1.3 To conclude, the two parcels of land in OSP154 should have been assessed separately as they are very different to one another. There is no justification for treating these two parcels of land as a single designation and it is inconsistent with the process followed elsewhere in the Local Plan.

1 The designation of the private garden of 39 New Road as Open Land Area is not justified by the published evidence

2.1 A **factual description** of the garden of 39 New Road is:

- The garden is private, there is no public access and it is privately owned. It is surrounded by hedges with very limited views into the garden.
- It is separated from The Pastures by Little Lane and by the two mature hedges which border, respectively, the garden and The Pastures.
- The character of this parcel of land is that of a private domestic garden. It has areas of grass, fruit trees and bushes, shrubs, kitchen garden, driveway, car and boat parking, etc.

2.2 The **published assessment** of this area in the NNDC Amenity Green Space Study April 2019 (in which the reference for this area is AGS/BLA01) is:

“Accessible and highly valued amenity green space centrally located within the settlement. Forms a defining edge and green setting to the historic village core and gives a degree of separation from the later development to the south. Highly significant being one of the few areas of open space within the Conservation Area. There is a significant visual quality to the site and also in its visual connection with the two sites to the south. Long range contextual views from the site to the

coast are noteworthy. Collectively forms an important part of the notable composite green space within the settlement.”

The paragraph above is the full extent of published evidence to support the designation of OSP154 so I have examined it in some detail and would make the following comments on it:

2.3 *“Accessible and highly valued amenity green space...”*

This can only be referring to the northern parcel of land as it does not acknowledge that the southern parcel (comprising about 20% of the whole) offers no public access or amenity space.

2.4 *“...defining edge and green setting to the historic village core and gives a degree of separation from the later development to the south.”*

This description is inaccurate in respect of both parcels of land within OSP154: The Blakeney Conservation Area Appraisal (2019) provides mapping of the buildings in Blakeney's Conservation Area by age and distinguishes between pre and post 1952. According to this map, before 1952 the area of OSP154 was surrounded to the north, east and south by a wide tract of undeveloped land. Most of this land, including that *“...to the south...”*, was subsequently developed around the same time in the late 20th and early 21st centuries. Thus the OSP154 area is mostly surrounded by recent development – it does not adjoin *“the historic village core”* so it cannot *“form a defining edge”* to it. Neither does it give *“...a degree of separation from later development to the south...”* because the development to the south was not later than that to the north or east. (In fact, much of the development to the south pre-dates that to the north and east.) The only place where OSP154 could be said to be close to the *“...historic village core...”* is the north western corner of OSP154 where the gardens of a couple of 18th century cottages on Westgate Street abut the northern parcel of land.

2.5 *“...one of the few areas of open space within the Conservation Area...”*

It would be surprising if there were **more** than a **few** areas of open space within Blakeney's Conservation Area as the area is quite small. Nonetheless, there are various other open spaces within Blakeney's Conservation Area (as identified in the Blakeney Conservation Area Appraisal 2019) including Friary Hills, the Quay, the Carnser, Mariners Hill and the area around St Nicholas' Church. Therefore, to note that OSP154 is *“...one of the few areas of open space within the Conservation Area...”* is hardly evidence to support the designation of the two parcels of land within OSP154.

2.6 Open space in Blakeney is not limited to that within the Conservation Area. The North Norfolk Open Space Assessment (2019) conducted an audit of open space in North Norfolk and compared the amount in each settlement against quantity standards of various types of open space per 1,000 of population. In Blakeney, it found significantly more than the standard quantity of most types of open space. For example, the standard of “Amenity Greenspace” per 1,000 of population is 1.00 hectare, Blakeney has 3.52 hectares. The standard of “Accessible Natural Greenspace” per 1,000 of population is 1.50 hectares, Blakeney has a staggering 488.20 hectares! The amount of recreation ground and play areas in Blakeney is also well in excess of the standards.

2.7 *“There is a significant visual quality to the site...”*

There is no elaboration on this statement. In my opinion, the northern parcel of land with its open access, parkland setting, trees and paths and defined edge is an important and attractive open space in Blakeney. In contrast, the southern parcel of land, a private garden surrounded by mature hedges, provides little *“...significant visual quality...”* as visibility into it from public spaces is limited.

2.8 *“...visual connection with the two sites to the south.”*

When standing in the middle of the publicly accessible northern parcel of land there is clearly a strong visual connection, with the *“...two sites to the south...”* (OSP155 and OSP156) which gives an open and connected feel, partly due to the topography. However, from this same point in the northern parcel of land there is no comparable visual connection with the garden of 39 New Road because it is largely obscured by the hedges on both sides of Little Lane. Further there is little visual connection from OSP155 and OSP156 to the garden of 39 New Road. Blakeney Conservation Area Appraisal draws attention to noteworthy views within the village. One of these views is looking north west from the northern parcel of land in OSP154 – no view into the garden of 39 New Road is noted. Thus this part of the description would appear to apply only to the northern parcel of land in OSP154 and does not apply to the garden of 39 New Road.

2.9 *“Long range contextual views from the site to the coast are noteworthy...”*

This comment clearly relates to the northern parcel of land and the view noted in the Blakeney Conservation Area Appraisal. As there is no public access to the garden of 39 New Road, any view from it is not relevant to the assessment.

2.10 *“Collectively forms an important part of the notable composite green space within the settlement”*. There is no further explanation of the *“composite green space”*. This would appear to refer to the close proximity of OSP154 to OSP155 and OSP156 and to the views between certain parts of these spaces as noted above in 2.8. I examine *“composite green space”* further below at 3.5.

2.11 The **Local Plan Policies Map (Proposed Submission Version)** is a further source of **published assessment** in respect of OSP154. This map shows the exact extent of the southern parcel of land and I would make the following comments:

2.12 The shape of the southern parcel of land has an *“extension”* to the east which almost reaches to the front door of 39 New Road for no apparent reason. This would suggest that the extent of the proposed designation was not reviewed at the time of the Amenity Green Space Strategy Study but was simply carried over from the Core Strategy of 2008 which, itself, was carried over from the previous plan. In 2015, in the course of determining a planning application on this site, the NNDC Case Officer endeavored to find reasons/evidence for the designation of this area as CT1 Open Land Area. He was unable to find any evidence.

2.13 Around the same time the NNDC Head of Planning Policy, Mark Ashwell, stated that the open areas which became CT1 were designated in many settlements during the 1990s. NNDC’s Statement of Housing Land Supply & Housing Trajectory (April 2016) supports this explanation. Under **8. The Local Supply of Housing Development Land** it notes that *“Historically for a number of years the Council has applied land use policies that have constrained the opportunities for new residential development. This approach arose as a result of relatively high levels of new house building in the 1980s and early 1990s and a concern that if such trends were allowed to continue dwelling completions in the district would exceed the requirement of the then adopted Structure Plan.”* It appears, therefore, that the garden of 39 New Road was one of many spaces designated in order to constrain residential development rather than because of its intrinsic value as an open space. No evidence has come to light that an assessment of the area was carried out at the time of the original designation and there is still no evidence to support this area’s designation as Open Land Area.

2.14 *“Although the site falls within a Conservation Area, it is not considered development would harm the heritage townscape.”*(HELAA 2017)

The above quote is taken from the 2017 HELAA which assessed the garden of 39 New Road for development. It also noted that the garden *“is in a sensitive landscape...development proposals should reflect this and protect the quality and character of Blakeney.”* The HELAA concluded that *“the site is considered to be suitable.”* These comments make clear that the HELAA did not consider that it was important for the heritage townscape that the garden remains in its current form.

2.15 In conclusion, I would suggest the **published** assessment of OSP154:

- a) does not contain evidence to support the designation of the garden of 39 New Road as Open Land Area.
- b) acknowledges that the garden of 39 New Road is suitable for development.

1 The designation of the private garden of 39 New Road as Open Land Area is not justified by the unpublished information obtained via a Freedom of Information Request.

3.1 In the (published) Amenity Green Space Study, April 2019, Appendix B showed a blank *“Amenity Space Assessment Proforma”* which, the document explained, was used when reviewing *“existing designated sites”* via site visits in the Autumn of 2017. This form *“was completed for each site, designed to record essential site characteristics, appearance, accessibility, visibility as well as any other observations around the qualitative nature of the site.”* The completed proformas have not been published in the Local Plan Document Library, therefore, I made a Freedom of Information Request in respect of the **“Amenity Space Assessment Proforma” for OSP154.**

3.2 This Proforma, in a table format, is attached to my submission (*“Attachment 1 Amenity Space Assessment Proforma”*). I have added

a column to the right of the table in which I have commented on the data provided, its accuracy and to what extent it applies to 39 New Road. I note some of the points below:

3.4 Under the heading “**Current Use**” the form notes that “*A section of the designated area to the south-east is private garden land, recently planted with orchard trees and a boundary hedge. Although private, this still functions as a part of the composite green space.*”

This is the only specific mention of the garden of 39 New Road that I have found (although it comprises about 20% of the area of OSP154). Thus, the designation as Open Land Area appears to rest on the statement: “*...Although private, this still functions as a part of the composite green space.*” I, therefore, examine this point in detail:

3.5 There are three designated Open Land Areas (OSP154, OSP155 and OSP156) in fairly close proximity to one another in Blakeney but separated from one another by roads, hedges, etc. As outlined above, (2.8) there is a distinct visual connection between certain parts of these designated areas which would appear to support the view that these areas relate to one another as a “*...composite green space.*” The assertion that the garden of 39 New Road “*...Although private, (this) still functions as a part of the composite green space*” is not explained nor is it supported by evidence. It appears that the garden of 39 New Road may be being designated as an Open Land Area solely because it is located close to other Open Land Areas in the “*...composite green space.*” I would suggest that proximity to other Open Land Areas alone is not adequate evidence to support designation as Open Land Area.

3.6 Under the heading “**Access**” the form notes that the site has public access with multiple access points. This is incorrect as it does not mention the garden of 39 New Road to which there is no public access.

3.7 Under the heading “**Visibility**” the form notes that the site is highly visible from surrounding housing and from green spaces to the south.

This is incorrect in respect of the garden of 39 New Road which has no open space to its south. There is some visibility from nearby houses.

3.8 Also under the heading “**Visibility**” mention is made of the views out of the site towards the playing fields and saltmarshes. Any view from the garden of 39 New Road is irrelevant to the assessment as this is a private area.

3.9 Under the heading “**Use**” the form notes that the site is regularly and frequently used by people of all ages including for dog walking. This is incorrect in respect of the garden of 39 New Road.

3.10 Under the heading “**Maintenance**” the form notes the area is maintained by mowing grass, providing benches, litter bins and dog bins.

This is incorrect in respect to the garden of 39 New Road.

3.11 The form recommends that the area (now known as OSP154) should be designated as Amenity Green Space and, under the heading “**Justification**”, it lists the site’s following qualities: easy access; value for informal recreation; sense of tranquility and beauty; ecological connection with other green space; long range views to the coast; defining edge to the historic village core.

With the exception of “ecological connection with other green spaces” I have already considered each of the points above and demonstrated how they either, do not apply to the garden of 39 New Road or are incorrect. In respect of “ecological connection with other green spaces” Clearly there is ecological connection between areas, albeit bisected by roads. Many private gardens add to the ecological infrastructure. I would suggest that this is not evidence for the garden of 39 New Road to be designated as an Open Land Area.

3.12 The form also notes that the site is the subject of a local Charitable Trust established in 1999. This is correct in respect of the northern parcel of land “The Pastures” (except for the small area owned by Blakeney Hotel and fenced off). However, it fails to mention the fact that the southern parcel of land is privately owned and not a subject of the Trust.

3.13 In view of all the above, I conclude that the designation of the private garden of 39 New Road as Open Land Area is not justified by the unpublished Amenity Space Assessment Form obtained via Freedom of Information Request.

1 The designation of the garden of 39 New Road as an Open Land Area appears contrary to both the national policy (NPPF) and the North Norfolk Local Plan policy

4.1 The NPPF and the North Norfolk Local Plan both define “Open Space” as:

“All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.”

4.2 This definition appears to stipulate that, to be an “Open Space”, the area must provide “opportunities for sport and recreation”. In order to provide such opportunities the area, clearly, must offer access. The definition recognises that a space **may also** provide visual amenity but this seems to be an additional quality rather than an alternative to the requirement to “offer important opportunities for sport and recreation”.

4.3 The North Norfolk Local Plan’s definition of Open Space goes on to explain that the Draft Local Plan designates three types of Open Space: Open Land Areas; Formal Education and Recreation Areas; and Local Green Space. Each of these three designations, which are subsets of Open Space, is given a separate definition in the glossary of the Draft Local Plan.

4.4 The North Norfolk definition of “Open Land Area” in the Local Plan is:

*“Areas of open space which make an important contribution to the appearance **or** opportunities for informal recreation in an area.”*

4.5 I make several observations on these definitions:

- The NPPF / North Norfolk Local Plan definition of “Open Space” prioritises “important opportunities for sport and recreation” and emphasizes this with the use of the word “important”. It goes on to add that areas also “...can act as a visual amenity.”
- The North Norfolk Local Plan definition of “Open Land Area” appears to reverse these priorities by defining it as “Areas of open space which make an important contribution to the appearance” of an area **or may** offer “opportunities for informal recreation”. Further, the word “important” is used to describe “appearance” rather than “recreation”. No reason is given for this change in priorities or emphasis.
- In respect of the NPPF / North Norfolk Local Plan definition of “Open Space”, the garden of 39 New Road does not appear to meet this definition as there is no public access so it cannot provide “...important opportunities for sport and recreation...”. Thus the garden does not appear to meet the definition of “Open Space”.
- In respect of the North Norfolk Local Plan definition of “Open Land Area”, no evidence is provided to support the idea that the garden of 39 New Road might make an “important contribution to the appearance” of the area. The lack of public access to the garden means that it clearly provides no “opportunities for informal recreation”. Thus it does not appear to meet the Local Plan’s definition of “Open Land Area”.

4.6 I have researched how the Open Land Area designation has been applied in practice by looking at which areas are being proposed as Open Land Areas. I have found that almost all the Open Land Areas designated (according to the Amenity Green Space Study) meet the NPPF / North Norfolk Local Plan definition of Open Space as they offer access and, hence, opportunity for sport and recreation. The **only** proposed Open Land Area in North Norfolk which I have found which does **not** offer access and, so, does **not** provide opportunity for sport and recreation, and therefore appears **not** to meet the open space definition is the garden of 39 New Road.

4.7 In the Amenity Green Space Study, there are many examples of areas which have been discounted as Open Land Areas **because** they do not offer public access. These include:

- p 30, ref LGS/NW24 “The site does not meet the tests for LGS or AGS. It is currently a grouping of domestic gardens.”
- p 33, ref AGS/SHR02/A “... The site no longer has public access. Consequently, this area is considered is (sic) no longer functioning as public amenity space.”
- p 42, ref AGS/WEL07 “The site appears to be the remnants of part of a large garden of one of the historic houses. There is no public access to the site or views into it. The site is enclosed by neighbouring properties and a high fence on Northfield Lane. The site does not function as open space.”
- p 71, ref AGS/MUN08 “Essentially private lawn to 2 market houses built in 2004. Hidden from view by tree’d boundary.”

	<p>4.8 In summary, I would suggest that it is inappropriate for the garden of 39 New Road to be designated as Open Land Area because it offers no opportunity for recreation and no evidence has been presented to indicate that it makes an important contribution to the appearance of the area. Thus, it does not appear to be in accordance with national policy or with Local Plan policy.</p> <p>Conclusion</p> <ul style="list-style-type: none"> The consideration of two very different areas – the garden of 39 New Road and The Pastures - as a single designation is not justified by evidence. The designation of the garden of 39 New Road as Open Land Area is not supported by evidence. The designation of the garden of 39 New Road appears contrary to national and Local Plan policy. <p>Therefore, the plan is unsound in respect of this designation.</p>
Modifications requested	<p>SEE ATTACHED FILES</p> <p>Modification</p> <p>The extent of OSP154 should be revised by removing the southern parcel of land (the garden of 39 New Road) from the designation. There is no need to redraw the northern parcel of land or to rename this parcel as this accurately defines what is known locally as “The Pastures”. This modification would not require any change to the wording of the Local Plan itself, just a change to the Policies Map.</p> <p>I believe that removing the southern parcel of land from the designation would make the Local Plan sound because the remaining part of OSP154, ie the northern parcel of land:</p> <ul style="list-style-type: none"> is justified by the evidence provided and, meets the national definition of Open Space so is consistent with national policy. <p>Thus, removing the southern parcel of land from OSP154 would mean that, in respect of this designation, the Local Plan meets the test of soundness in respect of both justification and consistency with national policy.</p>
<p>Appear at examination hearing session(s)?</p> <p>* No, I do not wish to participate in examination hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	I am willing to participate in a hearing session if a hearing is deemed necessary.
Attachment(s)	Attachment 1 Amenity Space Assessment Proforma.pdf (6) Attachment 2 Regulation 18 Challenge to OSP 154.pdf (4) Attachment 3 Copy of Regulation 19 Challenge to OSP154.pdf
Consultation Point Title	Provision & Retention of Open Spaces
Consultation Point Number	Policy HC 2
Section of the Plan	Policy HC 2 Provision & Retention of Open Spaces - The Pastures, Blakeney (OSP154)
ID	LPS328
Response Date	06/03/2022 19:19:52
Name	Mr Alistair Lindop
Organisation	
Agent Name	
Agent Organisation	
<p>Do you consider the plan to be Legally Compliant?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Has the duty to cooperate been met?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Do you consider the plan to be Sound?</p> <p>* Yes</p> <p>* No</p>	No

<p>Reason(s) not Sound</p> <ul style="list-style-type: none"> * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy 	<p>It is not justified; It is not consistent with national policy</p>
<p>Explanation</p>	<p>Open Land Area OSP154</p> <p>The designation of Open Lane Area OSP154 is not sound. There are two very different areas within OSP154 but they are considered as one. One of these areas, the garden of 39 New Road is not justified by evidence for Open Land Area designation.</p> <p>How different are these two areas?</p> <p>I would like to highlight the differences between the two areas within the Open Land Area designation OSP154 in Blakeney. One area is The Pastures and the other is the garden of 39 New Road (my garden).</p> <p>The Pastures is an attractive, well used, public, open space. It should have been designated as Local Green Space if NNDC had correctly applied the NPPF Local Green Space designation criteria. When assessing it for Local Green Space designation NNDC fully recognised it had the qualities of a Local Green Space but misinterpreted the NPPF and excluded The Pastures because it was already designated as an open land area! Designation as an open land area is clearly not a reason to exclude an area from designation for Local Green Space. However, what this does show is that The Pastures is indisputably recognised in the assessment as a demonstrably special space to the local community which offers opportunities for sport and recreation.</p> <p>This contrasts with the garden of 39 New Road which is a private garden behind tall hedges, adjacent to a number of other gardens, Little Lane and Sheila's Way path. It's a private garden.</p> <p>It can be seen from this that these two areas are of an entirely different nature to one another, unconnected and should not have been considered as a single area for designation. No explanation for the joint consideration is given.</p> <p>Lack of evidence to support designation of my garden</p> <p>I have looked at the evidence to support the designation of OSP154 and it is extensive. However, it all relates to the publicly accessible open area known as the Pastures. None of it relates to the garden of 39 New Road so there is nothing I can say about it.</p> <p>Boundary of designated area OSP154</p> <p>I would also like to draw attention to the boundary of OSP154 in respect of my garden. Open land policy has clearly changed massively since the 1990s as has the nature of the area with the growth of hedges, trees and buildings and yet the boundary of the area designated just so happens to have remained precisely the same! I am not aware that anyone from NNDC has come to visit the property, little of which is visible from any public space. It seems that the boundary has not been reviewed at all, simply carried forward from previous Local Plans.</p> <p>Further evidence that the boundaries of Open Land Area designations in general have not been reviewed in Blakeney can be seen from the boundary of the nearby Blakeney Playing Fields OSP155 which encompasses part of a neighbouring garden (Spring Cottage, Langham Road). The area encompassed was part of the playing fields back in the 1990s, I think, before the house was even built, and yet the boundary of the designated area has remained unchanged.</p> <p>In summary, the boundary of the designation OSP154, which includes the garden of 39 New Road, relates to a policy from a different time, it has not been reviewed in the new Local Plan.</p> <p>Non conformity with National Policy</p> <p>As outlined above, these two areas are entirely different: one offers opportunity for sport and recreation, in line with the NPPF Open Space definition, the other, the garden of 39 New Road, does not.</p> <p>Summary</p> <p>In view of the above, the Proposed Submission Version of the North Norfolk Local Plan is unsound as the designation of the garden of 39 New Road as part of OSP154 is not supported by any evidence and it is contrary to national policy.</p>
<p>Modifications requested</p>	<p>The Policies Map needs to be amended by removing the garden of 39 New Road from the Open Land Area designation OSP154.</p> <p>The remaining area of OSP154 (The Pastures) is justified by the evidence and the Local Plan will, therefore, be sound which is not the</p>

	case at the moment with the inclusion of the garden of 39 New Road as Open Land Area.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	I don't think it should be necessary for this to go to a hearing but if the Inspector deems it should then I would like the opportunity of presenting my case.
Attachment(s)	

5.3 Provision & Retention of Local Facilities

Consultation Point Title	Provision & Retention of Local Facilities
Consultation Point Number	5.3
Section of the Plan	5.3 Provision & Retention of Local Facilities
ID	LPS282
Response Date	01/03/2022 11:08:08
Name	Mrs Clare Stagg
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	<p>As a resident to East Runton I am keen to ensure protection of all of the current village amenity.</p> <p>I have found this form quite complex to use and not user friendly so i am sorry if this is not in the correct places.</p> <p>However I am keen to ensure any policy protects all current village amenity - in terms of retail and A4 use and takeaway. We have the fishing boat, Sammy's (currently in for change of use), bernies, a fish and chip take away and the village shop and the butchers.</p> <p>We have lost in the last few years the Village tea rooms with associated shop, the Kit Bag and the Constantia. To preserve village amenity, tourism and employment i would like the plan to suport new retail/A4 uses, and enshrine in policy of strong protections of what is existing.</p> <p>This supports local use and is environmentally friendly in so far as not requiring village residents to have to drive to other locations - and supports tourism - the village is on the coastal path and creates local employment.</p> <p>Housing where developed should focus on affordable housing for locals - not second homes. There is limited need and what need there is surely is for locals.</p>
Modifications requested	As such i would like the policy to be strengthened so it protects existing amenity and allows for reasonable expansion and housing is for locals who will reside full time in the village
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

Policy HC 3 Provision & Retention of Local Facilities

Consultation Point Title	Provision & Retention of Local Facilities
Consultation Point Number	Policy HC 3
Section of the Plan	Policy HC 3 Provision & Retention of Local Facilities
ID	LPS174
Response Date	23/02/2022 14:34:50
Name	Miss Naomi Chamberlain
Organisation	Norfolk County Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	The County Council supports Local Plan policies which aim to protect the rural economy and services/facilities such as public houses, local shops, and valued facilities, as set out in Policy HC 3.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Provision & Retention of Local Facilities
Consultation Point Number	Policy HC 3
Section of the Plan	Policy HC 3 Provision & Retention of Local Facilities
ID	LPS325
Response Date	03/03/2022 18:57:00
Name	
Organisation	Kelling Estate LLP
Agent Name	Roger Welchman
Agent Organisation	Armstrong Rigg Planning
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective	

* It is not justified * It is not consistent with national policy	
Explanation	SEE ATTACHED FILE
Modifications requested	SEE ATTACHED FILE
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	8. Policy HC3 - Representation to Regulation 19 Version of North Norfolk Local Plan.pdf
Consultation Point Title	Provision & Retention of Local Facilities
Consultation Point Number	Policy HC 3
Section of the Plan	Policy HC 3 Provision & Retention of Local Facilities
ID	LPS251
Response Date	25/02/2022 08:40:40
Name	Mr Tom Clarke MRTPI
Organisation	Theatres Trust
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	<p>Whilst we are supportive of the thrust of this policy, we consider it should be refined in order to enhance its effectiveness.</p> <p>Under part 2.a we recommend the text is edited to refer only to a facility being re-provided rather than there being another another similar facility being available, otherwise part b. could be bypassed. For example there may be two similar facilities within reasonable proximity, but they serve purposes and/or communities that could not realistically be accommodated by the other.</p> <p>With regards to part b.b, we consider that viability may be too narrowly defined. A facility may be unviable in a full commercial sense but could be viable under alternative models such as community ownership and not-for-profit. We therefore suggest an edit to the wording.</p>
Modifications requested	<p>We suggest the following amendments in order to improve the effectiveness of the policy as cited above and to enhance protection for the district's valued facilities:</p> <p>a. the facility is being re-provided to at least an equivalent standard in a location accessible to existing users and made available prior to loss of the existing facility</p> <p>b.</p> <p>b. a viability test has demonstrated that the use is no longer viable and could not be made viable under alternative models of operation</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)

Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Provision & Retention of Local Facilities
Consultation Point Number	Policy HC 3
Section of the Plan	Policy HC 3 Provision & Retention of Local Facilities
ID	LPS640
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	<p>2. Development proposals that would result in the loss of premises currently, or last used for, important local facilities(1) will not be permitted unless:</p> <p>a. alternative provision of an equivalent or better quality facility is available in the vicinity or will be provided and made available prior to commencement of redevelopment;</p> <p>or b. it can be demonstrated that there is no reasonable prospect of retention of the facility; and, if it is a commercial operation:</p> <p>a. it has been marketed for a period of at least 12 months;(2)</p> <p>b. a viability test has demonstrated that the use is no longer viable; and,</p> <p>c. that all reasonable efforts have been made to sell or let the property at a realistic market price(3).</p> <p>This does not meet the "Effective" test of soundness.</p> <p>This fails to protect the needs of local people, as there is the potential for key services to be lost.</p> <p>It also fails to consider the implications for development plans if a local facility closes – for example, the presence of a shop in Weybourne identifies the village as a "small growth village"; if this closes, it will have an impact on the development value of the village, as residents will have to travel to meet all their shopping needs, putting increased pressure on the road network (as public transport is inadequate).</p>
Modifications requested	<p>The facility should be offered to the community to run. There are many examples of successful community-run shops, for example.</p> <p>The Plan should take into account the impact of the closure of a key service or facility, with changes to the permitted level of development if the closure effectively moves the settlement into a different development category</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Provision & Retention of Local Facilities
Consultation Point Number	Policy HC 3

Section of the Plan	Policy HC 3 Provision & Retention of Local Facilities
ID	LPS755
Response Date	07/03/2022 22:51:00
Name	Ms Anna McComb
Organisation	NHS Property Services
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>NHSPS manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable, modern healthcare and working environments. NHSPS has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it. Any savings made are passed back to the NHS.</p> <p>Overview</p> <p>In April 2013, the Primary Care Trust and Strategic Health Authority estate transferred to NHSPS, Community Health Partnerships and NHS community health and hospital trusts. All organisations are looking to make more effective use of the health estate and support strategies to reconfigure healthcare services, improve the quality of care and ensure that the estate is managed sustainably and effectively. NHSPS support NHS commissioners to deliver a local health and public estate that can be put to better use. This includes identifying opportunities to reconfigure the estate to meet commissioning needs, as well as opportunities for delivering new homes (and other appropriate land uses) on surplus sites.</p> <p>The ability to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be allowed to develop, modernise or be protected in line with integrated NHS strategies. Planning policies should support this and be prepared in consultation with the NHS to ensure they help deliver estate transformation.</p> <p>Our comments on the policies set out within the Proposed Submission Version of the North Norfolk Local Plan (Regulation 19 Publication) Consultation are as follows.</p> <p>In order to enable the NHS to be able to promptly adapt its estate to changing healthcare requirements, it is essential that all planning policies enable flexibility within the NHS estate. On this basis, NHSPS would advise the Council that policies aimed at preventing the loss or change of use of community facilities and assets, where healthcare is included within this definition, can have a harmful impact on the NHS's ability to ensure the delivery of facilities and services for the community. Where such policies are overly restrictive, the disposal of surplus and unsuitable healthcare facilities for best value can be prevented or delayed, which in turn delays vital re-investment in the NHS estate.</p> <p>The NPPF is clear in stating that Local Plans should adopt policies that "take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community" (Paragraph 93b).</p> <p>It is important that policies consider that some public service providers, such as the NHS, routinely undertake strategic reviews of their estates. Reviews of the NHS estate are aimed at improving the provision of healthcare services by increasing efficiencies, including through the</p>

	disposal of unneeded and unsuitable properties. This means that capital receipts from disposals, as well as revenue spending that is saved, can be used to improve facilities and services.
Modifications requested	Where it can be demonstrated that health facilities will be changed as part of a wider NHS estate reorganisation programme it should be accepted that a facility is neither needed nor viable for its current use. Policies that prevent the loss or change of use of community facilities and assets, where healthcare is included within this definition, can hinder the NHS's ability to ensure the delivery of facilities and services for the community.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

5.4 Infrastructure Provision, Developer Contributions & Viability

Consultation Point Title	Infrastructure Provision, Developer Contributions & Viability
Consultation Point Number	5.4
Section of the Plan	5.4.5
ID	LPS298
Response Date	02/03/2022 17:33:41
Name	Miss Naomi Chamberlain
Organisation	Norfolk County Council (Senior Planner)
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	The County Council welcomes the direct reference to its Planning Obligation Standards.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Infrastructure Provision, Developer Contributions & Viability
Consultation Point Number	5.4
Section of the Plan	5.4.8
ID	LPS642
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective	It is not justified

* It is not justified * It is not consistent with national policy	
Explanation	<i>5.4.8 The National Planning Policy Framework indicates that affordable homes should not normally be required on schemes of 10 or fewer dwellings or site areas less than 0.5 hectares except for in Designated Rural Areas where, a lower site size threshold is applied(66). Much of North Norfolk is designated as a Rural Area and in light of the high need for affordable homes the Council will seek affordable housing on schemes in this area which propose six or more dwellings.</i> This clause does not meet the "Justified" test of soundness. This clause appears to contradict the rest of the Local Plan: elsewhere in the document it specifies that there won't be development in the rural area.
Modifications requested	The Local Plan should exclude developments in the rural area apart from social housing.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Infrastructure Provision, Developer Contributions & Viability
Consultation Point Number	5.4
Section of the Plan	5.4.1
ID	LPS529
Response Date	03/03/2022 11:04:00
Name	Mr Thomas Clare
Organisation	NHS Norfolk & Waveney CCG (ICS Estates)
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	We note that you have made reference to the National Planning Policy framework, the Local Planning in Health Protocol and contributions sought from developers to support health infrastructure. I would like to draw your attention to the wording around the Norfolk and Waveney Sustainable and Transformation Partnership (STP), this is now recognised as the Norfolk and Waveney Integrated Care System (ICS), which will come in to legal effect from July 2022.
Modifications requested	Any reference to the STP should now be replaced with the ICS. I would also like to inform you that the Planning in Health protocol referred to in the plan is currently under review in case you would like to reference it being updated in the plan.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	

Attachment(s)	
Consultation Point Title	Infrastructure Provision, Developer Contributions & Viability
Consultation Point Number	5.4
Section of the Plan	5.4 Infrastructure Provision, Developer Contributions & Viability
ID	LPS641
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<i>The purpose of the policy is to set out the strategic approach to ensure that all of the social, physical and green infrastructure, which is necessary to make development acceptable is provided in a timely manner as development takes place. It sets out the approach to developer contributions to support infrastructure delivery whilst ensuring development viability across the District and that there is transparency in the process.</i> This is an excellent clause, ensuring that developers are obliged to provide the facilities which are in the planning approval.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Policy HC 4 Infrastructure Provision, Developer Contributions & Viability

Consultation Point Title	Infrastructure Provision, Developer Contributions & Viability
Consultation Point Number	Policy HC 4
Section of the Plan	Policy HC 4 Infrastructure Provision, Developer Contributions & Viability
ID	LPS50
Response Date	18/02/2022 14:01:49
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	The timing of providing infrastructure for developments (eg doctors surgeries, schools, roads) is critical. It should be in place before the development is built. Otherwise there is intolerable pressure on infrastructure for both the existing and additional population. Point 6 re viability 'proposals which don't have a viability assessment will be assumed to be fully policy compliant'. Is that wise?
Modifications requested	The delivery of adequate additional infrastructure should precede the development not align with. Amend Point 6 re viability to, 'proposals which don't have a viability assessment will not be assumed to be fully policy compliant'
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	The delivery of infrastructure should precede the development not align with. This will provide services for new residents. Point 6 re viability, 'proposals which don't have a viability assessment will not be assumed to be fully policy compliant'.
Attachment(s)	
Consultation Point Title	Infrastructure Provision, Developer Contributions & Viability
Consultation Point Number	Policy HC 4
Section of the Plan	Policy HC 4 Infrastructure Provision, Developer Contributions & Viability
ID	LPS170
Response Date	23/02/2022 14:35:36
Name	Miss Naomi Chamberlain
Organisation	Norfolk County Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes	Yes

* No	
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	The County Council welcomes policy HC 4 and the recognised importance of delivering infrastructure in a timely manner.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Infrastructure Provision, Developer Contributions & Viability
Consultation Point Number	Policy HC 4
Section of the Plan	Policy HC 4 Infrastructure Provision, Developer Contributions & Viability
ID	LPS130
Response Date	21/02/2022 15:24:11
Name	Mrs Gemma Harrison
Organisation	Holt Town Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Holt Town Council support this policy. Holt Town Cllrs all agreed that the timing of providing infrastructure for developments is critical. Concerns were raised regarding point 6 as Cllrs hoped that all developments should be made to have a viability assessment.
Modifications requested	Amend to include "all developments to have a viability assessment"
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Infrastructure Provision, Developer Contributions & Viability

Consultation Point Number	Policy HC 4
Section of the Plan	Policy HC 4 Infrastructure Provision, Developer Contributions & Viability
ID	LPS179
Response Date	24/02/2022 11:06:00
Name	Andy Scales
Organisation	Norfolk Constabulary
Agent Name	Andy Scales
Agent Organisation	NPS Property Consultants Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not consistent with national policy
Explanation	<p>SEE ATTACHED FILE</p> <p>Norfolk Constabulary welcomes the importance placed in section 5.4 to 'Infrastructure Provision, Developer Contributions'.</p> <p>The Local Plan recognises that future development within the District will place pressure and demand on existing infrastructure such as schools, open spaces, transport networks, health and community facilities. However, it fails to recognise the same pressure and demands in relation to police requirements. In mitigating additional demand there will be a requirement for new development, where necessary, to contribute toward the improvement of existing police infrastructure and facilities, to make development acceptable.</p> <p>At present, the Local Plan fails to address the requirements of Norfolk Constabulary especially as the police play a pivotal role in delivering the requirements of the NPPF, notably with regard to safe communities and paragraph 92 states</p> <p><i>Planning policies and decisions should aim to achieve healthy, inclusive and safe places which.....</i></p> <p>1 b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion</p> <p>The Local Plan in policy HC 1 place significant emphasis on health and well-being. The police play a key role in delivering safe communities, so that crime, disorder and anti-social behaviour (and the fear, worry and anxiety of such activities) does not undermine cohesion and harm the physical and mental health of existing and future residents. This should be explicitly recognised in the Local Plan to ensure that the plan is sound and consistent with NPPF provisions.</p> <p>Appendix 1 provides fuller justification for the police to be included within the policy (and supporting text) along with the level of contribution which it is considered appropriate to support police infrastructure requirements in planning obligations / s106 agreements.</p>
Modifications requested	<p>SEE ATTACHED FILE</p> <p>Therefore, to address the above, the Reg 19 version of the Local Plan in policy HC 4 (Infrastructure Provision, Developer Contributions & Viability) needs to be revised to ensure soundness and consistency with the NPPF by making specific reference to contributions towards police infrastructure requirements with the following amendment (highlighted in caps, below)</p> <p>1 In particular development will be expected to provide, or contribute towards the provision of:</p> <p>a) infrastructure requirements as identified in the site specific proposals;</p>

	<p>b) the highest viable level of affordable housing;</p> <p>c) the delivery of community infrastructure, including but not limited to education, healthcare, <u>POLICE</u>, libraries, community facilities, telecommunications;</p> <p>d) satisfactory</p> <p><u>In addition, Table 4 should include specific reference to Police and the supporting text should equally reference the need for police infrastructure to ensure that this is clear to developers.</u></p>
<p>Appear at examination hearing session(s)?</p> <p>* No, I do not wish to participate in examination hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	Norfolk Constabulary reserve the right to appear at the Hearing should modifications to be plan not be made in advance of its Examination to explain fully the justification for the changes requested to ensure soundness.
Attachment(s)	NNDC Reg 19 consultation response (Feb 2022).docx
Consultation Point Title	Infrastructure Provision, Developer Contributions & Viability
Consultation Point Number	Policy HC 4
Section of the Plan	Policy HC 4 Infrastructure Provision, Developer Contributions & Viability
ID	LPS207
Response Date	23/02/2022 23:18:50
Name	Mrs Gemma Harrison
Organisation	Cley Parish Council
Agent Name	
Agent Organisation	
<p>Do you consider the plan to be Legally Compliant?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Has the duty to cooperate been met?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Do you consider the plan to be Sound?</p> <p>* Yes</p> <p>* No</p>	No
<p>Reason(s) not Sound</p> <p>* It is not positively prepared</p> <p>* It is not effective</p> <p>* It is not justified</p> <p>* It is not consistent with national policy</p>	It is not effective
Explanation	The timing of infrastructure provision is essential. Cllrs raised concerns with Point 6 regarding viability. Proposals which don't have a viability assessment will be assumed to be fully policy compliant.
Modifications requested	Cllrs believe it would be a more robust policy to state that all developments require a viability assessment.
<p>Appear at examination hearing session(s)?</p> <p>* No, I do not wish to participate in examination hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Infrastructure Provision, Developer Contributions & Viability
Consultation Point Number	Policy HC 4
Section of the Plan	Policy HC 4 Infrastructure Provision, Developer Contributions & Viability
ID	LPS357
Response Date	04/03/2022 15:35:00

Name	
Organisation	Norfolk Homes Ltd
Agent Name	Mr Alan Presslee
Agent Organisation	Cornerstone Planning Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified; It is not consistent with national policy
Explanation	<p><u>Policy HC4</u>: We have concerns about the apparently open-ended form of expected developer contributions in paragraph 4 of the , especially given the footnote that “the following list is not exhaustive”. In the absence of a Regulation 123 List for the provision of infrastructure through CIL monies under the Community Infrastructure Levy Regulations 2010, we are concerned that there is insufficient clarity about the types, extents and expected contributions.</p> <p>References are made in the policy and supporting text to “healthcare” and “health provision”. It is noticeable that NHS England has – latterly – started to request financial contributions through planning applications, to address primary healthcare impacts arising from a proposed development. However, it is our view that financial contributions to doctor and dental surgeries (private businesses) is not a planning matter, and does not meet the tests under Regulation 122 of the Community Infrastructure Levy Regulations 2010. For doctor and dental practices, it is anticipated that the market will respond to the increased demands arising from proposed development.</p> <p>Consequently, broad policies that seek such (expressly or implicitly) should be avoided.</p> <p>As submitted, Policy HC4 is unsound as it neither justified, nor consistent with national policy.</p>
Modifications requested	As above
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	Explain/elaborate
Attachment(s)	
Consultation Point Title	Infrastructure Provision, Developer Contributions & Viability
Consultation Point Number	Policy HC 4
Section of the Plan	Policy HC 4 Infrastructure Provision, Developer Contributions & Viability
ID	LPS404
Response Date	07/03/2022 15:25:00
Name	Mr Will Wright
Organisation	ESCO Developments, Flagship Housing Group & Lovell Partnerships
Agent Name	Sarah Hornbrook
Agent Organisation	Bidwells LLP
Do you consider the plan to be Legally Compliant? * Yes	Yes

* No	
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<p>Infrastructure requirements associated with development proposals are often determined through local circumstances and through engagement with key stakeholders, such as the County Council's Planning Obligations Team. The non-exhaustive list at Part 4 of the policy, therefore, appears to predetermine the infrastructure requirements that may arise from development in the District. To ensure that development proposals provide proportionate and necessary infrastructure contributions, and that the policy is effective in accordance with Paragraph 35(c) of the NPPF, the policy should be revisited to omit this list.</p> <p>Part 7 of the policy requires development proposals that seek to depart from policy on viability grounds to be supported by a viability assessment at validation stage. This element of the policy should be revised to reflect the fact that amendments are often made to development proposals following statutory consultation. These amendments could impact upon viability assumptions, so restricting submission of a viability assessment to validation stage could prove premature and is unnecessarily onerous.</p>
Modifications requested	<p>The list in Part 4 of the Policy should be omitted.</p> <p>To better reflect the process of development management, the Consortium wish to suggest the following amendment to Part 7 of the policy. Proposed additional wording is shown in <i>italics</i>, and suggested omissions are shown struckthrough.</p> <p>Development proposals that seek to depart from policy on viability grounds must be supported by a viability assessment at validation stage that is suitable, proportionate, and transparent and accords with the required Council's methodology. Assessments should consider alternative funding mechanisms to aid scheme viability.</p> <p>Part 8 of the policy should also be deleted to reflect the proposed change to Part 7, as it is no longer required.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Infrastructure Provision, Developer Contributions & Viability
Consultation Point Number	Policy HC 4
Section of the Plan	Policy HC 4 Infrastructure Provision, Developer Contributions & Viability
ID	LPS433
Response Date	07/03/2022 14:44:39
Name	
Organisation	Hopkins Homes
Agent Name	Mr Jake Lambert
Agent Organisation	Bidwells
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes	Yes

* No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<p>This policy is unsound as it has not been justified and is considered <u>ineffective</u></p> <p>Infrastructure requirements associated with development proposals are often determined through local circumstances and through engagement with key stakeholders, such as the County Council's Planning Obligations Team. The non-exhaustive list at Part 4 of the policy, therefore, appears to predetermine the infrastructure requirements that may arise from development in the District. To ensure that development proposals provide proportionate and necessary infrastructure contributions, and that the policy is effective in accordance with Paragraph 35(c) of the NPPF, the policy should be revisited to omit this list.</p> <p>Part 7 of the policy requires development proposals that seek to depart from policy on viability grounds to be supported by a viability assessment at validation stage. This element of the policy should be revised to reflect the amendments that are often made to development proposals following statutory consultation. These amendments often impact upon viability assumptions, so requiring a viability assessment at validation stage would, in most cases, prove premature as the assessment would require continual refinement. Nevertheless, while Hopkins Homes may submit a viability assessment upon validation of an application, the policy should acknowledge that subsequent updates to the viability assessment may be required during determination of the application, as a consequence of scheme amendments.</p>
Modifications requested	<p>To better reflect the process of development management, Hopkins Homes wish to suggest the deletion of Part 4 of the policy, and the following amendment to Part 7 of the policy:</p> <p><i>Development proposals that seek to depart from policy on viability grounds must be supported by a viability assessment. at validation stage once responses from all statutory consultees have been received. The assessment must be that is suitable, proportionate, and transparent and accords with the required Council's methodology. Assessments should consider alternative funding mechanisms to aid scheme viability</i></p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Infrastructure Provision, Developer Contributions & Viability
Consultation Point Number	Policy HC 4
Section of the Plan	Policy HC 4 Infrastructure Provision, Developer Contributions & Viability
ID	LPS608
Response Date	02/03/2022 12:17:00
Name	Ms Kerry Harris
Organisation	Thornage Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes	

* No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	<p>As NNDC is aware its district has one of the highest existing populations of elderly persons within England, and, that much more vulnerable in health terms as highlighted during the Covid Pandemic. Its demography is significantly and demonstrably different from the other Norfolk authorities so needs to be treated differently.</p> <p>Given the reliance of Thornage residents upon Holt Medical Practice and its surgeries at Kelling and Melton Constable their continuing performance is of particular interest and concern. Therefore, particular regard needs to be paid to the outworkings and impacts of the two housing proposed for Holt: Land North of Valley Lane (H7) (approx. 27 dwellings) and Land at Heath Farm (H20) (approx.. 180 dwellings), and, the two Briston sites (BR1010 and BR102) on land to the east (approx. 25 dwellings) and west (approx. 40 dwellings) of Astley Primary School.</p> <p>While it is acknowledged that the ability of NNDC, through Section 106 planning obligations, to seek additional "social infrastructure" is limited to more physical surgery accommodation the Parish Council is concerned that the capital sum that can be requested from new residential development is not adversely reduced by development viability arguments.</p> <p>While the Draft Local Plan has a specific policy (HC4), which is to be welcomed, the wording of criterion HC4(6) is unclear and open to misinterpretation.</p>
Modifications requested	<p>Therefore, in the interests of effectiveness that needs to be corrected to reflect Para. 5.4.14:</p> <p>(6) Proposals that are accompanied by a viability assessment(3) will not be taken as fully policy compliant do not need to be accompanied by a viability assessment(3)</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Infrastructure Provision, Developer Contributions & Viability
Consultation Point Number	Policy HC 4
Section of the Plan	Policy HC 4 Infrastructure Provision, Developer Contributions & Viability
ID	LPS462
Response Date	07/03/2022 16:47:08
Name	
Organisation	Broadland Housing Association
Agent Name	Mr Jake Lambert
Agent Organisation	Bidwells
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No

Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified
Explanation	<p><u>This policy is unsound as it has not been justified and is considered ineffective</u></p> <p>Infrastructure requirements associated with development proposals are often determined through local circumstances and through engagement with key stakeholders, such as the County Council's Planning Obligations Team. The non-exhaustive list at Part 4 of the policy, therefore, appears to predetermine the infrastructure requirements that may arise from development in the District. To ensure that development proposals provide proportionate and necessary infrastructure contributions, and that the policy is effective in accordance with Paragraph 35(c) of the NPPF, the policy should be revisited to omit this list.</p> <p>Part 7 of the policy requires development proposals that seek to depart from policy on viability grounds to be supported by a viability assessment at validation stage. This element of the policy should be revised to reflect the amendments that are often made to development proposals following statutory consultation. These amendments often impact upon viability assumptions, so requiring a viability assessment at validation stage would, in most cases, prove premature as the assessment would require continual refinement. Nevertheless, while BHA may submit a viability assessment upon validation of an application, the policy should acknowledge that subsequent updates to the viability assessment may be required during determination of the application, as a consequence of scheme amendments.</p>
Modifications requested	<p>To better reflect the process of development management, BHA wish to suggest the following amendment to Part 7 of the policy:</p> <p><i>Development proposals that seek to depart from policy on viability grounds must be supported by a viability assessment. at validation stage once responses from all statutory consultees have been received. The assessment must be that is suitable, proportionate, and transparent and accords with the required Council's methodology. Assessments should consider alternative funding mechanisms to aid scheme viability</i></p> <p>Part 8 of the policy should also be deleted to reflect the proposed change to Part 7.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Infrastructure Provision, Developer Contributions & Viability
Consultation Point Number	Policy HC 4
Section of the Plan	Policy HC 4 Infrastructure Provision, Developer Contributions & Viability
ID	LPS766
Response Date	28/02/2022 16:35:00
Name	Mr Mark Behrendt
Organisation	Home Builders Federation
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes	No

* No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	<p>The plan is unsound as the cumulative impact of the polices on the viability of development has not been robustly tested.</p> <p>The Council recognises in policy HC4 that development which meet all the requirements set out in the local plan should be considered to be viable and do not need to be accompanied with a viability assessment. When considering viability, the Council also sets out in paragraph 5.4.15 that the Local Plan Viability Assessment sets the standard approach for such appraisal. However, we are concerned that the North Norfolk Interim Plan Wide Viability Assessment does not consider all the costs being placed on new development and as such does not form a robust assessment of the impact of the local plan on development viability.</p>
Modifications requested	<p>At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF for the following reasons:</p> <ul style="list-style-type: none"> • The viability assessment is not robust <p>Before submitting the plan for examination, the Council must include the following costs as part of its viability assessment.</p> <p>Biodiversity Net Gain</p> <p>The Council must include the cost of meeting the mandatory 10% biodiversity net gain (BNG) required by the Environment Act. The impact assessment of this legislation undertaken by Government considers the cost of delivering 10% net gain to be circa £18,000 per hectare in the East of England [SEE FOOTNOTE] based on their central assumption that 75% of the required net gain being delivered onsite and 25% being delivered off site. However, should a development find it necessary to deliver more of the net gains offsite the costs will be significantly higher costs are estimated to be in the region of £60,000 per hectare. Given that the cost of meeting the 10% requirement will not be known until the baseline for the site has been established it will be important that the Council considers both low and high costs relating to BNG within the viability assessment. It is also important that consideration is given as to the potential land take from delivering 10% BNG on site and whether this will reduce the developable area.</p> <p>Energy Efficiency Standards</p> <p>As the Council note in the supporting text policy CC3 the Government have stated they will introduce a revised part L of the Building Regulations which will see new homes produce 27% less CO2 than under the existing regulations. In addition, the Government have stated that in in 2025 they will introduce the Future Homes Standard that is expected to see new homes produce 75% less CO2 than under the current regulations. However, the Council have only evaluated the cost of delivering the equivalent of level 4 of the Code for Sustainable Homes – a 20% reduction in CO2 compared to current regulation. Given that there is the potential for a sizeable proportion of development in this plan to be delivered under the higher future homes standard we would suggest that the Council considers the impact of meeting both these proposed standards.</p> <p>Electric Vehicle Charging</p> <p>No allowance appears to have been made to take account of the local plan requirements for electric vehicle charging. the evidence supporting the Government's response to the consultation on EVCPs estimated an installation cost of between £615 to £1,115 per EVCP for off-street parking and between £975 and £2,947 per charge point for multi-occupancy surface parking. Whilst this in itself may not seem a significant amount it is important that the actual cost of delivering this policy is included in the viability assessment to ensure the cumulative impact of all costs does not impact the deliverability of the local plan. However, the HBF and its Members also have serious concerns about the capacity of the existing electrical network in the UK. The supply from the power grid is already constrained in many areas across the country. Major network reinforcement will be required across the power network to facilitate the introduction of EVCPs and the move from gas to electric heating as proposed under the Future Homes Standard.</p> <p>These costs can be substantial and can drastically affect the viability of developments. If developers are funding the potential future reinforcement of the National Grid network at significant cost, this will</p>

	<p>have a significant impact on their businesses and potentially jeopardise future housing delivery. The updated part S of the Building Regulations indicate that the extra costs to connect charging points to the grid should not exceed £3,600 per charging unit and we would therefore recommend that this should be considered within the viability assessment.</p> <p>Given that the viability assessment indicates that in the lower value zone 1 area viability is marginal or negative across all development typologies we are concerned that the cumulative costs placed on development by this local plan could lead to even those sites considered viable at present to being unviable with the cumulative costs being placed on them. It is therefore essential that the Council produces a robust viability assessment that considers the impact of all the costs faced by developers. Given the level of inflation currently being seen we would also recommend that the assessment includes sensitivity testing to consider the impact of potential higher cost of materials and labour.</p> <p>FOOTNOTE: Table 14 Biodiversity net gain and local nature recovery strategies Impact Assessment, Defra (2020)</p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	I can also confirm that I wish to participate in the relevant hearing sessions in order to full represent our concerns which reflect the views of discussions with our membership who account of 80% of the market housing built in England and Wales.
Attachment(s)	
Consultation Point Title	Infrastructure Provision, Developer Contributions & Viability
Consultation Point Number	Policy HC 4
Section of the Plan	Policy HC 4 Infrastructure Provision, Developer Contributions & Viability
ID	LPS759
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
<p>Do you consider the plan to be Legally Compliant? * Yes * No</p>	
<p>Has the duty to cooperate been met? * Yes * No</p>	
<p>Do you consider the plan to be Sound? * Yes * No</p>	
<p>Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy</p>	
Explanation	<p>Infrastructure</p> <p>1. All new building should require improvements to roads and services PRIOR to any works commencing.</p> <p>2. As recognised by NNDC, this should include alterations to roads connecting our main towns. Cromer is already deadlocked during peak hours. It has been recognised for many years that highways such as the B1439 are no longer suitable for the type and level of traffic they are exposed to. Junctions from minor roads on the A148 and A149 are not suitable for additional traffic, e.g. Holway Road, Sheringham onto the A148.</p>

	<p>3. Many of our roads, including main roads through villages, the A149 coast road, for instance, follow the path of 18th & 19th century paths and the width has not changed in that time, making them unsuitable for increased levels of traffic.</p> <p>4. Towns will need additional car parks and toilet facilities. Main towns and many villages already suffer an extreme lack of car parking and with an appalling public transport network cannot cope with the influx of visitors.</p> <p>5. Lack of pavements through many villages on busy routes is a danger to the public, e.g. the A149 in Weybourne.</p> <p>6. Lack of cycle routes: if cycling and walking are to be promoted, the roads have to be safe for both, and/or dedicated cycle routes need to be created linking villages and towns.</p> <p>7. Increased congestion on our roads will increase CO2 emissions.</p> <p>Public Transport</p> <p>1. A bus service that runs at most hourly, and in winter only two-hourly, and that starts after school/business hours and finishes before school/business closing times is wholly inadequate.</p> <p>2. There is an acute shortage of reliable and convenient public transport in rural areas, this promotes a dependency on the use cars.</p>
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Infrastructure Provision, Developer Contributions & Viability
Consultation Point Number	Policy HC 4
Section of the Plan	Policy HC 4 Infrastructure Provision, Developer Contributions & Viability
ID	LPS677
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	We welcome a policy detailing the necessary contributions of developments to GIRAMS and the need to deliver environmental infrastructure. Natural England also supports section 4 of the policy highlighting the need to mitigate increased recreational pressure on European sites as also detailed in the HRA.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	

Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Infrastructure Provision, Developer Contributions & Viability
Consultation Point Number	Policy HC 4
Section of the Plan	Policy HC4 Infrastructure Provisions, Developer Contributions & Viability
ID	LPS307
Response Date	03/03/2022 09:02:11
Name	
Organisation	White Lodge (Norwich) Ltd
Agent Name	Mr Sam Hazell
Agent Organisation	Lawson Planning Partnership Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	<p>SEE ATTACHED FILE</p> <p>The Plan is unsound when considered against the related tests set out in paragraph 35 of the NPPF (2021) as explained below.</p> <ul style="list-style-type: none"> • Not Positively prepared– the proposed Small Growth Village Strategy approach will not provide enough homes of the right type in the right places for a growing population to meet the area’s needs (including affordable) and could frustrate the delivery of sustainable housing development. • Not Justified– the strategy is not appropriate, taking into account the reasonable alternative to allocate suitable and available sites in Small Growth Villages, and is not based on proportionate evidence. • Not Effective– the plan does not provide landowners/ developers with sufficient planning certainty and will not therefore, deliver the required development, including affordable housing, in Small Growth Villages over the plan period. • Not Consistent with National Policy– The proposed Small Growth Village Strategy approach will not deliver sufficient homes, nor support community vitality & services viability, it will not therefore enable the delivery of sustainable development in rural areas. This approach would run counter to para 78 which states, “In rural areas, planning policies and decisions should be responsive to local circumstances and support housing development that reflect local needs”, and para 79, “To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.” <p>We OBJECT to Policy HC4 because the Interim Plan Wide Viability Assessment (2018) which is used to set the level of planning obligations sought to make development acceptable in planning terms, has not sufficiently assessed the viability of housing sites in Small Growth Villages, as set out in detail in the representations letter dated 1st March 2022, attached.</p> <p>Please also see separate representations which request changes to the approach and detailed wording of Policy SS1, Policies Map, Policy</p>

	HOU1, Policy HOU2, Policy E6, and Policy DS1, which provide further justification in support of our representations on the Plan which should be read as a whole.
Modifications requested	SEE ATTACHED FILE In order to make the Plan sound, a separate viability assessment which is proportionate and necessary should be undertaken to examine the policy interaction on small sites in Small Growth Villages, to ensure the Plan is justified and effective in meeting the identified housing need, including affordable need, on a District Level, as set out in detail in the representations letter dated 1st March 2022, attached.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	In accordance with our legal right to appear before and be heard by the inspector at the hearing. We wish to elaborate on our representations, which set out the changes we have requested to the strategy approach and the identified interrelated policies that are required to make the plan sound.
Attachment(s)	176_HighKelling_Reg19.Reps.Letter.FINAL_1.3.22.pdf (6) FINAL LPPRepslett WhiteLodge NNLP 18.06.19.pdf (6)

Policy HC 5 Fibre to the Premises (FTTP)

Consultation Point Title	Fibre to the Premises (FTTP)
Consultation Point Number	Policy HC 5
Section of the Plan	Policy HC 5 Fibre to the Premises (FTTP)
ID	LPS769
Response Date	28/02/2022 16:35:00
Name	Mr Mark Behrendt
Organisation	Home Builders Federation
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not consistent with national policy
Explanation	The policy is unsound as it is not consistent with national policy. As the Council are no doubt aware the Government are consulting on amendments to part R of the Building Regulations: Physical Infrastructure and network connections to new dwellings. These improved regulations will require all new build dwellings to be installed with the gigabit-ready physical infrastructure connections subject to a cost cap of £2,000 per dwelling. These requirements, if adopted as set out in the consultation, will mean that HC5 will broadly repeat the requirements of the building regulations and as such be inconsistent with paragraph 16 of the NPPF which requires Councils to avoid unnecessary duplication.
Modifications requested	Given the Government's clear intention with regard to such infrastructure we would suggest that this policy is not needed and should be deleted to avoid confusion as to the relevant standard to be applied. The viability assessment will also need to take account of the cost of meeting these requirements up to the cost cap being proposed in the consultation.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	I can also confirm that I wish to participate in the relevant hearing sessions in order to full represent our concerns which reflect the views of discussions with our membership who account of 80% of the market housing built in England and Wales.
Attachment(s)	

Policy HC 6 Telecommunications Infrastructure

Consultation Point Title	Telecommunications Infrastructure
Consultation Point Number	Policy HC 6
Section of the Plan	Policy HC 6 Telecommunications Infrastructure
ID	LPS87
Response Date	16/02/2022 14:23:44
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not consistent with national policy
Explanation	There should be provision here to control telecommunication infrastructure in the AONB, other protected habitats and landscapes where rurality and tranquillity is important, and in conservation areas.
Modifications requested	'Planning permission may be granted for new telecommunications infrastructure provided... d. it is not being sited in the AONB, a protected landscape or a conservation area, in which case the application should go through the standard application process.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Telecommunications Infrastructure
Consultation Point Number	Policy HC 6
Section of the Plan	Policy HC 6 Telecommunications Infrastructure
ID	LPS340
Response Date	04/03/2022 14:34:54
Name	Miss Natalie Beal
Organisation	Broads
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	

Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Comment Does not refer to the impact of telecommunications infrastructure on the setting of the Broads (and AONB?). This could be weaved into part b. Relevant part of NPPF The Broads and the setting of the Broads is protected at NPPF paragraph 176.
Modifications requested	Proposed change 'it has been demonstrated that the least visually intrusive option has been selected, including the use of innovative design and construction and/or sympathetic camouflaging and landscaping, which does not impact on the Broads or its setting; and'
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Telecommunications Infrastructure
Consultation Point Number	Policy HC 6
Section of the Plan	Policy HC 6 Telecommunications Infrastructure
ID	LPS678
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Natural England agrees that telecommunications infrastructure should avoid visual impacts to the Norfolk Coast AONB. In line with Policies ENV1 and ENV4, we recommend that an appropriate assessment and/or project level HRA is undertaken to assess potential impacts and ensure no likely significant effect to protected landscapes or designated sites.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	

Justification for appearing at hearing	
Attachment(s)	

5.7 Parking Provision

Consultation Point Title	Parking Provision
Consultation Point Number	5.7
Section of the Plan	5.7.1, 5.7.2
ID	LPS24
Response Date	23/01/2022 15:39:45
Name	Mr David Hurdle
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not consistent with national policy
Explanation	5.7.1. and 5.7.2 should stress the need to REDUCE car use, indeed MINIMISE it. Moving to alternative fuels is fine but traffic levels HAVE to be less.
Modifications requested	See question 5
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

Policy HC 7 Parking Provision

Consultation Point Title	Parking Provision
Consultation Point Number	Policy HC 7
Section of the Plan	Policy HC 7 Parking Provision
ID	LPS70
Response Date	16/02/2022 14:34:46
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	point 2- provision of parking should take account of public parking, public transport, sustainable p travel modes. I would be concerned about under providing parking as a result of an optimistic assessment of sustainable travel or alternative parking options. Public transport and sustainable modes of transport are thinly spread.
Modifications requested	2 Development proposals set NCC standard of parking provision as a minimum.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Parking Provision
Consultation Point Number	Policy HC 7
Section of the Plan	Policy HC 7 Parking Provision
ID	LPS643
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	

Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	This does not meet the "Effective" test of soundness. This only addresses parking provision at the developments – there appears to be no recognition of the impact of an increase of 10,000 new houses on parking in town centres and tourist areas – including small villages with narrow roads and existing parking issues – when the occupants of the houses go shopping or for a day out.
Modifications requested	The Plan needs to address the issue of increased parking pressures throughout the region.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Parking Provision
Consultation Point Number	Policy HC 7
Section of the Plan	Policy HC 7 Parking Provision
ID	LPS770
Response Date	28/02/2022 16:35:00
Name	Mr Mark Behrendt
Organisation	Home Builders Federation
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not consistent with national policy
Explanation	The policy is not sound as it not consistent with national policy. Part 2 of this policy must be rewritten as it is currently inconsistent with national policy. The policy cannot state that development proposals must accord with supplementary guidance as this can be changed without the need for the level of scrutiny required to amend a local plan policy. Whilst we recognise that the policy goes on to state that this is only a starting point, we would suggest that greater clarity is required to make the policy sound. We would suggest the following wording: "Development proposals make provision for vehicle and cycle parking having regard to the latest Norfolk County Council Parking Standards. When deciding on the level of parking provided consideration will also be given to local conditions, such as the availability of public parking, sustainable travel modes and design and conservation objectives."

Modifications requested	<p>At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF for the following reasons:</p> <ul style="list-style-type: none"> • Requirements for electric vehicle charging are inconsistent with national policy <p>As outlined in our comments on policy CC8 it is not necessary for the Council to refer to electric vehicle charging as these have now been set out in building regulations. Therefore, the reference to electric vehicle charging should be deleted from this policy.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	I can also confirm that I wish to participate in the relevant hearing sessions in order to full represent our concerns which reflect the views of discussions with our membership who account of 80% of the market housing built in England and Wales.
Attachment(s)	

Policy HC 8 Safeguarding Land for Sustainable Transport

Consultation Point Title	Safeguarding Land for Sustainable Transport
Consultation Point Number	Policy HC 8
Section of the Plan	Policy HC 8 Safeguarding Land for Sustainable Transport
ID	LPS192
Response Date	23/02/2022 15:44:00
Name	Greg Hewitt
Organisation	Wells Town Council
Agent Name	Andrea Long
Agent Organisation	Compasspoint Planning and Rural Consultants
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	<p>The first part of Policy HC8 (page 71) lists a number of former railway trackbeds and other railway land that will be protected from development. The list in the policy omits an important trackbed. An addition is requested as follows:</p> <p>"e) Walsingham to Wells-next-the-Sea"</p> <p>The second part of Policy HC8 refers to Areas designated as Land Safeguarded for Sustainable Transport which are currently in use as, or with potential for, rail freight facilities in the following settlements will also be protected from development:.....b) Fakenham c) Great Ryburgh....". An addition is requested as follows:</p> <p>1 e) Wells-next-the-Sea</p> <p>The reasons for the requested amendment are as follows:</p> <ol style="list-style-type: none"> 1 a) National government policy requires local authorities to identify and protect sites and routes [which are] critical in developing infrastructure...allowing road to rail transfer (5.8.3). 2 b) Tremendous growth in tourism in recent years has put great pressure on parking and roads in holiday resorts, with the railway playing a crucial role in Park and Ride services in coastal settlements like St Ives, Newquay, and Looe, in Cornwall, for example. 3 c) The 23 miles of track or track bed from Wymondham to Fakenham is already in use or protected. The Mid Norfolk Railway has a long term, published ambition to restore the railway to Fakenham. The track bed from Fakenham to Walsingham is already protected under criterion d) of Local Plan Policy HC8. The track bed from Walsingham to Wells-next-the-Sea is intact. To secure the benefits of a through rail park and ride service, the track bed into Wells needs to be protected too.
Modifications requested	<p>The list in the policy omits an important trackbed. An addition is requested as follows:</p> <p>"e) Walsingham to Wells-next-the-Sea"</p> <p>The second part of Policy HC8 refers to Areas designated as Land Safeguarded for Sustainable Transport which are currently in use as, or with potential for, rail freight facilities in the following settlements will also be protected from development:.....b) Fakenham c) Great Ryburgh....". An addition is requested as follows:</p> <p>1 e) Wells-next-the-Sea</p> <p>The reasons for the requested amendment are as follows:</p>

	<ol style="list-style-type: none"> 1 a) National government policy requires local authorities to identify and protect sites and routes [which are] critical in developing infrastructure...allowing road to rail transfer (5.8.3). 2 b) Tremendous growth in tourism in recent years has put great pressure on parking and roads in holiday resorts, with the railway playing a crucial role in Park and Ride services in coastal settlements like St Ives, Newquay, and Looe, in Cornwall, for example. 3 c) The 23 miles of track or track bed from Wymondham to Fakenham is already in use or protected. The Mid Norfolk Railway has a long term, published ambition to restore the railway to Fakenham. The track bed from Fakenham to Walsingham is already protected under criterion d) of Local Plan Policy HC8. The track bed from Walsingham to Wells-next-the-Sea is intact. To secure the benefits of a through rail park and ride service, the track bed into Wells needs to be protected too.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Safeguarding Land for Sustainable Transport
Consultation Point Number	Policy HC 8
Section of the Plan	Policy HC 8 Safeguarding Land for Sustainable Transport
ID	LPS679
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	We support the safeguarding of disused railway routes and the use of these routes as sustainable transport links and facilities. We also highlight the potential of these routes as footpaths, cycle ways and bridal ways as an option for improving GI, biodiversity networks and connectivity. We recommend direct communication with King's Lynn Borough Council where routes cross boundaries.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

6 Environment

Consultation Point Title	Environment
Consultation Point Number	6
Section of the Plan	CC13, ENV5 & ENV6 and paragraphs 3.13.7, 3.13.8 & 3.13.9
ID	LPS237
Response Date	24/02/2022 13:44:33
Name	Mr Michael Rayner
Organisation	CPRE Norfolk
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	SEE ATTACHED FILE CPRE Norfolk applauds NNDC for seriously addressing the issue of light pollution in these policies and supporting text. However, with the technical issues around light pollution being addressed through the North Norfolk Design Guide DPD which is still in draft form, it is not easy to see exactly how the intentions within these policies will be enacted. Therefore, we attach CPRE Norfolk's position statement on light pollution to assist NNDC in adding detail to these policies and supporting text, or outside of this Regulation 19 consultation process, to their emerging new Design Guide.
Modifications requested	SEE ATTACHED FILE
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	Light-Pollution-CPRE-Norfolk-Position-Statement.pdf
Consultation Point Title	Environment
Consultation Point Number	6
Section of the Plan	Policy ENV 2 Protection & Enhancement of Landscape & Settlement Character as well as Policy CC 10 Biodiversity Net Gain and Policy CC 11 Green Infrastructure
ID	LPS157
Response Date	22/02/2022 17:06:46
Name	Mr Michael Rayner
Organisation	CPRE Norfolk
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes

Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	SEE ATTACHED FILE
Modifications requested	SEE ATTACHED FILE
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	CPRE Norfolk - NNDC Reg 19 ConsultationBiodiversity FINAL.doc

6.1 Norfolk Coast Area of Outstanding Natural Beauty & The Broads

Consultation Point Title	Norfolk Coast Area of Outstanding Natural Beauty & The Broads
Consultation Point Number	6.1
Section of the Plan	6.1.4
ID	LPS644
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<p>6.1.4 Although the AONB is recognised as a sensitive landscape, development should not be prevented purely on the basis of its designation. Any development proposals within or affecting its setting will have to demonstrate clearly that they are appropriate to the landscape character type and designation. Sites that are suitable for housing outside Local Plan allocations should be developed specifically to meet local affordable and other locally identified housing needs. Proposed Submission Version (Regulation 19 Publication) Local Plan 87 Environment 6 This is not limited to only affordable housing provision but also to ensure wider local needs are met and a wide range of people are able to continue to work and live in the AONB. To do otherwise would fail to address these needs, which could then only be met by releasing more sensitive sites, causing harm and compromising the primary purpose of the AONB designation.</p> <p>This does not meet the “Effective” or “Justified” tests of soundness.</p> <p>The housing to be built in Weybourne, and in a number of other small and large growth villages is be to meet demand for retired people moving into the area, according to NNDC’s Planning Policy Manager. There will be no protection to ensure that properties do not become second homes. THIS DOESN’T MEET LOCAL NEED.</p>
Modifications requested	The Plan needs to specify that development within the AONB is to meet LOCAL NEED. There therefore needs to be a mechanism for ensuring that housing is suitable for and genuinely affordable to local families and young people, who will be those who support the growth in the number of elderly people within the District.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

Policy ENV 1 Norfolk Coast Area of Outstanding Natural Beauty & The Broads

Consultation Point Title	Norfolk Coast Area of Outstanding Natural Beauty & The Broads
Consultation Point Number	Policy ENV 1
Section of the Plan	Policy ENV 1 Norfolk Coast Area of Outstanding Natural Beauty & The Broads
ID	LPS88
Response Date	16/02/2022 14:59:58
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Point 2 ' development proposals should contribute positively and conserve and enhance these valued landscapes...' gives insufficient protection. The tranquillity and remoteness of the Norfolk Coast AONB is gradually being eroded by development which does not conserve, protect or enhance any of the qualities of this special landscape. This can be seen along the coast and at night with the recession of the dark skies.
Modifications requested	Point 2- Development proposals must contribute positively and conserve and enhance...'
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Norfolk Coast Area of Outstanding Natural Beauty & The Broads
Consultation Point Number	Policy ENV 1
Section of the Plan	Policy ENV 1 Norfolk Coast Area of Outstanding Natural Beauty & The Broads
ID	LPS131
Response Date	21/02/2022 15:26:28
Name	Mrs Gemma Harrison
Organisation	Holt Town Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met?	Yes

* Yes * No	
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Holt Town Council have asked for a change of wording to state that 'Development will not be allowed unless' rather than 'Development will be allowed if '
Modifications requested	'Development will not be allowed unless' rather than 'Development will be allowed if'
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Norfolk Coast Area of Outstanding Natural Beauty & The Broads
Consultation Point Number	Policy ENV 1
Section of the Plan	Policy ENV 1 Norfolk Coast Area of Outstanding Natural Beauty & The Broads
ID	LPS272
Response Date	28/02/2022 18:33:24
Name	Ms Gemma Clark
Organisation	Norfolk Coast Partnership
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	The Norfolk Coast Partnership is supportive of the stronger policy stance for the protection and enhancement of the Norfolk Coast AONB. Especially the acknowledgement of its special qualities and nocturnal character, which has been of greater concern in recent years. Also the reference to siting, scale massing and design is an important element of the policy when considering the impact of large replacement homes and new development on the special qualities of the AONB. We are also supportive of the acknowledgement of the AONB through policies EN2, E6 and E7 are supportive that new touring and camping sites will continue to not be permitted in the AONB. The Management Plan is under review therefore any references to it via website links will need to be checked (footnote 72). Once reviewed it will be easily located via the Norfolk Coast Partnership home page.
Modifications requested	
Appear at examination hearing session(s)?	

* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Norfolk Coast Area of Outstanding Natural Beauty & The Broads
Consultation Point Number	Policy ENV 1
Section of the Plan	Policy ENV 1 Norfolk Coast Area of Outstanding Natural Beauty & The Broads
ID	LPS341
Response Date	04/03/2022 14:46:03
Name	Miss Natalie Beal
Organisation	Broads Authority
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	
* Yes	
* No	
Has the duty to cooperate been met?	
* Yes	
* No	
Do you consider the plan to be Sound?	
* Yes	
* No	
Reason(s) not Sound	
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	<p>Comment</p> <p>Needs to refer to the dark skies of the AONB and the Broads. ENV1 para 4 part c refers to tranquillity, but given the darkness of the skies of the AONB and Broads that is referred to in the Local Plan, dark skies needs to be mentioned specifically. I see reference to 'nocturnal character', but I am not really sure what that term means; I don't see it explained anywhere – as mentioned, dark skies is talked about. If that is meant to refer to dark skies or addressing light pollution, then either say that or explain what nocturnal character means.</p> <p>Policy ENV 1b – should perhaps say 'built and geological features', as I take the term 'cultural heritage' to include historic structures</p> <p>Relevant part of NPPF</p> <p>Intrinsically dark skies is at para 185 C of the NPPF.</p>
Modifications requested	<p>Proposed change</p> <p>Either explain what nocturnal character is or be specific and talk about dark skies and light pollution.</p> <p>Policy ENV 1b – should perhaps say 'built and geological features', as I take the term 'cultural heritage' to include historic structures</p>
Appear at examination hearing session(s)?	No, I do not wish to participate in examination hearing session(s)
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Norfolk Coast Area of Outstanding Natural Beauty & The Broads
Consultation Point Number	Policy ENV 1
Section of the Plan	Policy ENV 1 Norfolk Coast Area of Outstanding Natural Beauty & The Broads
ID	LPS490

Response Date	07/03/2022 18:24:16
Name	
Organisation	Sutherland Homes
Agent Name	Mr Mark Singer
Agent Organisation	Barton Willmore
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	SEE ATTACHED FILE
Modifications requested	SEE ATTACHED FILE
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	Please see representations attached and sent via email
Attachment(s)	220307 Representations to NNDC Draft Local Plan Proposed Submission Version (C16).pdf (4)
Consultation Point Title	Norfolk Coast Area of Outstanding Natural Beauty & The Broads
Consultation Point Number	Policy ENV 1
Section of the Plan	Policy ENV 1 Norfolk Coast Area of Outstanding Natural Beauty & The Broads
ID	LPS680
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	We support a policy specific to the Norfolk Coast AONB and The Broads National Park. We agree that particular attention should be given to the objectives and principles set out in the Norfolk Coast

	<p>AONB Management Plan 2014-2019 and the Broads Plan 2017 and any successor documents.</p> <p>Natural England also agrees that development proposals should provide a Landscape and Visual Impact Assessment where potential adverse impacts area considered likely. Consideration should also be given to development proposals outside of the AONB and National Park boundaries to avoid further significant impacts on the protected landscape, as set out in paragraph 176 of the NPPF.</p>
Modifications requested	
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

6.2 Protection & Enhancement of Landscape & Settlement Character

Consultation Point Title	Protection & Enhancement of Landscape & Settlement Character
Consultation Point Number	6.2
Section of the Plan	Policy ENV 2 Protection & Enhancement of Landscape & Settlement Character as well as Policy CC 10 Biodiversity Net Gain and Policy CC 11 Green Infrastructure
ID	LPS156
Response Date	22/02/2022 17:25:45
Name	Mr Michael Rayner
Organisation	CPRE Norfolk
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	SEE ATTACHED FILE
Modifications requested	SEE ATTACHED FILE
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	NNNDReg19ConsultationBiodiversity.doc (1) CPRE Norfolk - NNDC Reg 19 ConsultationBiodiversity FINAL.doc

Policy ENV 2 Protection & Enhancement of Landscape & Settlement Character

Consultation Point Title	Protection & Enhancement of Landscape & Settlement Character
Consultation Point Number	Policy ENV 2
Section of the Plan	Policy ENV 2 Protection & Enhancement of Landscape & Settlement Character
ID	LPS60
Response Date	08/02/2022 20:38:00
Name	Ms Susan Grice
Organisation	Norfolk Gardens Trust
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>The Norfolk Gardens Trust (NGT) is a member organisation of the Gardens Trust (GT), a Statutory Consultee with regard to proposed development affecting sites listed by Historic England on the Register of Parks and Gardens. In partnership with the GT, NGT works to protect and conserve registered sites and other unlisted heritage parks and gardens which may or may not be included within local lists. In this capacity, the NGT wishes to express support for ENV2 - Protection & Enhancement of Landscape & Settlement Character. In particular, we welcome the requirement (para 3e) that development proposals should demonstrate that their location, scale, design and materials will protect, conserve and enhance the setting of and views into and from the AONB, the Broads, Conservation Areas and <i>Registered Parks & Gardens</i>.</p> <p>We also express support for paragraph 5 of the policy which requires a landscape visual impact assessment for those development proposals with wider visual impacts.</p>
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Protection & Enhancement of Landscape & Settlement Character
Consultation Point Number	Policy ENV 2
Section of the Plan	Policy ENV 2 Protection & Enhancement of Landscape & Settlement Character
ID	LPS89
Response Date	16/02/2022 15:03:28
Name	Dr Victoria Holliday
Organisation	

Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Points 1 and 3 - 'development should' gives insufficient protection and 'development must' would be preferable. Should is too subjective.
Modifications requested	See above
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Protection & Enhancement of Landscape & Settlement Character
Consultation Point Number	Policy ENV 2
Section of the Plan	Policy ENV 2 Protection & Enhancement of Landscape & Settlement Character
ID	LPS132
Response Date	21/02/2022 15:28:30
Name	Mrs Gemma Harrison
Organisation	Holt Town Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Holt Town Council support this policy and welcome the protection it brings. Cllrs have asked for a slight amendment of wording. Please see below.
Modifications requested	Holt Town Council asked for a change of wording for Point 3, development proposals ' must ' not 'should' protect, conserve and enhance the landscape.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s)	No, I do not wish to participate in examination hearing session(s)

* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Protection & Enhancement of Landscape & Settlement Character
Consultation Point Number	Policy ENV 2
Section of the Plan	Policy ENV 2 Protection & Enhancement of Landscape & Settlement Character
ID	LPS405
Response Date	07/03/2022 12:34:00
Name	Mr Will Wright
Organisation	ESCO Developments, Flagship Housing Group & Lovell Partnerships
Agent Name	Sarah Hornbrook
Agent Organisation	Bidwells LLP
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	Part 2 of the draft policy notes that consideration will be given to both the individual and cumulative impacts of a proposal. The policy as written does not define how cumulative impacts may be considered in decision-making. Moreover, given the case-by-case nature of landscape impacts, the policy requirement to cumulatively assess every development proposal in terms of landscape impacts is unlikely to apply in every case. This questions the effectiveness of this element of the draft policy, risking non-compliance with Paragraph 35(b) and (c) of the NPPF.
Modifications requested	Suggested revisions to the wording of part 2 of the policy are set out below. Proposed additional wording is shown in <i>italics</i> , and suggested omissions are shown struckthrough . <i>Outside of designated landscapes the Council will support development which is in scale and keeping with the defined landscape character and which is appropriate to its surroundings in terms of siting, design, materials, external appearance and landscaping. Consideration will be given to both the individual and cumulative impacts of a proposal.</i>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	I reserve the right to appear prior to publication of the draft agendas that will set out the Inspector's matters and questions to form the basis of the discussions at the Hearings. The intention to appear is to seek to ensure that the Policy can be made sound.
Attachment(s)	
Consultation Point Title	Protection & Enhancement of Landscape & Settlement Character
Consultation Point Number	Policy ENV 2
Section of the Plan	Policy ENV 2 Protection & Enhancement of Landscape & Settlement Character

ID	LPS438
Response Date	07/03/2022 14:57:00
Name	
Organisation	Hopkins Homes
Agent Name	Mr Jake Lambert
Agent Organisation	Bidwells
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<u>This policy is unsound as it has not been justified</u> Part 2 of the draft policy notes that consideration will be given to both the individual and cumulative impacts of a proposal. The policy as written does not define how cumulative impacts may be considered in decision-making. Moreover, given the case-by-case nature of landscape impacts, the policy requirement to cumulatively assess every development proposal in terms of landscape impacts is unlikely to apply in every case. This questions the effectiveness of this element of the draft policy, risking non-compliance with Paragraph 35(b) and (c) of the NPPF
Modifications requested	With this in mind, this element should be amended from the draft policy as follows: <i>Outside of designated landscapes the Council will support development which is in scale and keeping with the defined landscape character and which is appropriate to its surroundings in terms of siting, design, materials, external appearance and landscaping. Consideration will be given to both the individual and cumulative impacts of a proposal.</i>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Protection & Enhancement of Landscape & Settlement Character
Consultation Point Number	Policy ENV 2
Section of the Plan	Policy ENV 2 Protection & Enhancement of Landscape & Settlement Character
ID	LPS465
Response Date	07/03/2022 16:55:32
Name	
Organisation	Broadland Housing Association
Agent Name	Mr Jake Lambert
Agent Organisation	Bidwells
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met?	Yes

* Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<u>This policy is unsound as it has not been justified</u> Part 2 of the draft policy notes that consideration will be given to both the individual and cumulative impacts of a proposal. The policy as written does not define how cumulative impacts may be considered in decision-making. Moreover, given the case-by-case nature of landscape impacts, the policy requirement to cumulatively assess every development proposal in terms of landscape impacts is unlikely to apply to every case. This questions the effectiveness of this element of the draft policy, risking non-compliance with Paragraph 35(c) of the NPPF.
Modifications requested	BHA wishes to suggest the following minor amendment to part 2 of the policy as follows: <i>Outside of designated landscapes the Council will support development which is in scale and keeping with the defined landscape character and which is appropriate to its surroundings in terms of siting, design, materials, external appearance and landscaping. Consideration will be given to both the individual and cumulative impacts of a proposal</i>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Protection & Enhancement of Landscape & Settlement Character
Consultation Point Number	Policy ENV 2
Section of the Plan	Policy ENV 2 Protection & Enhancement of Landscape & Settlement Character
ID	LPS479
Response Date	07/03/2022 17:59:56
Name	
Organisation	Crisp Malting Group
Agent Name	Mr Jake Lambert
Agent Organisation	Bidwells
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	Part 2 of the draft policy notes that consideration will be given to both the individual and cumulative impacts of a proposal. The policy as written does not define how cumulative impacts may be considered in decision-making. Moreover, given the case-by-case nature of

	landscape impacts, the policy requirement to cumulatively assess every development proposal in terms of landscape impacts is unlikely to apply to every case. This questions the effectiveness of this element of the draft policy, risking non-compliance with Paragraph 35(c) of the NPPF.
Modifications requested	This element should be amended from the draft policy as follows: <i>Outside of designated landscapes the Council will support development which is in scale and keeping with the defined landscape character and which is appropriate to its surroundings in terms of siting, design, materials, external appearance and landscaping. Consideration will be given to both the individual and cumulative impacts of a proposal</i>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Protection & Enhancement of Landscape & Settlement Character
Consultation Point Number	Policy ENV 2
Section of the Plan	Policy ENV 2 Protection & Enhancement of Landscape & Settlement Character
ID	LPS725
Response Date	28/02/2022 08:14:00
Name	Mrs Debbie Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	We welcome the reference to Conservation Areas and Registered Parks and Gardens in this policy.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Protection & Enhancement of Landscape & Settlement Character
Consultation Point Number	Policy ENV 2
Section of the Plan	Policy ENV 2 Protection & Enhancement of Landscape & Settlement Character
ID	LPS681

Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	We welcome the commitment to enhance connectivity to surrounding green infrastructure and Public Rights of Way networks. We suggest that enhancement also facilitates wildlife through management of footpath edges/verges to increase biodiversity where possible.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Protection & Enhancement of Landscape & Settlement Character
Consultation Point Number	Policy ENV 2
Section of the Plan	Policy ENV 2 Protection & Enhancement of Landscape & Settlement Character & Figure 8
ID	LPS342
Response Date	04/03/2022 14:38:21
Name	Miss Natalie Beal
Organisation	Broads Authority
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Comment on ENV2 Paragraph 6.2.6 refers to dark skies which is supported, but there does not seem to be a mention in the policy itself – policy ENV2. I see

	<p>reference to 'nocturnal character', but I am not really sure what that term means; I don't see it explained anywhere – as mentioned, dark skies is talked about. If that is meant to refer to dark skies or addressing light pollution, then either say that or explain what nocturnal character means.</p> <p>Relevant part of NPPF Intrinsically dark skies is at para 185 C of the NPPF.</p> <p>Comment on Figure 8 Needs to reference the BA Landscape Character Assessment – perhaps as a footnote?</p> <p>Relevant part of NPPF The Broads and the setting of the Broads is protected at NPPF paragraph 176.</p>
Modifications requested	<p>Proposed change to ENV2 Either explain what nocturnal character is or be specific and talk about dark skies and light pollution.</p> <p>Proposed change to Figure 8 Add a footnote to the part of the key that says 'Broads Authority Executive Area' that says something like 'There is a Landscape Character Assessment for the Broads which can be found here: Landscape Character Assessment (broads-authority.gov.uk)'</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

Policy ENV 3 Heritage & Undeveloped Coast

Consultation Point Title	Heritage & Undeveloped Coast
Consultation Point Number	Policy ENV 3
Section of the Plan	Policy ENV 3 Heritage & Undeveloped Coast
ID	LPS90
Response Date	16/02/2022 15:04:20
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Heritage & Undeveloped Coast
Consultation Point Number	Policy ENV 3
Section of the Plan	Policy ENV 3 Heritage & Undeveloped Coast
ID	LPS682
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified	

* It is not consistent with national policy	
Explanation	We support the aim of Policy ENV3 in maintaining the open and natural character of the coast.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

6.4 Biodiversity & Geodiversity

Consultation Point Title	Biodiversity & Geodiversity
Consultation Point Number	6.4
Section of the Plan	6.4.4
ID	LPS226
Response Date	24/02/2022 11:18:00
Name	Ms Sarah Mitchell
Organisation	RSPB
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared
Explanation	Penultimate sentence - 'In the long term, as our climate begins to change...' The climate is already changing so this sentence needs to reflect this.
Modifications requested	Suggest amending penultimate sentence - 'In the long term, as our climate begins to change...' to 'In the long term, as our climate continues to change...'
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

Consultation Point Title	Biodiversity & Geodiversity
Consultation Point Number	Policy ENV 4
Section of the Plan	Policy ENV 4 Biodiversity & Geodiversity
ID	LPS91
Response Date	16/02/2022 15:15:02
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Point 1, that proposals where the main aim is to increase biodiversity will be supported in principle, couldn't this lead to targeted development proposals which are inappropriate apart from a seeming biodiversity gain? Does this policy apply to all development eg extensions, replacement or subdivision of buildings as well as new dwellings?
Modifications requested	Point 1, proposals where there is an incidental increase in biodiversity will be supported in principle Development in this policy means all development, including extensions, replacement and subdivisions of buildings'
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Biodiversity & Geodiversity
Consultation Point Number	Policy ENV 4
Section of the Plan	Policy ENV 4 Biodiversity & Geodiversity
ID	LPS224
Response Date	24/02/2022 11:12:00
Name	Ms Sarah Mitchell
Organisation	RSPB
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met?	Yes

* Yes	
* No	
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	RSPB supports this part of the Plan.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Biodiversity & Geodiversity
Consultation Point Number	Policy ENV 4
Section of the Plan	Policy ENV 4 Biodiversity & Geodiversity
ID	LPS406
Response Date	07/03/2022 12:32:00
Name	Mr Will Wright
Organisation	ESCO Developments, Flagship Housing Group & Lovell Partnerships
Agent Name	Sarah Hornbrook
Agent Organisation	Bidwells LLP
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Part 2b of this policy should be amended to reflect that some ecological and geological features require removal to facilitate development proposals, such as breaks in hedgerow to deliver a suitable access into a site. Without this caveat, the policy risks restricting the necessary enabling works required to serve the development site, thereby rendering the policy ineffective and in conflict with Paragraph 35(c) of the NPPF.
Modifications requested	The Consortium suggests the following minor amendment to part b of the policy as follows. Proposed additional wording is shown in <i>italics</i> , and suggested omissions are shown struckthrough. Retain and buffer ecological and geological features <i>wherever practical and feasible</i> and provide for the appropriate management of those features
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)

Justification for appearing at hearing	I reserve the right to appear prior to publication of the draft agendas that will set out the Inspector's matters and questions to form the basis of the discussions at the Hearings. The intention to appear is to seek to ensure that the Policy can be made sound.
Attachment(s)	
Consultation Point Title	Biodiversity & Geodiversity
Consultation Point Number	Policy ENV 4
Section of the Plan	Policy ENV 4 Biodiversity & Geodiversity
ID	LPS439
Response Date	07/03/2022 14:59:55
Name	
Organisation	Hopkins Homes
Agent Name	Mr Jake Lambert
Agent Organisation	Bidwells
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<u>This policy is unsound as it is considered ineffective</u> Part 2b of this policy should be amended to reflect that some ecological and geological features require removal to facilitate development proposals, such as breaks in hedgerow to deliver a suitable access into a site. Without this caveat, the policy risks restricting the necessary enabling works required to serve the development site, thereby rendering the policy ineffective and in conflict with Paragraph 35(c) of the NPPF.
Modifications requested	Hopkins Homes Ltd wishes to suggest the following minor amendment to part b of the policy as follows: <i>Retain and buffer ecological and geological features wherever practical and feasible and provide for the appropriate management of those features</i>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Biodiversity & Geodiversity
Consultation Point Number	Policy ENV 4
Section of the Plan	Policy ENV 4 Biodiversity & Geodiversity
ID	LPS645
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	

Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	<p>1. All development proposals will be expected to: a. provide a suitable ecological survey to establish the extent of potential impact where there are grounds to believe that ancient woodland, veteran trees, protected species(1) , priority species or priority habitat(2) may be affected during and after development.</p> <p>This does not meet the "Effective" test of soundness.</p> <p>This does not appear to protect meadows, ponds, recently planted wooded areas, heathland etc. These are all important for biodiversity and for carbon storage.</p>
Modifications requested	Meadows, ponds, recently planted wooded areas, heathland etc should receive similar protection.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Biodiversity & Geodiversity
Consultation Point Number	Policy ENV 4
Section of the Plan	Policy ENV 4 Biodiversity & Geodiversity
ID	LPS504
Response Date	07/03/2022 20:43:26
Name	Mr Mike Jones
Organisation	Norfolk Wildlife Trust
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	In order to ensure that the policy is effective, we recommend modifications to the wording to ensure that it is clear that impacts can occur offsite as well as onsite, and to ensure that the wording is clear about the mitigation hierarchy in all circumstances.

Modifications requested	<p>We recommend the following modifications to make this policy effective.</p> <p>Section 6.4.10 should also include reference to County Wildlife Sites.</p> <p>Section 2a should include 'either onsite or nearby' to raise awareness that indirect impacts can occur on adjacent land, with a resultant need for ecological assessment, even if there are relevant features known on site.</p> <p>Section 6 needs to include reference to the need for compensation for any impacts referred to here. The need to compensate for impacts, as set out in section 3 of the policy, still applies where relevant legally in section 6 and so we recommend reference to compensation is also included here for clarity.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Biodiversity & Geodiversity
Consultation Point Number	Policy ENV 4
Section of the Plan	Policy ENV 4 Biodiversity & Geodiversity
ID	LPS463
Response Date	07/03/2022 17:29:24
Name	
Organisation	Broadland Housing Association
Agent Name	Mr Jake Lambert
Agent Organisation	Bidwells
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	No
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<p><u>This policy is unsound as it is considered ineffective</u></p> <p>Part 2b of this policy should be amended to reflect that some ecological and geological features require removal to facilitate development proposals, such as breaks in hedgerow to deliver a suitable access into a site. Without this caveat, the policy risks restricting the necessary enabling works required to serve a development site, thereby rendering the policy ineffective and in conflict with Paragraph 35(c) of the NPPF.</p>
Modifications requested	<p>BHA wishes to suggest the following minor amendment to part b of the policy as follows:</p> <p><i>Retain and buffer ecological and geological features wherever practical and feasible and provide for the appropriate management of those features</i></p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

Consultation Point Title	Biodiversity & Geodiversity
Consultation Point Number	Policy ENV 4
Section of the Plan	Policy ENV 4 Biodiversity & Geodiversity
ID	LPS480
Response Date	07/03/2022 18:01:18
Name	
Organisation	Crisp Malting Group
Agent Name	Mr Jake Lambert
Agent Organisation	Bidwells
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<u>This policy is unsound as it is considered ineffective.</u> Part 2b of this policy should be amended to reflect that some ecological and geological features require removal to facilitate development proposals, such as breaks in hedgerow to deliver a suitable access into a site. Without this caveat, the policy risks restricting the necessary enabling works required to serve a development site, thereby rendering the policy ineffective and in conflict with Paragraph 35(c) of the NPPF.
Modifications requested	CMG wishes to suggest the following minor amendment to part b of the policy as follows: <i>Retain and buffer ecological and geological features where practical and feasible and provide for the appropriate management of those features</i>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Biodiversity & Geodiversity
Consultation Point Number	Policy ENV 4
Section of the Plan	Policy ENV 4 Biodiversity & Geodiversity
ID	LPS761
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes	

* No	
Do you consider the plan to be Sound?	
* Yes	
* No	
Reason(s) not Sound	
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	<p>Biodiversity/Environment</p> <p>1. An increase in the number of second/holiday/retirement properties will inevitably increase the pressure on important wildlife habitats, as visiting this kind of site is the reason many of these people will be in North Norfolk.</p> <p>2. All rules on biodiversity/climate change and adaptation etc must apply to extensions as well as new developments.</p> <p>3. The plan does not take into account the impact of house-owners replacing existing permeable surfaces with hard landscaping. This needs to be brought into the planning system, or there will be an increase in surface run-off from existing properties that will contribute to localised flooding, undoing any positives from the restrictions imposed in the Local Plan on new housing development. Mitigation measures need to be required at a minimum. There should be limits to the proportion of the site area that can be covered in non-permeable landscaping.</p> <p>4. The rules and restrictions relating to, e.g. sustainable drainage, must apply once developments have been built, preventing owners from making changes once the property has been occupied; this is the case currently, and frankly makes a mockery of the planning system.</p> <p>5. The roads are already insufficient for the current population/tourism industry. They will need development in order to cope with the influx of the predicted additional 11,000 people. This will require some incursion into countryside, with the consequential destruction of habitat and biodiversity.</p> <p>6. Measures will need to be taken to reduce congestion in Cromer. When the traffic is queuing in Church St the air quality must suffer, and this will get worse with the increase in traffic resulting from the housing development in Cromer as well as elsewhere. The air quality data on which the Plan is based is from the first half of 2020, when people were not allowed to travel much – from March 23rd until June 1st, the country was in lockdown. During this period, tourism was 56% down according to NNDC's own figures. The Plan is therefore based on a false premise.</p> <p>7. Property boundaries should be marked with hedges rather than walls and hard landscaping.</p> <p>8. Even if new housing is itself carbon neutral, the lack of public transport will mean that additional CO2 will be emitted by cars, especially as people will be living in the large towns such as North Walsham and travelling to e.g. Weybourne to do their caring jobs etc.</p>
Modifications requested	<p>All rules on biodiversity/climate change and adaptation etc must apply to extensions as well as new developments.</p> <p>The plan does not take into account the impact of house-owners replacing existing permeable surfaces with hard landscaping. This needs to be brought into the planning system, or there will be an increase in surface run-off from existing properties that will contribute to localised flooding, undoing any positives from the restrictions imposed in the Local Plan on new housing development. Mitigation measures need to be required at a minimum. There should be limits to the proportion of the site area that can be covered in non-permeable landscaping.</p> <p>Property boundaries should be marked with hedges rather than walls and hard landscaping.</p>
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Consultation Point Title	Biodiversity & Geodiversity
Consultation Point Number	Policy ENV 4
Section of the Plan	Policy ENV 4 Biodiversity & Geodiversity
ID	LPS683
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Natural England welcomes the commitment and protection afforded to designated sites. As mentioned in the policy, developmental growth in the area is likely to cause adverse effects to designated sites and should be appropriately assessed to identify impacts and mitigation. We also value the attention given to biodiversity net gain and the opportunities to enhance and create habitats to support wildlife. We encourage links to existing ecological networks to reduce fragmentation and facilitate wildlife movement on a strategic scale.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

6.5 Impacts on Internationally Designated Sites: Recreational Impact Avoidance & Mitigation Strategy

Consultation Point Title	Impacts on Internationally Designated Sites: Recreational Impact Avoidance & Mitigation Strategy
Consultation Point Number	6.5
Section of the Plan	6.5.2
ID	LPS646
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	<p>6.5.2 Within North Norfolk, such sites include the North Norfolk Coast SAC/SPA, the Wash and North Norfolk Coast SAC and European Marine Site, Overstrand Cliffs SAC, Winterton Horsey Dunes SAC, the Norfolk Valley Fens SAC, the River Wensum SAC (one of the best examples of a chalk river in the country) and the Broads and Broadland SAC and SPA.</p> <p>This does not meet the “Effective” test of soundness.</p> <p>NCC is planning to put a road and viaduct through the Wensum SAC area, including the destruction of veteran trees which will affect a maternity roost of rare and protected Barbastelle bats. This will fly in the face of NNDC’s policy.</p>
Modifications requested	The Plan must include protection from building and infrastructure development for designated sites.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

Policy ENV 5 Impacts on International & European sites: Recreational Impact Avoidance & Mitigation Strategy

Consultation Point Title	Impacts on International & European sites: Recreational Impact Avoidance & Mitigation Strategy
Consultation Point Number	Policy ENV 5
Section of the Plan	Policy ENV 5 Impacts on International & European sites: Recreational Impact Avoidance & Mitigation Strategy
ID	LPS92
Response Date	16/02/2022 15:29:40
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Point 1 - how will a planning application demonstrate no adverse effect on a European site? What impact assessment is being used? Why aren't International sites referred to in the body of the policy.
Modifications requested	Planning permission will be granted provided an independent assessment consistent with best practice demonstrates no adverse effect....
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Impacts on International & European sites: Recreational Impact Avoidance & Mitigation Strategy
Consultation Point Number	Policy ENV 5
Section of the Plan	Policy ENV 5 Impacts on International & European sites: Recreational Impact Avoidance & Mitigation Strategy
ID	LPS225
Response Date	24/02/2022 12:12:00
Name	Ms Sarah Mitchell
Organisation	RSPB
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes	Yes

* No	
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	RSPB supports this part of the Plan.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Impacts on International & European sites: Recreational Impact Avoidance & Mitigation Strategy
Consultation Point Number	Policy ENV 5
Section of the Plan	Policy ENV 5 Impacts on International & European sites: Recreational Impact Avoidance & Mitigation Strategy
ID	LPS236
Response Date	24/02/2022 12:14:00
Name	Ms Sarah Mitchell
Organisation	RSPB
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective
Explanation	<p>Whilst internationally important designated sites are included in the Local Plan, and assessed in the HRA, we would also like to draw attention to two species whose presence within the District, but outside of designated sites may mean they are overlooked in planning. These are:</p> <p>European turtle dove</p> <p>North Norfolk (and north-west Norfolk) holds one of the last strongholds of European turtle dove in the UK, with key territories falling inside of the AONB. The turtle dove is one of the most threatened bird species in the UK. Its population fell by 95% between 1995 and 2018. Their range is increasingly concentrated into an ever-shrinking patch of East Anglia and the south-east of England. Globally, turtle doves are classed as Threatened (vulnerable) due to severe population decline (IUCN Red List of Endangered Species). Operation Turtle Dove (www.operationturtledove.org) works in the Local Plan area to save this species from UK extinction, but as the turtle dove is not a designated feature of the designated conservation sites in the area, and often, but not exclusively, found in farmland, its presence and sensitivity is often overlooked in planning. We would be happy to discuss the work of Operation Turtle Dove with the Council, including</p>

	<p>our work to provide land management advice for turtle dove, how habitat destruction can be avoided, and how the habitat requirements of this species can be better incorporated into the planning system, including through Biodiversity Net Gain.</p> <p>Stone-curlew</p> <p>Stone-curlews are listed on Annex I of the Birds Directive, as a species requiring special conservation measures concerning their habitat to ensure their survival and reproduction in their area of distribution. The species is also listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended), giving it special protection at all times: the Act makes it an offence to intentionally or recklessly disturb any bird so listed whilst it is nest building or at (or near) a nest with eggs or young, or to disturb the dependant young of such a bird. Reckless damage, destruction or obstruction to a place used by species listed in Schedule 1 are also offences.</p> <p>Stone-curlews are highly sensitive to built development [1],[2], with harmful effects found at distances of up to 2000m, and highly sensitive to human disturbance at distances of up to 500m[3].</p> <p>Please also see our comments on Policy E7. The RSPB has a stone-curlew expert based in Norfolk (The Brecks) who would be happy to assist the Council regarding stone-curlew conservation.</p> <p>[1] Sharp, J.; Clark, R.T.; Liley, D.; Green, R.E., 2008. The Effect of Housing Development and Roads on the Distribution of Stone curlews in the Brecks.</p> <p>[2] Clark, R.; Liley, D., 2013. Further Assessment of the Relationship Between Buildingss and Stone curlew Distribution.</p> <p>3 Taylor, E.C., Green, R.E. & Perrins, J. (2007) Stone-curlews <i>Burhinus oedicephalus</i> and recreational disturbance: developing a management tool for access. <i>Ibis</i> 149, 37-44</p> <p>[3]</p>
Modifications requested	We would like the council to consider these species in planning applications. The RSPB has data for both species and experts involved in their conservation who would be happy to advise. Stone-curlew should be referenced in policy E7 (see separate comment). The Plan could include Turtle Dove under 6.4 as a species not always protected by its presence at designated sites, but as one which should be considered as part of the suite of species possibly impacted by development during planning application reviews.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Impacts on International & European sites: Recreational Impact Avoidance & Mitigation Strategy
Consultation Point Number	Policy ENV 5
Section of the Plan	Policy ENV 5 Impacts on International & European sites: Recreational Impact Avoidance & Mitigation Strategy
ID	LPS647
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	

Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	<i>Policy ENV 5 - Impacts on International & European sites: Recreational Impact Avoidance & Mitigation Strategy</i> <i>Planning permission will be granted subject to demonstrating no adverse effect on the integrity of European sites from recreational disturbance when considered alone or in-combination.</i> This does not meet the "Effective" test of soundness. We do not believe it is possible to demonstrate no adverse effect before a development is built.
Modifications requested	The Plan needs to clarify how "no adverse impact" can be demonstrated. There should also be a way of confirming that no adverse impact has actually taken place once the development is completed, and of imposing the requirement to take remedial action if harm is demonstrated.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Impacts on International & European sites: Recreational Impact Avoidance & Mitigation Strategy
Consultation Point Number	Policy ENV 5
Section of the Plan	Policy ENV 5 Impacts on International & European sites: Recreational Impact Avoidance & Mitigation Strategy
ID	LPS684
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Natural England welcomes the commitment to a strategic approach to mitigate recreational visitor impacts to European sites. Developmental growth in the area is likely to cause adverse effects to designated sites and should be appropriately assessed to identify recreational disturbance impacts and mitigation. We strongly advise the Local Planning Authority instigates a suitably proportionate interim payment per dwelling in the absence of an established strategy to ensure new residential development and any associated recreational disturbance impacts on European designated

	sites are compliant with the Habitats Regulations, to address cumulative and in-combination impacts arising.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

6.6 Protection of Amenity

Consultation Point Title	Protection of Amenity
Consultation Point Number	6.6
Section of the Plan	6.6.8
ID	LPS648
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	<i>6.6.8 To date, two locations in North Norfolk (Wiveton Downs and Kelling Heath Holiday Park) have been awarded Dark Sky Discovery Site status and special attention should be given to these areas and the wider AONB. Lighting in new development should be limited to that necessary for security and consideration should also be given to ways of minimising light pollution from exterior lighting, large glazed areas, sky lights etc.</i> This does not meet the "Effective" test of soundness. Weybourne is in sight of Kelling Heath Holiday Park, so development is likely to reduce the darkness of the skies at this site.
Modifications requested	There should be restriction on development, not just on the lighting; there should only be a requirement for houses for local need. Development in Weybourne therefore needs to be minimised to match LOCAL NEEDS AND NO MORE.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Protection of Amenity
Consultation Point Number	6.6
Section of the Plan	6.6.7 - 6.6.8
ID	LPS343
Response Date	04/03/2022 14:39:27
Name	Miss Natalie Beal
Organisation	Broads Authority
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	

Policy ENV 6 Protection of Amenity

Consultation Point Title	Protection of Amenity
Consultation Point Number	Policy ENV 6
Section of the Plan	Policy ENV 6 Protection of Amenity
ID	LPS93
Response Date	16/02/2022 15:39:05
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	It's very pleasing to see dark skies mentioned and disturbance by light pollution taken into account. However this seems to apply to developments themselves not to the wider settlement or landscape.
Modifications requested	Could point d cover the impact of light pollution on the wider landscape (especially the AONB) and settlement?
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

* Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Comment The Broads have intrinsically dark skies too, so please mention the Broads. Relevant part of NPPF The Broads and the setting of the Broads is protected at NPPF paragraph 176 and it also has dark skies, as per para 185 c.
Modifications requested	Proposed change The Norfolk Coast Area of Outstanding Natural Beauty Partnership states as part of its 20 year vision that "the area will still be essentially unspoilt with a strong feeling of remoteness, peace and tranquillity, with wide skylscapes, seascaapes and dark night skies that show the richness and detail of constellations." (53) The Broads Authority also has intrinsically dark skies that are protected through its Local Plan
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

6.7 Protecting & Enhancing the Historic Environment

Consultation Point Title	Protecting & Enhancing the Historic Environment
Consultation Point Number	6.7
Section of the Plan	6.7.2
ID	LPS726
Response Date	28/02/2022 08:14:00
Name	Mrs Debbie Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Historic Parks and Gardens should read Registered Parks and Gardens.
Modifications requested	Change Historic Parks and Gardens to Registered Parks and Gardens.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Policy ENV 7 Protecting & Enhancing the Historic Environment

Consultation Point Title	Protecting & Enhancing the Historic Environment
Consultation Point Number	Policy ENV 7
Section of the Plan	Policy ENV 7 Protecting & Enhancing the Historic Environment
ID	LPS62
Response Date	08/02/2022 20:45:24
Name	Ms Susan Grice
Organisation	Norfolk Gardens Trust
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>The Norfolk Gardens Trust (NGT) is a member organisation of the Gardens Trust (GT), a statutory consultee with regard to proposed development affecting a site listed by Historic England's Register of Parks and Gardens (RPGs). The NGT and GT work in partnership to protect and conserve RPGs and also those parks and gardens which are not listed but which are significant heritage assets.</p> <p>In this context, we wish to express our strong support for ENV 7 Protecting & Enhancing the Historic Environment.</p> <p>With regard to para. 6.7.2 we would note that, as well as the 250 buildings on the Council's Local List, non-designated parks and gardens should be included. In this regard, we welcome the statement in 6.7.3 that the number of non-designated heritage assets on the list is likely to increase over time as new buildings and other assets are identified.</p> <p>In particular, we welcome the statement that the effect of an application on the significance of a non-designated heritage asset is a material consideration when deciding planning applications, and that the requirements of the policy apply to any local heritage assets identified in Neighbourhood Plans. These are important protections for designed landscapes which lack the statutory protection of being listed as Registered Parks & Gardens.</p>
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Protecting & Enhancing the Historic Environment
Consultation Point Number	Policy ENV 7
Section of the Plan	Policy ENV 7 Protecting & Enhancing the Historic Environment
ID	LPS94
Response Date	18/02/2022 12:02:56
Name	Dr Victoria

	Holliday
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Point 9, what methodology will be used to identify archeological assets and who will do teh archeological evaluation?
Modifications requested	Point 9, archeological assets should be identified using an evidence based methodology and a professional archaeologist should perform the archeological evaluation.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Protecting & Enhancing the Historic Environment
Consultation Point Number	Policy ENV 7
Section of the Plan	Policy ENV 7 Protecting & Enhancing the Historic Environment
ID	LPS133
Response Date	21/02/2022 15:31:11
Name	Mrs Gemma Harrison
Organisation	Holt Town Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Holt Town Council support this policy, they understand the importance of protecting the historic environment,. Cllrs have requested more robust wording. Please see below.
Modifications requested	Holt Town Cllrs asked that a change of wording is used at Point 9, 'development proposals must identify assets of archaeological significance' not should.

Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Protecting & Enhancing the Historic Environment
Consultation Point Number	Policy ENV 7
Section of the Plan	Policy ENV 7 Protecting & Enhancing the Historic Environment
ID	LPS208
Response Date	23/02/2022 23:22:05
Name	Mrs Gemma Harrison
Organisation	Cley Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Cllrs support this policy but have suggested an amendment.
Modifications requested	Development proposals must identify assets of archaeological significance (not should).
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Protecting & Enhancing the Historic Environment
Consultation Point Number	Policy ENV 7
Section of the Plan	Policy ENV 7 Protecting & Enhancing the Historic Environment
ID	LPS607
Response Date	02/03/2022 12:17:00
Name	Ms Kerry Harris
Organisation	Thornage Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes	

* No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	As noted in the Parish Council's Consultation Response to the Thornage Conservation Area Appraisal & Management Plan, the policy underpinning is to be found in Policy ENV7(8) which contains a typographical error; for given the consistent way in which Purcell have described these reports, and, as also described and recorded in para. 6.7.8 of the text the word "Character" needs to be deleted.
Modifications requested	Accordingly, the text needs to be corrected to read: 8. Development proposals will conserve and where opportunities arise, enhance the character and appearance of Conservation Areas , where account will be taken of any relevant Conservation Area Character Appraisal and Management Plans in determining proposals.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Protecting & Enhancing the Historic Environment
Consultation Point Number	Policy ENV 7
Section of the Plan	Policy ENV 7 Protecting & Enhancing the Historic Environment
ID	LPS727
Response Date	28/02/2022 08:14:00
Name	Mrs Debbie Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	This policy is much improved. We welcome the reference to heritage at risk. We also welcome the differentiation between exceptional and wholly exceptional scenarios. However, there are some remaining issues with the policy. In relation to non-designated heritage assets, reference should be made to the need for a balanced judgement. It would be helpful to include the Local List and Local List criteria as an appendix to the Plan. We note that some subheadings have been added. The Historic Environment Topic Paper helpfully charts the evolution of the policy. At one stage there were more subheadings in the policy. This made

	more sense. Whereas now, for example Conservation Areas are listed under non designated heritage assets (when they are designated heritage assets). Therefore, we suggest that you consider reinstating the second version of the policy as drafted on page 18 of the Topic Paper.
Modifications requested	Replace with the draft version of the policy of page 17 of the Topic Paper. Refer to balanced judgement for non-designated heritage assets. Add Local List Criteria and Local List as an Appendix to the Plan.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

6.8 High Quality Design

Consultation Point Title	High Quality Design
Consultation Point Number	6.8
Section of the Plan	6.8.17
ID	LPS135
Response Date	21/02/2022 15:36:44
Name	Mrs Gemma Harrison
Organisation	Holt Town Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Holt Town Council fully support this policy as they understand the importance of high-quality safe and vibrant spaces in towns and how this can have a positive influence on mental health and encourage residents into town to socialise and to shop. These vibrant areas of public realm boost local economies by making towns more attractive to visit and encourages visitors and residents to spend more time in town.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

Consultation Point Title	High Quality Design
Consultation Point Number	Policy ENV 8
Section of the Plan	Policy ENV 8 High Quality Design
ID	LPS103
Response Date	18/02/2022 12:20:49
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Point 1 is rather vague 'proposals will seek to achieve ...that reflects...that respects' and does not include design in terms of respecting the local character. I would include lighting in this policy.
Modifications requested	Point 1 ' all,proposals will enhance teh characteristics of the site and conform to the distinctive local character in terms of design, layout... add point k, proposals will conform to national guidelines on controlling light pollution.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	High Quality Design
Consultation Point Number	Policy ENV 8
Section of the Plan	Policy ENV 8 High Quality Design
ID	LPS616
Response Date	07/03/2022 11:30:00
Name	
Organisation	National Grid
Agent Name	Mr Chris Johnson
Agent Organisation	Avison Young Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound?	No

* Yes	
* No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not consistent with national policy
Explanation	The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Grid infrastructure. National Grid advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines, underground gas transmission pipelines, and other National Grid assets.
Modifications requested	Therefore, to ensure that Design Policy ENV 8 is consistent with national policy we would request the inclusion of a policy strand such as: "x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites."
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	High Quality Design
Consultation Point Number	Policy ENV 8
Section of the Plan	Policy ENV 8 High Quality Design
ID	LPS442
Response Date	07/03/2022 15:20:17
Name	
Organisation	Hopkins Homes
Agent Name	Mr Jake Lambert
Agent Organisation	Bidwells
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<u>This policy is unsound as it is considered ineffective</u> Part 3b of this policy should be amended as follows to recognise instances when removal, or partial remove, of natural features is necessary to facilitate development proposals. Without this caveat, the policy risks restricting the necessary facilitatory works required to serve the development site, thereby rendering the policy ineffective and in conflict with Paragraph 35(c) of the NPPF.
Modifications requested	Part 3b of the policy should be amended accordingly:

	<i>Retains existing important landscaping and natural features wherever feasible and practical, and includes landscape enhancement schemes that are compatible with the Landscape Character Assessment and the creation, restoration or enhancement of ecological networks</i>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	High Quality Design
Consultation Point Number	Policy ENV 8
Section of the Plan	Policy ENV 8 High Quality Design
ID	LPS609
Response Date	02/03/2022 12:17:00
Name	Ms Kerry Harris
Organisation	Thornage Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>We also note that policy ENV8 promotes high quality design, which is to be welcome. Criterion ENV8(2) requires all development proposals to be in conformity with the North Norfolk Design Guide SPD, or provide justification for departure “and be informed by the Planning in Health Protocol”. However, there is an absence of any footnote providing a link or other cross-reference to its intended meaning. A word search for “Protocol” did locate the term in the Glossary and to be:</p> <p>“An engagement tool between Local planning authorities, the Norfolk and Protocol Waveney Sustainability and Transformation Partnership, Clinical Commissioning Groups, Health Partners and Public Health Norfolk and Public Health Suffolk. Available in the Document Library and from the Norfolk Strategic Framework.”</p> <p>Further, a search of the “Document Library” did not reveal a direct link, which, as an important document, requires rectification. A cross-reference to DDLP paras. 5.1.2 & 5.1.3, where its purpose is explained, would underline its particular relevance and usefulness. The 2019 Protocol can actually be found in the Document Library under “Evidence Base – Infrastructure and Viability”. The Framework link does provide direct and easier access to the Protocol including, as Appendix 1, “A healthy planning checklist” and as Appendix 2 “Key NHS and Public health contact details for Planning Applications”. (i.e. generic contact email addresses).</p>
Modifications requested	There is an absence of any footnote providing a link or other cross-reference to its intended meaning. Further, a search of the “Document Library” did not reveal a direct link, which, as an important document, requires rectification
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s)	

* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	High Quality Design
Consultation Point Number	Policy ENV 8
Section of the Plan	Policy ENV 8 High Quality Design
ID	LPS466
Response Date	07/03/2022 16:57:49
Name	
Organisation	Broadland Housing Association
Agent Name	Mr Jake Lambert
Agent Organisation	Bidwells
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<u>This policy is unsound as it is considered ineffective</u> Part 3b of this policy should be amended as follows to recognise instances when removal, or partial removal, of natural features is necessary to facilitate development proposals. Without this caveat, the policy risks restricting the necessary facilitatory works required to serve the development site, thereby rendering the policy ineffective and in conflict with Paragraph 35(c) of the NPPF
Modifications requested	BHA wish to suggest the following amendment to ensure compliance with Paragraph 35(c) of the NPPF: <i>Retains existing important landscaping and natural features wherever practical and feasible, and includes landscape enhancement schemes that are compatible with the Landscape Character Assessment and the creation, restoration or enhancement of ecological networks</i>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	High Quality Design
Consultation Point Number	Policy ENV 8
Section of the Plan	Policy ENV 8 High Quality Design
ID	LPS481
Response Date	07/03/2022 18:03:02
Name	
Organisation	Crisp Malting Group
Agent Name	Mr Jake Lambert
Agent Organisation	Bidwells

Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	Part 3b of this policy should be amended as follows to recognise instances when removal, or partial removal, of natural features is necessary to facilitate development proposals. Without this caveat, the policy risks restricting the necessary facilitatory works required to serve the development site, thereby rendering the policy ineffective and in conflict with Paragraph 35(c) of the NPPF.
Modifications requested	CMG wish to suggest the following amendmnet to part 3b of the policy: <i>Retains existing important landscaping and natural features where practical and feasible, and includes landscape enhancement schemes that are compatible with the Landscape Character Assessment and the creation, restoration or enhancement of ecological networks</i>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	High Quality Design
Consultation Point Number	Policy ENV 8
Section of the Plan	Policy ENV 8 High Quality Design
ID	LPS408
Response Date	07/03/2022 15:28:00
Name	Mr Will Wright
Organisation	ESCO Developments, Flagship Housing Group & Lovell Partnerships
Agent Name	Sarah Hornbrook
Agent Organisation	Bidwells LLP
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Part 3b of this policy should be amended to recognise instances when removal, or partial removal, of natural features is necessary to facilitate development proposals. Without this caveat, the policy risks restricting the necessary facilitating works required to serve the development site, thereby rendering the policy ineffective and in conflict with Paragraph 35(c) of the NPPF.

Modifications requested	Suggested revisions to the wording are set out below. Proposed additional wording is shown in <i>italics</i> , and suggested omissions are shown struckthrough . Retains existing important landscaping and natural features <i>wherever practical and feasible</i> and includes landscape enhancement schemes that are compatible with the Landscape Character Assessment and the creation, restoration or enhancement of ecological networks
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	I reserve the right to appear prior to publication of the draft agendas that will set out the Inspector's matters and questions to form the basis of the discussions at the Hearings. The intention to appear is to seek to ensure that the Policy can be made sound.
Attachment(s)	
Consultation Point Title	High Quality Design
Consultation Point Number	Policy ENV 8
Section of the Plan	Policy ENV 8 High Quality Design
ID	LPS729
Response Date	28/02/2022 08:14:00
Name	Mrs Debbie Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	We welcome the policy and references to local character and the historic environment. We also welcome the references to the North Norfolk Design Guide and Landscape Character Assessment.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	High Quality Design
Consultation Point Number	Policy ENV 8
Section of the Plan	Policy ENV 8 High Quality Design
ID	LPS771
Response Date	28/02/2022 16:35:00
Name	Mr Mark Behrendt

Organisation	Home Builders Federation
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not consistent with national policy
Explanation	Policy is unsound as it not consistent with national policy. Part 2 of the policy requires all development to be in conformity with the North Norfolk Design Guide SPD. As set out in our comments on HC7 the Council cannot require development to be in conformity with supplementary guidance.
Modifications requested	At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF for the following reasons: • Requirements to conform to supplementary guidance are not consistent with legal requirements of local plans We would therefore recommend that the policy be amended to state that development should have regard to the SPD.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	I can also confirm that I wish to participate in the relevant hearing sessions in order to full represent our concerns which reflect the views of discussions with our membership who account of 80% of the market housing built in England and Wales.
Attachment(s)	
Consultation Point Title	High Quality Design
Consultation Point Number	Policy ENV 8
Section of the Plan	Policy ENV 8 High Quality Design
ID	LPS685
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective	

* It is not justified * It is not consistent with national policy	
Explanation	We welcome a policy that provides specific design requirements for development proposals, paying particular attention to creating a green infrastructure network and maximising opportunities for the provision of SuDS.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

7 Housing

Consultation Point Title	Housing
Consultation Point Number	7
Section of the Plan	7.1 Delivering Sufficient Homes
ID	LPS154
Response Date	22/02/2022 17:07:00
Name	Mr Michael Rayner
Organisation	CPRE Norfolk
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	CPRE Norfolk supports the draft plan in its approach to setting its housing requirement based on the 2016 Office for National Statistics (ONS) projections, as set out mainly at 7.1.4. and its inclusion of expected windfalls as explained at 7.1.7, although the inclusion of the latter at approximately 50% of the historic rates is considered to be too low. A higher percentage inclusion of windfalls would allow for a lower number of new allocated housing, with the subsequent beneficial effect of more new housing being located in more sustainable locations, due to the siting of windfalls being more likely to be as small-scale infills, redevelopments, re-use of existing buildings and affordable dwellings in the designated Countryside Policy Area.
Modifications requested	Policy HOU 1 should include a higher % of windfalls than the current windfall allowance of around 50% of the historic rate.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Housing
Consultation Point Number	7
Section of the Plan	HOU1 & HOU2 and plan period and 5year HLS
ID	LPS324
Response Date	03/03/2022 19:00:00
Name	
Organisation	Kelling Estate LLP
Agent Name	Roger Welchman
Agent Organisation	Armstrong Rigg Planning
Do you consider the plan to be Legally Compliant? * Yes * No	

Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	SEE ATTACHED FILE
Modifications requested	SEE ATTACHED FILE
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	1. Plan Period - Representation to Regulation 19 Version of North Norfolk Local Plan.pdf 6. Policy HOU1 housing requirement, supply and 5yr HLS - Representation to Regulation 19 Version of North Norfolk Local Plan.pdf 7. Policy HOU2 - Representation to Regulation 19 Version of North Norfolk Local Plan.pdf
Consultation Point Title	Housing
Consultation Point Number	7
Section of the Plan	7 Housing
ID	LPS67
Response Date	09/02/2022 12:40:03
Name	Tracey Bayfield
Organisation	Blakeney Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	<p>- the plan is deficient in not including reference to second homes. In Blakeney, nearly half the homes are second or holiday homes. This is inflating prices and putting housing out of reach of local people. It creates a non-sustainable village, in danger of being comprised of "incomers" with local people driven out. Whilst we understand the difficulty of controlling second home ownership, this could, as a first step, be applied to new builds;</p> <p>- on a similar point, we would wish to see more emphasis on affordable housing, so that whole estates could be made affordable without developers having the opportunity to include market housing and the affordable housing being reserved for local people, born in the village or having spent a significant part of their life here:</p> <p>- Blakeney is experiencing considerable development with one house being demolished and a large number of new homes being built on</p>

	the site. We would wish to see controls on that, so that one house could not be replaced by multiple dwellings.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Housing
Consultation Point Number	7
Section of the Plan	7 Housing
ID	LPS72
Response Date	13/02/2022 13:23:29
Name	Dawn Moore
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	No
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared
Explanation	<p>SEE ATTACHED FILE</p> <p>The strategy for housing in North Walsham completely fails to take into consideration the negative effects of increased traffic volumes on Station Road in Coltishall.</p> <p>The width and routing profile of the B1150 at Station Road makes it completely unsuitable for large vehicles. It is physically impossible for two large vehicles to pass without one of the vehicles illegally mounting the pavement.</p> <p>Adding risks to pedestrians and road users in Coltishall by increased traffic (which increased to an increased likelihood of an accident) without any mitigation to reduce risk, in my view makes the plan neither legally compliant or sound.</p> <p>By adding traffic volumes to this road, NNDC becomes complicit in the illegal mounting of pavements by large vehicles.</p> <p>Additionally, the road contours the junction of Westbourne Road with B1150 Station Road creates a high risk to pedestrians crossing the road due to impaired views caused by the bend in the B1150 looking south. I simply do not understand how this section of road can be deemed safe for a 30 mph speed limit.</p>
Modifications requested	<p>SEE ATTACHED FILE</p> <p>Identify by means of a study and then address the problems associated with the B1150 at Station Road in Coltishall.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	Traffic 1 2.jpg

Consultation Point Title	Housing
Consultation Point Number	7
Section of the Plan	7 Housing
ID	LPS123
Response Date	24/02/2022 16:19:46
Name	Mr. John Edwards
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	The Housing section (Section 7) is not effective or justified for the settlements on or near the coast in the far west of the District. Housing (Section 7) is unsound as it does not address the specific need for housing for local residency in the settlements adjoining the Heritage and Undeveloped Coast area, and in particular in the largest settlement, Wells-next-the-Sea. This need is outlined in the 'Housing Needs Assessment for Wells, Holkham, Walsingham, Warham and Wighton Final Report - March 2021' previously supplied. Further, median house prices (ONS data) are at twice the District level, and second and holiday home ownership is at the highest level in the District. The strategic approach needs consideration of the utility of 'principle/primary residence' as in other parts of the Eastern and the South West Regions of the UK.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Housing
Consultation Point Number	7
Section of the Plan	7 Housing
ID	LPS284
Response Date	01/03/2022 11:03:47
Name	Mrs Clare Stagg
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	

<p>Has the duty to cooperate been met? * Yes * No</p>	
<p>Do you consider the plan to be Sound? * Yes * No</p>	No
<p>Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy</p>	It is not effective
<p>Explanation</p>	<p>As a resident to East Runton I am keen to ensure protection of all of the current village amenity.</p> <p>I have found this form quite complex to use and not user friendly so i am sorry if this is not in the correct places.</p> <p>However I am keen to ensure any policy protects all current village amenity - in terms of retail and A4 use and takeaway. We have the fishing boat, Sammy's (currently in for change of use), bernies, a fish and chip take away and the village shop and the butchers.</p> <p>We have lost in the last few years the Village tea rooms with associated shop, the Kit Bag and the Constantia. To preserve village amenity, tourism and employment i would like the plan to support new retail/A4 uses, and enshrine in policy of strong protections of what is existing.</p> <p>This supports local use and is environmentally friendly in so far as not requiring village residents to have to drive to other locations - and supports tourism - the village is on the coastal path and creates local employment.</p> <p>Housing where developed should focus on affordable housing for locals - not second homes. There is limited need and what need there is surely is for locals.</p>
<p>Modifications requested</p>	<p>As a resident to East Runton I am keen to ensure protection of all of the current village amenity.</p> <p>I have found this form quite complex to use and not user friendly so i am sorry if this is not in the correct places.</p> <p>However I am keen to ensure any policy protects all current village amenity - in terms of retail and A4 use and takeaway. We have the fishing boat, Sammy's (currently in for change of use), bernies, a fish and chip take away and the village shop and the butchers.</p> <p>We have lost in the last few years the Village tea rooms with associated shop, the Kit Bag and the Constantia. To preserve village amenity, tourism and employment i would like the plan to support new retail/A4 uses, and enshrine in policy of strong protections of what is existing.</p> <p>This supports local use and is environmentally friendly in so far as not requiring village residents to have to drive to other locations - and supports tourism - the village is on the coastal path and creates local employment.</p> <p>Housing where developed should focus on affordable housing for locals - not second homes. There is limited need and what need there is surely is for locals.</p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	
<p>Justification for appearing at hearing</p>	
<p>Attachment(s)</p>	

7.1 Delivering Sufficient Homes

Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	7.1
Section of the Plan	7.1.1
ID	LPS649
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified
Explanation	<p><i>7.1.1 Over the period 2016 to 2036 the population of North Norfolk is projected to grow by around 7,781 (2016 National Projections).</i></p> <p>Based on this statement, the Local Plan is not justified or effective. Nor is it positively prepared to meet local objectives of housing for local people and families who will work in the area.</p> <p>If the projection is of fewer than 8,000 people, it is not clear why there is a need 9,600 new houses, even allowing for uplift and 10% second homes; this would imply average household sizes of less than one person. The Plan therefore exceeds the “objectively assessed need”, which Weybourne Council in any case thinks is over-inflated.</p> <p>The figure of 8-10% of houses being second homes implies that about 1,200 of the houses to be built are likely to be second homes. Bearing in mind the fact that these are likely to be concentrated in the coastal village and towns, this suggests that a very significant proportion of the new houses in coastal areas are expected to become second homes. It is widely recognised that there comes a point where the proportion of second homes in a settlement is so high, that it results in villages losing their heart, and becoming socially unviable. It should also be noted that building additional houses in villages that are popular for holiday homes does not protect existing houses from becoming second homes. The need for appropriate housing for people of working age who will allow the North Norfolk area to function economically have not been taken into account.</p> <p>It is our understanding that the 9,600 new houses does not include social housing, so in fact there are likely to be more than the 9,600 new houses. Why is social housing not included in the total? Community-led developments are likely to meet local needs better, to meet less local opposition, and to fit better into the local area.</p>
Modifications requested	<p>The Plan needs to be based on more realistic forecasts of actual local need.</p> <p>There needs to be some form of restriction or covenant on the use of these new houses as second homes. Planning permission should be required for changing a property from a primary residence to a second home, and permission should be denied in villages where the proportion of holiday homes is, or would become, higher than the viable level.</p> <p>Housing development should be focused on creating accommodation for families and people of working age who will be the lifeblood of communities.</p>

	Social housing should be included within the total number of houses required, as this would be much better at meeting local needs than commercial developments.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	7.1
Section of the Plan	7.1.4
ID	LPS650
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<p><i>7.1.4 The current standard national methodology is based on Office for National Statistics (ONS) projections with a 2014 start date. The Authority does not consider that these 2014 based projections accurately reflect likely future growth rates in the District because they project forward higher rates of annual growth than were subsequently shown to have actually occurred. The Office of National Statistics published revised projections with a base date of 2016 and the Council considers these to be a more robust basis for establishing the future requirement for homes in the District.</i></p> <p>This does not meet the "Effective" or "Justified" tests of soundness.</p> <p>The Plan admits that the 2014 estimates were inaccurate. According to 7.1.3, "household projections ... are published every two years by the Office for National Statistics". This means that there should have been estimates for 2018 and 2020, and that the current Plan does not accurately reflect the "objectively assessed needs" of the District.</p>
Modifications requested	The Plan should use the most recent statistics in order to more accurately reflect the "objectively assessed needs" of the District.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	7.1
Section of the Plan	7.1 Delivering Sufficient Homes

ID	LPS287
Response Date	01/03/2022 11:24:00
Name	Miss Donna Clarke
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	It is not clear to me why Briston and Melton Constable are considered growth villages. Melton Constable lacks infrastructure and available land whereas Briston does not.
Modifications requested	No further housing development should be allocated in Melton Constable for this reason and because it is a Conservation Area.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	7.1
Section of the Plan	7.1 Delivering Sufficient Homes
ID	LPS232
Response Date	24/02/2022 11:34:00
Name	C & S Norfolk Ltd
Organisation	C&S Norfolk Ltd
Agent Name	Ms Gabrielle Rowan
Agent Organisation	Pegasus Group
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	SEE ATTACHED FILE

	Please see attached comments (ref: P19-1073-NNLP Reg 19 Repls-February 2022)
Modifications requested	SEE ATTACHED FILE Please see attached comments (ref: P19-1073-NNLP Reg 19 Repls-February 2022)
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	P19-1073-NNLP Reg 19 repls- February 2022.pdf (3)
Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	7.1
Section of the Plan	7.1 Delivering Sufficient Homes
ID	LPS420
Response Date	07/03/2022 18:18:00
Name	Sarah Peters
Organisation	ABZAG Ltd
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified; It is not consistent with national policy
Explanation	<p>Inconsistency in base data used, therefore, unlikely calculations are correct and no confidence in outcomes.</p> <p>Paragraph 2.1.2. has the then 2016 resident population as 103,587 and the ONS predicted population for North Norfolk as 112,078 by 2036, while paragraph 7.1.1 has the population growth through the Plan Period of 7,781 and then incorrectly states that the population will be only 108,893 which is c3,000 understating the projections in 2.1.2. and 7.1.1.</p> <ul style="list-style-type: none"> • Paragraph 2.1.2. has the population of North Norfolk by 2036 as 112,078 • Paragraph 7.1.1. has 103,587 + 7,781 = 111,368 <p>Both these numbers are significantly higher than the 108,693 quoted in paragraph 7.1.1.</p> <p>Homes in the District used as second homes is shown as 8-10%. On what basis is this percentage being used, where is the evidence to support this?</p> <p>In a number of the identified allocations the percentage of second homes already out strips this percentage (over 40% in some) and is likely to increase further. Therefore, the new homes built are not going to fulfil the OAN but instead cause further migration to the District as more second home owners are attracted.</p> <p>Specific areas of issue are:-</p> <ul style="list-style-type: none"> • Large Growth Towns – Cromer • Small Growth Towns – Holt, Hoveton, Sheringham and Well-next-the-Sea • Large Growth Villages – Blakeney, Briston & Melton Constable, Ludham and Mundesley • Small Growth Villages – all costal villages

	<p>A higher percentage needs to be taken into account in the OAN.</p> <p>Failure to use the standard national methodology. Buffer (7.1.8.) of 5% is too small as continue to fail to deliver homes needed. Extra over 9,600 all either 'windfall' of unallocated Small Growth Villages which are unlikely to deliver. Housing delivery needs to be based on more than numbers which are just wishful thinking.</p> <p>Windfall developments 1,890 plus 452 (SS1) unrealistic – 2,342homes delivered through unallocated sites, over 24% of the 9,600. This is not good planning.</p> <p>Dwellings with permission or completed total – 4,815. Allocated – 4,900</p> <p>This will result in close to 25% of the homes delivery plan is on a 'wing and a prayer', which demonstrates that the NNDC Local Plan is NOT SOUND.</p>
Modifications requested	Use the correct population numbers and estimates. Then calculate the correct OAN for housing numbers.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	No confidence in getting numbers correct.
Attachment(s)	

Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	Policy HOU 1
Section of the Plan	HOU1
ID	LPS136
Response Date	21/02/2022 15:44:18
Name	Mrs Gemma Harrison
Organisation	Holt Town Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	No
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared It is not effective; It is not justified
Explanation	<p>Holt Town Council OBJECT to the proposed policy HOU1, in particular, the proposed housing growth for the market town of Holt. Cllrs welcome the proposed growth; however, they feel it does not go far enough to deliver houses for the town and its visitors. Cllrs believe this policy and what it proposes for Holt is unsound. The Local Plan should have at least 15 years of life in it and yet the proposed growth for Holt will not fulfil the need for houses in Holt in the next 15 years. In the last 12 months two new care home have been granted planning permission and a new Primary School. There is also planning permission for a new supermarket for the town. The two new care homes and proposed supermarket will provide many new jobs but as the Local Plan only promises to deliver 207 new dwellings, those wishing to live near their place of work will struggle. The demand for housing, as in other towns in North Norfolk, is high with residents competing with the second home and holiday home market. This demand has increased since the pandemic, as now more people are able to work from home they are choosing to relocate to the coast. The Local Plan has not adapted itself to reflect this change brought about by the pandemic.</p> <p>The Town Council have made NNDC aware of its views and feels this element of the plan has not been positively prepared. There is land available south of the A148 which is not particularly environmentally sensitive and therefore ripe for development. With two care homes and a proposed supermarket positioned south of the A148, this area of the town would be a natural extension, away from the sensitive AONB area and coastal areas. Holt Town Council requests the Planning Inspector and NNDC to look at this area of land for development and increase the number of dwellings proposed in order to meet the needs of the town and ensure those wishing to continue to live in the town have the opportunity to do so.</p>
Modifications requested	More growth needs to be identified for Holt on the land south of the bypass. NNDC need to go further to accommodate the existing and future demands for housing stock in Holt. The plan needs to be fit for purpose and provide the growth needed for the town in the next 15 years to make the plan viable and work for Holt. Therefore the housing numbers should be significantly increased from 207 new allocations contained in the plan.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s)	Yes, I wish to participate in hearing session(s)

* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	In order to explain to the Inspector the current situation in more detail.
Attachment(s)	
Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	Policy HOU 1
Section of the Plan	Policy HOU 1 Delivering Sufficient Homes
ID	LPS105
Response Date	18/02/2022 15:02:04
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	In Coastal Ward, I hear concerns that building 9600 new dwellings will put excessive strain on existing infrastructure. I also hear concerns about new dwellings being sold as second and holiday homes.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	Policy HOU 1
Section of the Plan	Policy HOU 1 Delivering Sufficient Homes
ID	LPS167
Response Date	23/02/2022 14:38:27
Name	Miss Naomi Chamberlain
Organisation	Norfolk County Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes	Yes

* No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	The emerging Local Plan aims to deliver a minimum of 9,600 new homes over the plan period 2016-2036 or 480 per annum. As part of this total a minimum of 2,000 affordable dwellings will be provided. Considering existing completions and commitments (planning permissions) this leaves the District Council needing to identify/allocate a further minimum of 4,758. To achieve this specific development sites suitable for not less than 4,900 new dwellings are allocated in the plan. The County Council welcomes the further details provided on how the housing figures have been calculated and whilst we support the broad housing numbers it is suggested that local plan period should be amended to 2020-2036 and reflect the latest government figures of 552 houses per annum. The County Council welcomes the distribution of housing set out in table 5, which enables the planning and provision of supporting infrastructure in these identified locations.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	Policy HOU 1
Section of the Plan	Policy HOU 1 Delivering Sufficient Homes
ID	LPS227
Response Date	24/02/2022 11:28:00
Name	Ms Sarah Mitchell
Organisation	RSPB
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not consistent with national policy
Explanation	Given the risks identified in the Likely Significant Effects screening of the HRA, we would welcome an additional bullet point to acknowledge this risk with reference made to HRA requirements for international sites.
Modifications requested	An additional bullet point could mirror text used elsewhere in the Plan 'Submission of adequate information in order to undertake a project Level Habitat Regulation Assessment, addressing issues relating to important species and habitats to mitigate impacts on European sites, will take place.'
Appear at examination hearing session(s)?	No, I do not wish to participate in examination hearing session(s)

* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	Policy HOU 1
Section of the Plan	Policy HOU 1 Delivering Sufficient Homes
ID	LPS228
Response Date	24/02/2022 11:27:25
Name	C & S Norfolk Ltd
Organisation	C&S Norfolk Ltd
Agent Name	Ms Gabrielle Rowan
Agent Organisation	Pegasus Group
Do you consider the plan to be Legally Compliant?	Yes
* Yes	
* No	
Has the duty to cooperate been met?	Yes
* Yes	
* No	
Do you consider the plan to be Sound?	Yes
* Yes	
* No	
Reason(s) not Sound	
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	SEE ATTACHED FILE Please see attached comments (ref: P19-1073-NNLP Reg 19 Reps-February 2022)
Modifications requested	SEE ATTACHED FILE Please see attached comments (ref: P19-1073-NNLP Reg 19 Reps-February 2022)
Appear at examination hearing session(s)?	No, I do not wish to participate in examination hearing session(s)
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	P19-1073-NNLP Reg 19 reps- February 2022.pdf (1)
Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	Policy HOU 1
Section of the Plan	Policy HOU1 Delivering Sufficient Homes
ID	LPS304
Response Date	03/03/2022 09:02:21
Name	
Organisation	White Lodge (Norwich) Ltd
Agent Name	Mr Sam Hazell
Agent Organisation	Lawson Planning Partnership Ltd
Do you consider the plan to be Legally Compliant?	Yes
* Yes	
* No	
Has the duty to cooperate been met?	Yes

* Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	<p>SEE ATTACHED FILE</p> <p>The Plan is unsound when considered against the related tests set out in paragraph 35 of the NPPF (2021) as explained below.</p> <ul style="list-style-type: none"> • Not Positively prepared– the proposed Small Growth Village Strategy approach will not provide enough homes of the right type in the right places for a growing population to meet the area’s needs (including affordable) and could frustrate the delivery of sustainable housing development. • Not Justified– the strategy is not appropriate, taking into account the reasonable alternative to allocate suitable and available sites in Small Growth Villages, and is not based on proportionate evidence. • Not Effective– the plan does not provide landowners/ developers with sufficient planning certainty and will not therefore, deliver the required development, including affordable housing, in Small Growth Villages over the plan period. • Not Consistent with National Policy– The proposed Small Growth Village Strategy approach will not deliver sufficient homes, nor support community vitality & services viability, it will not therefore enable the delivery of sustainable development in rural areas. This approach would run counter to para 78 which states, “In rural areas, planning policies and decisions should be responsive to local circumstances and support housing development that reflect local needs”, and para 79, “To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.” <p>We OBJECT to HOU1 which places a level of certainty on the yield from Small Growth Villages delivered through Policy SS1 Spatial Strategy, which is unjustified as set out in detail in our representations on Policy SS1, and further below.</p> <p>Policy HOU1 states, the Council will aim to deliver a minimum of 9,600 new homes over the plan period 2016-2036. As part of this total a minimum of 2,000 affordable dwellings will be provided. To achieve this, specific development sites suitable for not less than 4,900 new dwelling are allocated. However, the ‘Dwellings provided on Allocated Sites inclusive of specialist elderly accommodation’ column total is only ‘4,764’.</p> <p>Small Growth Villages are apportioned 7.6% of overall housing growth amounting to 452 dwellings, which is included in the Allocations Sites column. However, these are in fact not allocations. Table 2 Small Growth Villages Apportionment states, the 452 figure is indicative only, and their delivery is not sufficiently certain based on the evidence prepared in support of the Plan, as set out in detail in the representations letter dated 1st March 2022, attached.</p> <p>Policy HOU1 will not therefore, achieve its purpose to ensure that all existing and future housing needs are met in suitable locations.</p> <p>Please also see separate representations which request changes to the approach and detailed wording of Policy SS1, Policies Map, Policy HOU2, Policy HC4, Policy E6, and Policy DS1, which provide further justification in support of our representations on the Plan which should be read as a whole.</p>
Modifications requested	<p>SEE ATTACHED FILE</p> <p>In order to ensure that all existing and future housing needs are met in locations that comply with the Settlement Hierarchy, the Plan should be modified to identify site allocations for housing developments of appropriate scale at Smaller Growth Villages. The amended Small Growth Villages Strategy approach and subsequent housing site</p>

	allocations in Small Growth Villages should be reflected in Policy HOU1 accordingly, and as set out in detail in the representations letter dated 1st March 2022, attached.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	In accordance with our legal right to appear before and be heard by the inspector at the hearing. We wish to elaborate on our representations, which set out the changes we have requested to the strategy approach and the identified interrelated policies that are required to make the plan sound.
Attachment(s)	176_HighKelling_Reg19.Reps.Letter.FINAL_1.3.22.pdf (3) FINAL LPPRepslett WhiteLodge NNLP 18.06.19.pdf (3)
Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	Policy HOU 1
Section of the Plan	Policy HOU 1 Delivering Sufficient Homes
ID	LPS311
Response Date	03/03/2022 11:24:18
Name	
Organisation	Westmere Homes
Agent Name	Alex Munro
Agent Organisation	Armstrong Rigg Planning
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively preparedIt is not effectiveIt is not consistent with national policy
Explanation	SEE ATTACHED FILE The Plan's Housing Target To set the overall context of our client's concerns with the plan strategy it is firstly important to outline their concerns with the level of ambition shown by the plan in respect of achieving its housing target. In order to meet the identified housing requirement of 9,600 dwellings between 2016-2036, Policy HOU1 sets out a notional supply of 12,096 dwellings to come forwards on committed sites and new allocations. However, it is clear from the plan's housing trajectory that the Council only realistically expects to deliver 10,599 dwellings during the plan period. We firstly appreciate that the plan's housing target is in fact 10% higher than the district's objectively assessed need which is summarised at paragraph 7.1.4 of the document (albeit in the context of allocating enough land for 12,000 new homes). This uplift is built in as a measure to extend choice and flexibility to the market. Our client supports this approach to providing a supply buffer above the housing requirement to allow for flexibility as not all sites will deliver the expected number of homes during the plan period. It is, however, common practice for Local Plans to include a supply buffer of approximately 20% as a way of ensuring that the housing requirement is deliverable and that a robust 5-year housing land supply can be maintained. North Norfolk's proposed supply buffer of 10% is only half of this. We consider that it is vital that the council applies a far more precautionary approach on the basis that the district has consistently struggled to maintain an adequate supply of new homes in recent years, demonstrating that delivery is clearly an issue locally. Indeed, as recently as November 2021 an Inspector presiding over an appeal at Briston (Appeal Ref:

APP/Y2620/W/20/3256225) confirmed that the Council cannot demonstrate a sufficient 5-year supply of housing land.

Five Year Housing Land Supply

Coupled with our client's concerns in respect of housing delivery across the entirety of the plan period is the council's likely inability to secure a 5-year supply within the earliest years of the functional plan period. Paragraph 68 of the NPPF states that planning policies should identify a supply of specific, deliverable sites for years one to five of the plan period with an appropriate buffer as set out in paragraph 74.

The council has not published a 5-year housing land supply statement since April 2020, contrary to the requirement at NPPF paragraph 74 that local planning authorities must update their supply position annually. In this context, it is not possible to undertake a full review of the council's current housing supply position as the Housing Trajectory contained in the Local Plan does not contain a delivery forecast for specific sites with planning permission (it simply contains a total annual delivery forecast for all existing sites with planning permission).

However, based on the information that can be gleaned from this trajectory it is clear that the council cannot demonstrate a 5-year supply of housing for either the 2022/23 to 2026/27 5-year period or the 2023/24 to 2027/28 5-year period (we have tested both to provide latitude in respect of the applicable 'first five years' of the plan period). As set out in more detail below and in our enclosed Revised Housing Trajectory, we must therefore conclude that the Council will not be able to demonstrate a 5-year housing land supply on adoption of the Local Plan, contrary to NPPF paragraph 68.

5 Year Housing Land Supply Assessment

Housing Requirement

For this assessment we have used the housing requirement of 480 dpa set out at **Policy HOU1** although it should be recognised that the Council's correct Local Housing Need (LHN) is higher than this as set out above. The addition of a 5% supply buffer to the 480 dpa requirement in accordance with NPPF paragraph 74 gives a housing requirement of 504 dpa or 2,520 over 5 years.

Housing Supply

We have reviewed the Council's housing trajectory and have identified the following issues:

- **Windfall:** The Council set out in the housing trajectory that they expect windfall development to account for 135 dpa from 2022/23, delivering a total of 1,890 units over the plan period. We are concerned that there is considerable overlap between the delivery of existing permissions with the council only deducting a single year of windfall to ensure there is no double counting. This is insufficient and will not eliminate double counting of permissions in the windfall allowance over the first five years of the local plan from adoption. Much of the windfall development seen in the first three years after adoption will be from existing permissions and as such the council must exclude windfall from the first three years of the five-year housing land supply. As shown in our enclosed Revised Housing Trajectory, a total of 405 dwellings must be removed from both the 2022/23 to 2026/27 5 year period and the 2023/24 to 2027/28 5 year period.
- **Small Growth Village Sites:** It is unreasonable to assume delivery on these sites in 2023/24 as this is the year that the Local Plan will be adopted. Using our client's position and land as an example – whilst they are keen to pursue a planning application as soon as possible the lack of a draft allocation to provide certainty in respect of the council's intentions means that it is unlikely that they would risk an application until close to the point of the plan's adoption, so likely at some point in 2023. To allow time for securing planning permission, housing delivery at Small Growth Villages because of Policy SS1 can only be expected to realistically commence 2 years after the adoption of the Local Plan. We recommend that 69 dwellings should be removed from both the 2022/23 to 2026/27 5-year period and the 2023/24 to 2027/28 5 year period.
- **New Allocations:** The definition of deliverable at Annex 2 of the NPPF states that where a site has been allocated in a development plan it should only be considered deliverable where there is clear

evidence that housing completions will begin on site within five years. The council has presented no such evidence for any of the sites included in the trajectory. This evidence will need to be provided to the examination. However, to give the council the benefit of the doubt on some sites we have undertaken a review of each allocation against industry standard average lead-in times contained in Lichfields analysis in Start to Finish (Second Edition)[1]. Using this analysis and other evidence that indicates certain sites are not deliverable, we consider that:

- o 328 dwellings should be removed from the 2022/23 to 2026/27 5 year period; and
- o 458 dwellings should be removed from the 2023/24 to 2027/28 5 year period.

Taking the above reductions into account, we consider that the Council can only demonstrate a supply of:

- 2,104 dwellings during the 2022/23 to 2026/27 5 year period; and
- 2,144 dwellings during the 2023/24 to 2027/28 5 year period.

The council's resultant housing land supply position for each 5-year period is then set out below:

5 Year Housing Land Supply Calculation

2022/23 to 2026/27

2023/24 to 2027/28

A

Annual Requirement

504

504

B

Revised Supply Forecast

2,104

2,144

C

5YHLS (B / A)

4.17 years

4.25 years

On this basis there is a clear need for the council to be far more positive and proactive in respect of achieving growth across all tiers of the settlement hierarchy. As demonstrated above our client's land is sustainable in every respect and can deliver a greater number of homes than the apparent 16 dwelling cap applied to Little Snoring. Indeed, it can do this in a way that not only provides vital new homes to bolster the district's overall supply but as part of an overall development that will provide significant benefit to Little Snoring and its functional hinterland.

[1] <https://www.lichfields.com/insights/start-to-finish-what-to-look-out-for-in-the-local-plan-process/> [Accessed 09/02/22]

Modifications requested

SEE ATTACHED FILE

Suggested Amendment

In the context of the Council's ongoing difficulties with maintaining a sufficient supply of housing land, we consider that it is essential that a substantial supply buffer is included in the Local Plan. We recommend a buffer of at least 20%. To achieve this there will of course need to be additional growth apportioned to each tier of the settlement hierarchy with an additional impetus provided throughout the policies of the plan (**Policy SS1** in particular) to ensure that appropriate sustainable sites come forward swiftly and without burden and that best use is made of all appropriate development opportunities across the district.

Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	We consider that our evidence, and the consequences of the objection, is fundamental in respect of the objectives and outcomes of the plan.
Attachment(s)	L0008am NNDC LP Reqs Reg 19 Feb 2022 final.pdf L0008 - Enclosure 1. Revised Housing Trajectory.pdf
Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	Policy HOU 1
Section of the Plan	Policy HOU 1 Delivering Sufficient Homes
ID	LPS371
Response Date	07/03/2022 10:41:00
Name	
Organisation	Glavenhill Strategic Land
Agent Name	Ms Erica Whettingsteel
Agent Organisation	EJW Planning
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective
Explanation	The plan sets out the settlement hierarchy in Policy SS1, this identifies five tiers including the areas where development is not permitted. Policy HOU1 apportions the level of growth to each tier and the settlements contained within them. The table set out in the Policy HOU1 allocates 5.9% of growth to 'all remaining settlements and countryside'. This runs contrary to Policy SS1 which states that outside of the settlements listed in the heirarchy the remainder of the District is considered as countryside where development will not be permitted unless it is of the type allowed by Policy SS2 Development in the Countyside. The table needs to provide further clarity in order to provided consistency with Policy SS1 as currently worded it is misleading. The table further anticipates windfall development at 15.6% or 1890 dwellings over the plan period, equating to 126 units per annum. It is overly optimistic to assume that sites that are not currently identified will become available, progress through the planning process achieve detailed planning permission; have conditions discharged; commence work on site; and yield occupations within any five year housing land supply assessment. Furthermore, it is known that a boom market is needed to persuade people to sell off garden land or change from and existing use to an alternative use (especially previously developed land with clean-up costs etc after an existing use value is ascertained). Otherwise value is just not there. We are currently experiencing such a boom and with windfalls being finite, and with such a flow having been maximised in the past 2-3 years (and currently) it is unrealistic to assume the rates of delivery anticipated in the plan.
Modifications requested	For the reasons set out in answer to question 5, the table in Policy HOU1 needs amending to ensure that the Plan is effective and positively prepared.
Appear at examination hearing session(s)?	No, I do not wish to participate in examination hearing session(s)

* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	Policy HOU 1
Section of the Plan	Policy HOU1 Delivering Sufficient Homes
ID	LPS387
Response Date	07/03/2022 11:40:48
Name	
Organisation	D L Ritchie Will Trust
Agent Name	David Jones
Agent Organisation	Armstrong Rigg Planning
Do you consider the plan to be Legally Compliant?	
* Yes	
* No	
Has the duty to cooperate been met?	
* Yes	
* No	
Do you consider the plan to be Sound?	No
* Yes	
* No	
Reason(s) not Sound	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	SEE ATTACHED FILE
Modifications requested	SEE ATTACHED FILE
Appear at examination hearing session(s)?	Yes, I wish to participate in hearing session(s)
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	To participate in debate
Attachment(s)	Enclosure 4 - Policy HOU1 - Delivering Sufficient Homes.pdf
Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	Policy HOU 1
Section of the Plan	Policy HOU 1 Delivering Sufficient Homes
ID	LPS425
Response Date	07/03/2022 18:06:59
Name	
Organisation	Richborough Estates
Agent Name	Mrs Raj Bains
Agent Organisation	Boyer Planning
Do you consider the plan to be Legally Compliant?	
* Yes	
* No	
Has the duty to cooperate been met?	
* Yes	
* No	
Do you consider the plan to be Sound?	No
* Yes	
* No	

<p>Reason(s) not Sound</p> <ul style="list-style-type: none"> * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy 	<p>It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy</p>
<p>Explanation</p>	<p>Please refer to full statement of representations (see LPS263) on behalf of our client.</p> <p>Policy HOU 1 of the emerging Local Plan sets a minimum housing requirement of 9,600 dwellings over the 20-year plan period, with 480 dwellings to be completed per annum. This is based on the national standard housing methodology using 2016-based projections and the (2020) affordability ratio for the District . Through specific site allocations and policies, the Local Plan allows for the total delivery of around 12,000 new homes over the 20-year plan period.</p> <p>The emerging plan reports, between 2016-2036, the population of North Norfolk is expected to grow by 11,000 people, presenting an 11% increase. The overall housing requirement of 12,000 new homes presents a reasonable approach towards meeting the needs of an increasing population.</p> <p>However, the housing trajectory set out in the emerging Local Plan identifies an unrealistic projection of housing delivery over the first 7 years of the plan period and suggests an annual delivery of 502 to 812 dwellings per annum will be completed.</p> <p>This is shown below:</p> <p>2023/24 – 505 dpa 2024/25 – 502 dpa 2025/26 – 593 dpa 2026/27 – 812 dpa 2027/28 – 664 dpa 2028/29 – 599 dpa 2029/30 – 638 dpa.</p> <p>The emerging plan also notes that in the period of 2016-2021 around 2,422 new homes were built with an average delivery rate of 497 dwellings per annum. The annual requirement during this period was 480 dwellings per annum, however the actual completions over the last 5-year period are:</p> <p>2016/17 – 442 dpa 2017/18 – 546 dpa 2018/19 – 534 dpa 2019/20 – 419 dpa 2020/21 – 481 dpa</p> <p>The Council's highest number of completions (546 dpa) were in 2017 and 2018. In 2019/20 there was an under delivery of 61 dwellings and in 2020/21 there were 481 completions, which just reached over the annual requirement, indicating a slower build out rate.</p> <p>Based on the above past delivery rates, it is not clear what evidence the Council has considered to indicate that a significantly higher rate of delivery is likely to be achievable in the District, in comparison to what has been achieved previously. There is no information within the evidence base to suggest the market would be able to sustain a significantly higher rate of delivery. A high delivery rate in two consecutive years (2017/18 and 2018/19) does not provide a robust or credible evidence base to suggest increasing levels of delivery are achievable during the plan period.</p> <p>We strongly consider that the Council have overestimated the level of supply likely to come forward as set out in the housing trajectory in the emerging plan. The majority of housing provision is expected be delivered from proposed site allocations (5,408 dwellings) to which no evidence is provided to support these projections.</p> <p>The housing trajectory includes the proposed delivery of the North Walsham SUE, which proposes 1800 new dwellings during and beyond the plan period. Noting that the proposed trajectory accepts 1037 dwellings will be completed post-plan period, 763 dwellings are expected to be completed from 2026/27 through to 2036.</p> <p>As we have previously expressed in the North Walsham Western Extension Initial Consultation in June 2021, given the site-specific constraints attributed to the proposed SUE (Policy NW62/A), we consider that this site is not deliverable at the rates set out within the housing trajectory over the proposed plan period.</p> <p>The site is subject to the approval of a Development Brief and Design Code, which is yet to be prepared. The site is also subject to the early delivery of a new link road, which is yet to be assessed following a Stage 2 Feasibility Study. Given the site size and scale of the proposed site, our investigations show there are multiple and different land ownership titles attached to the site.</p> <p>These challenges are critical to the delivery of the proposed site and in the absence of robust information that would support the sites deliverability; we strongly consider the development of the site will not begin until 2030 at the earliest. This will leave 6 years, which is essentially the latter part of the proposed plan period to deliver 763</p>

dwellings. These considerations are detailed further in Section 7 of these representations.

Whilst we support the Council's approach to a large scale and quantum of growth in North Walsham, the duration and lead times associated with the delivery of significant numbers of dwellings from the SUE is highly unlikely to be achievable within the plan period. This policy approach is not realistic or sustainable and would lead to an unsound plan, as it would fail to meet the current housing requirement.

As set above, we consider the proposed Local Plan not justified and therefore contrary to paragraph 35 of the NPPF (2021). In the absence of robust and credible evidence to support the proposed allocation of the SUE, the proposed plan fails demonstrate that the level of growth proposed in the housing trajectory would be deliverable during the plan period.

Our concerns are that there would be insufficient growth and development in North Walsham and the District as a whole between 2023 -2030 (assuming adoption of the Local Plan in 2023) to meet the housing requirement.

Insufficient housing development between 2023 – 2030 in North Walsham

As per the Local Plan housing trajectory, noting that between the period of 2016 – 2021, 2,422 new dwellings were completed, there remains approximately 5,408 homes to be built through the proposed site allocations, 4,815 through commitments and 1,890 to be completed by windfall sites. In total, this accumulates to 12,113 dwellings over the plan period.

Although there is a small difference of 17 dwellings, the total amount of housing proposed in Policy HOU1 is 12,096. This is not accurate and needs updating to reflect 12,113, which is the total anticipated housing provision.

Policy HOU 1 proposes 5,408 dwellings are to come forward from proposed site allocations across the District over the plan period. In North Walsham 2,150 new dwellings are required from proposed site allocations. Noting that 1,037 dwellings would be completed post-plan period, the proposed housing provision in North Walsham equates to 1,113 dwellings to be completed between 2024-2036. This level of housing provision is proposed to come from the following two site allocations in North Walsham:

- Policy NW01/B Land at Norwich Road 7 Nursery Drive – 350 new dwellings (expected commencement from 2024/25).
- Policy NW62/A – Land West of North Walsham SUE – 1800 new dwellings (expected commencement from 2026/27).

This figure (1,113 dwellings) is likely to reduce further as it is highly unlikely that development of the proposed SUE will begin in 2026/27. The emerging Local Plan presents no evidence to suggest this site will come forward in 2026/27 and as a consequence threatens the delivery of housing in the emerging Local Plan.

In light of the proposed housing trajectory and the two proposed sites allocations in North Walsham, we consider that between 2023 -2030 there will be a lack of new homes completed in the first 5-7 years of the plan period, with the vast majority of the 1,113 dwellings to be completed towards the latter end of the plan period. This will lead to more dwellings being completed post-plan period and less dwellings available to the meet the local housing need in the short and medium term.

Whilst we support that the emerging plan proposes a minimum housing requirement of 9,600 dwellings, yet allows for the total delivery of 12,000 dwellings over the 20 year plan period, we strongly disagree that the proposed housing provision of 4,371 dwellings (inc.1037 dwellings completed post plan period) from site allocations will be delivered during the plan period. There is a heavy and over reliance that the proposed site allocations across the District will come forward, particularly the proposed SUE (Policy NW62/A) which is estimated to begin delivery from 2026.

Past housing delivery from adopted allocated site

Past housing delivery from the North Norfolk Adopted Site Allocations Development Plan (2011), Policy NW01 Land at Norwich Road - a mixed use development of 400 dwellings and 5ha of employment and open space is still not complete as 124 dwellings remain outstanding.

Planning permission was granted in 2014, for part of this site allocation to be developed, (Planning reference – PF/13/0866) for the erection of 176 dwellings, with access and open space and associated works and formation of the station car park and outline application for

employment. Planning permission (PF/15/2010) for a further 100 dwellings was granted in December 2016.

The allocated site from 2011 continues to feature in the most recent 5 Year Land Supply Statement (2020) and shows this site is incomplete. This is almost 10 years post adoption of the allocated site with 124 dwellings remaining outstanding on this site to be delivered.

Although the allocated site (Policy NW01) is a relatively a small site in comparison to Policy NW62/A, the past delivery rate of an allocated site presents a clear indication that a proposed SUE of a much larger scale will take a significant period of time to materialise and develop.

The proposed period of the Local Plan is 2016 – 2036. Following potential adoption in 2023, the remaining life span of the new Local Plan will be 13 years. We consider that the proposed SUE (Policy NW62/A) will take approximately 7 years for a site of this scale and size to begin development, leaving approximately only 6 years within the plan period to deliver development.

Average delivery rates of large sites

A detailed report published by Lichfields (2020) 'Start to Finish - Driving housing delivery from large sites: what factors affect the build out rates of large scale housing sites?' reports that the average planning approval period for a scheme between 1,500-1,999 dwellings is 5 years and a total of 7 years until delivery commences. On sites of this size, the research also shows that the average delivery rate is 102.5 dwellings per annum.

On this basis of this evidence, once the emerging Local Plan is adopted with the inclusion of Policy NW62/A, it would take approximately 24.5 years to deliver all the proposed dwellings of the SUE. In accordance with the Local Development Scheme (December 2021), the aim is to have the plan adopted by July 2023. This would result in all the dwellings of the SUE not being completed until early 2047, which is 11 years beyond the plan period.

Using the Council's proposed housing trajectory, if this was to be pushed back where the proposed SUE started to deliver in 2030/31, a total of 550 dwellings would be completed in the plan period, leaving 1,250 dwellings to be completed post-plan period. These projections are shown below: 2030/31 – 30 dpa 2031/32 – 60 dpa 2032/33 – 100 dpa 2033/34 – 160 dpa 2034/35 – 100 dpa 2035/36 - 100 dpa

Using the Lichfield report on average delivery rates at 102 dpa from the SUE, this would equate to a total of 612 completions between 2030 – 2036 and 1188 dwellings to be completed post- plan period.

These lead times are not reflected in the emerging Local Plan and there is no evidence to suggest the projected housing delivery will come forward as per the housing trajectory. Therefore, in relation to the proposed SUE, we consider the housing trajectory to be overestimated in showing early delivery (from 2026) and unrealistically high delivery rates in comparison to other large sites. This is un-justified and leads to the plan being unsound.

Ultimately, the emerging plan fails to provide an adequate supply of housing throughout the plan period, particularly in the short and medium term. This does not meet the tests of soundness, as set out in paragraph 35 of the NPPF as there is no justification or robust evidence to support the approach the Council are proposing.

The proposed housing delivery of the SUE is not achievable in the short term and based on the Lichfield report is unlikely to begin until 2030. The proposed SUE is therefore considered a long-term solution to achieving overall housing needs and reinforces our view that additional small and medium sized sites should be allocated that are able to deliver immediately on adoption of the plan.

A significant consequence of the reliance of the SUE is that housing growth in North Walsham (a Large Growth Town), would see limited growth between 2023 – 2030 and the proposed housing strategy would fail to meet local housing needs.

Overall, the minimum housing requirement of 9,600 dwellings would not be achieved as the proposed site allocation (Policy NW62/A) is highly unlikely to deliver the expected housing provision during the plan period. As such Policy HOU 1 is not supported for the above reasons.

Taking all of the above into consideration, the emerging Local Plan does not meet the test of soundness identified in paragraph 35 of the NPPF (2021). The proposed plan fails to justify how the proposed site allocations particularly the SUE will deliver the overall housing requirement over the plan period. It is fundamental that this is fully

	<p>reviewed by the Council before the plan can be submitted for examination and considered for adoption.</p> <p>The emerging Local Plan fails to consider reserve /alternative sites in absence of proposed site allocations</p> <p>As discussed above, there is a strong possibility that the proposed strategic site allocations that are fundamental to the plan would be stalled. As a result, this would prevent the Local Plan from achieving the overall housing requirement and therefore lead to the Council being unable to demonstrate a 5 year housing land supply. This would lead to the Council being open to unplanned speculative housing applications in less sustainable locations.</p> <p>The First Draft Local Plan (Part 1) proposed Policy SD 3 - Settlement Hierarchy that identified a number of smaller site development opportunities in each of the selected settlements for growth. This policy, which essentially safeguarded housing provision in selected areas for growth is now omitted from the emerging plan. To provide for a resilient plan and a continuous and deliverable supply of housing, it is considered that this policy should be reinstated.</p> <p>The emerging Local Plan has not considered alternative or reserved sites in the absence that the proposed strategic scale proposed allocations fail to deliver as proposed. Neither does the plan support a policy that allows for flexibility in housing delivery by providing mechanisms for alternative sites to be brought forward if required or a commitment to an early plan review if a shortfall is identified.</p> <p>The Council's approach towards building flexibility into the plan to allow for changing circumstances is not present and therefore should be reviewed before the plan is submitted for examination.</p> <p>Paragraph 8 of the NPPF (2021) states that the achievement of sustainable development is linked to three overarching objectives: an economic objective, a social objective and an environmental objective. With respect to the first of these, the planning system should <i>'help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.'</i></p> <p>We therefore consider that the emerging Local Plan is unsound as it fails to meet the objectives of the NPPF by providing an adequate supply of housing. This is especially the case in North Walsham given that it is a Large Growth Town expected to achieve 23% of all housing growth in the District. The emerging plan is not justified. There is no evidence to support the proposed housing delivery and as such it is not deliverable and therefore fails to meet the tests of soundness.</p>
<p>Modifications requested</p>	<p>As the Local Plan has not considered alternatives or reserved sites in the absence that a proposed strategic site fails to come forward, we would suggest that the Local Plan is reviewed so that it includes a separate policy to allow for flexibility of housing provision to come forward over the course of the plan period.</p> <p>To ensure the Local Plan achieves the overall housing requirement and to help safeguard housing provision and to provide for a resilient plan, we would suggest that Policy SD3- Settlement Hierarchy of the First Draft Local Plan (Part 1) is reinstated where a number of sites are identified in selected settlements for growth.</p> <p>We would also suggest that land at Paston Gateway, is allocated within the emerging plan to ensure a sufficient amount of housing are available in the short and medium term (0-10 years of the plan period), particularly in North Walsham. We consider Land at Paston Gateway would be a suitable site that would be complementary for the Council to allocate alongside the proposed SUE, to ensure there is sufficient housing delivered over the plan period.</p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>Justification for appearing at hearing</p>	<p>Our representations provide fundamental concerns about the proposed policies contained in the Local Plan. It is critical the Inspector hears our views on why we think the Plan is unsound and will fail to meet local housing needs of North Norfolk. Ultimately, our views could help assist the Council in ensuring there is an adequate supply of new housing across the District and throughout the short term, medium and long term period of the Local Plan.</p>
<p>Attachment(s)</p>	

Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	Policy HOU 1
Section of the Plan	Policy HOU1 Delivering Sufficient Homes
ID	LPS651
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	Table 5 Completed & Planned New Growth by Settlement (2016-2036). This clause does not meet the "Justified" test of soundness. The table gives a total of 12,096 houses, of which 4,815 already have been built/have planning permission; since the target is 9,600, there is plenty of capacity for the required number of houses to be built, without the need to inflict additional developments on "small growth villages" and rural areas.
Modifications requested	The Plan needs to be based on more realistic forecasts of actual local need, and to avoid expansion of small villages simply to meet a quota.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	Policy HOU 1
Section of the Plan	Policy HOU 1 Delivering Sufficient Homes
ID	LPS419
Response Date	07/03/2022 13:39:39
Name	
Organisation	Holkham Estate
Agent Name	Mr Garth Hanlon
Agent Organisation	Savills (UK) Limited
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound?	No

* Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified
Explanation	SEE ATTACHED FILE <u>Land adjacent Holkham Road – object to HOU1</u> Savills (UK) Ltd is instructed by the Holkham Estate to make the necessary and relevant representations to the Regulation 19 version of the Local Plan for North Norfolk. As a major landowner within the District, it is important to engage with the Development Plan process and as such, the representations are submitted to ensure that the Plan is positively prepared, justified, effective and consistent with National Policy within the NPPF. This representation constitutes an objection to the Regulation 19 version of the Local Plan given that Policy HOU1 “Delivering Sufficient Homes” fails to meet the actual housing needs of the area and this is not effective. As such, it is our view that the plan is not positively prepared and is thus not effective. In such circumstances, it is our client’s view that further land should be allocated for residential development over and above the two proposed allocations in the Plan for Wells-next-the Sea (Sites W07/1 and W01/1). Both of these proposed allocations are the subject of separate representations by the Estate. A separate representation has been made by Savills (UK Limited) to the Council concerning Policy HOU1 in respect of the proposed housing requirement where the authority is advocating a departure from use of the Standard Method, as set out in national policy and guidance, arguing there are exceptional circumstances which justify an alternative approach. We do not consider there are exceptional circumstances that justify a departure from the Standard Method. The Standard Method should be used for North Norfolk, resulting in a housing requirement for the emerging Local Plan of 531dpa. The clear implications of this, in the event that the Inspector accepts this position, is the need for the Council to be including more allocations within its Plan. This representation this constitutes an objection to Policy HOU1. We have submitted a similarly worded representation to Policy W07/1 of the Plan on the basis that if the Inspector supports Savills case on housing numbers and there is a requirement to identify further allocations then we consider the expansion of the Holkham Road allocation (Policy W07/1) is appropriate. In a separate representation the Holkham Estate has expressed its support for the identification of Land adjacent to Holkham Road, Wells for a proposed allocation of 50 dwellings together with open space as set out in Policy W07/1 of the Local Plan. This site is considered to be suitable, available, and achievable and is in the single ownership of the Holkham Estate and who are able to bring forward the site within the plan period. Notwithstanding that representation of support for the allocation, the Estate is also submitting a representation to seek the identification of further land for residential development adjacent to this allocation under Policy W07/1. On the basis that this representation seeks a change to the Local Plan by allocating additional land for development, then this representation constitutes an objection to the Plan. Policy W07/1 within the Proposed Submission Version (Regulation 19 Publication) Local Plan has been altered from the earlier Regulation 18 version so that the envisaged capacity is now “approximately 50 dwellings” and the site area now measured to be 2.6 hectares, following the removal of the narrow strip of land connecting to Mill Road. It is assumed that such changes in terms of the site area and the change to 50 dwellings is a result of administrative checks. The retention of the word “ <i>approximately</i> ” reflects the recognition that there must be an inbuilt flexibility within the policy to allow for a detailed layout to be prepared following detailed technical analysis and which could generate a higher or lower number than 50 dwellings. Regarding the vehicular access to the site, the policy now makes it clear within site specific requirement number 3 that there should be “..... <i>provision of convenient and safe vehicular access to the site from Mill Road.</i> ”(note – references are made in paragraphs 17.2.4 and in 17.2.5 to Mill Lane . This should be corrected to read “Mill Road”)

It is confirmed that such vehicular access can be secured onto Mill Road (A149). Such a new access point could mean that the existing access to Mill Farm Holidays and the associated stables would be served by a new access point with the existing access being stopped up and changed to a footway. This falls within the 30 mph speed limit. This would create a new T-junction access point onto the A149 approximately mid-way along the southern frontage of the Site, at a point where visibility would be maximised in the horizontal of the plane and also at the top of the crest in the road where visibility would also be maximised in the vertical plane.

In respect of pedestrian and cycle access, site requirement 5 of the Policy requires the appropriate connections to Holkham Road, Mill Road and Bases Lane. These are shown on the accompanying plan. (**Appendix 1** to this representation)

The District Council's 'Background Paper 6 - Development Site Selection Methodology' to the May 2019 version of the Local Plan (page 122) identified the site to be a "Preferred Site" and stated "Considered suitable to be allocated for up to 50 dwellings and delivery of public open space."

The Council has continued to support the allocation in the Regulation 19 version of the Plan and in the Sustainability Appraisal published in January 2022 (page 125) concluded "The site is well positioned for access to the town centre, school and services. Highway access can be achieved off Mill Road. Although the site is within the Area of Outstanding Natural Beauty, considerate design and layout, together with the on-site open space, will mitigate the impact on the landscape. The site scores positively in the Sustainability Appraisal. The site is considered to be one of the more sustainable and suitable of the Wells alternatives."

In the circumstances where the creation of a new road link onto Mill Road is a critical part of the policy, the Estate considers that the opportunity to allocate further land close to this access point to create further land for new housing is appropriate. This is on the basis that a new road access and associated traffic movements linked to a new housing site will to an extent change the character of the land and that the provision of further land for new development will address our view that the plan needs to accommodate greater housing numbers than set out within the plan and that the settlement of Wells and this site in particular has the ability to accommodate such development.

It is our view that extending the proposed allocation in the manner proposed as set out in **Appendix 2** (see enclosed) allows for the development of some 3.6 hectares of development including 0.63 hectares of open space. The result of such an extension of the allocation in the manner shown is to allow for the potential for a further 20 dwellings to come forward over and above the 50 or so dwellings identified within the proposed allocation with the Plan. The identification of this contiguous parcel to the existing allocation within the plan at Policy W07/1 is considered to be a logical extension where the form of development would sit alongside the existing development along Mill Road at this edge of the settlement

In the event where the Council or the Inspectors would support the extension of the existing allocation to include more land to provide more housing, then this would mean the necessarily amendment to Policy HOU1 of the plan to account for the proposed extra number of dwellings on this site as well as changes to Policy W07/1 to read as follows:

"Policy W07/1
Land Adjacent Holkham Road
Land amounting to 3.6 hectares, as defined on the Policies Map, is allocated for residential development of approximately 70 dwellings, 0.6 hectares public open space, and associated on and off-site infrastructure.
Planning permission will be granted subject to compliance with the policies of this Plan, and the following site specific requirements:....."

Modifications requested

SEE ATTACHED FILE
Land adjacent Holkham Road – object to HOU1
Savills (UK) Ltd is instructed by the Holkham Estate to make the necessary and relevant representations to the Regulation 19 version of the Local Plan for North Norfolk. As a major landowner within the

District, it is important to engage with the Development Plan process and as such, the representations are submitted to ensure that the Plan is positively prepared, justified, effective and consistent with National Policy within the NPPF.

This representation constitutes an objection to the Regulation 19 version of the Local Plan given that Policy HOU1 "Delivering Sufficient Homes" fails to meet the actual housing needs of the area and this is not effective. As such, it is our view that the plan is not positively prepared and is thus not effective.

In such circumstances, it is our client's view that further land should be allocated for residential development over and above the two proposed allocations in the Plan for Wells-next-the-Sea (Sites W07/1 and W01/1). Both of these proposed allocations are the subject of separate representations by the Estate.

A separate representation has been made by Savills (UK Limited) to the Council concerning Policy HOU1 in respect of the proposed housing requirement where the authority is advocating a departure from use of the Standard Method, as set out in national policy and guidance, arguing there are exceptional circumstances which justify an alternative approach. We do not consider there are exceptional circumstances that justify a departure from the Standard Method. The Standard Method should be used for North Norfolk, resulting in a housing requirement for the emerging Local Plan of 531 dpa. The clear implications of this, in the event that the Inspector accepts this position, is the need for the Council to be including more allocations within its Plan.

This representation this constitutes an objection to Policy HOU1. We have submitted a similarly worded representation to Policy W07/1 of the Plan on the basis that if the Inspector supports Savills case on housing numbers and there is a requirement to identify further allocations then we consider the expansion of the Holkham Road allocation (Policy W07/1) is appropriate.

In a separate representation the Holkham Estate has expressed its support for the identification of Land adjacent to Holkham Road, Wells for a proposed allocation of 50 dwellings together with open space as set out in Policy W07/1 of the Local Plan. This site is considered to be suitable, available, and achievable and is in the single ownership of the Holkham Estate and who are able to bring forward the site within the plan period.

Notwithstanding that representation of support for the allocation, the Estate is also submitting a representation to seek the identification of further land for residential development adjacent to this allocation under Policy W07/1. On the basis that this representation seeks a change to the Local Plan by allocating additional land for development, then this representation constitutes an objection to the Plan.

Policy W07/1 within the Proposed Submission Version (Regulation 19 Publication) Local Plan has been altered from the earlier Regulation 18 version so that the envisaged capacity is now "approximately 50 dwellings" and the site area now measured to be 2.6 hectares, following the removal of the narrow strip of land connecting to Mill Road. It is assumed that such changes in terms of the site area and the change to 50 dwellings is a result of administrative checks. The retention of the word "approximately" reflects the recognition that there must be an inbuilt flexibility within the policy to allow for a detailed layout to be prepared following detailed technical analysis and which could generate a higher or lower number than 50 dwellings.

Regarding the vehicular access to the site, the policy now makes it clear within site specific requirement number 3 that there should be ".....*provision of convenient and safe vehicular access to the site from Mill Road.*"(note – references are made in paragraphs 17.2.4 and in 17.2.5 to Mill Lane . This should be corrected to read "Mill Road")

It is confirmed that such vehicular access can be secured onto Mill Road (A149). Such a new access point could mean that the existing access to Mill Farm Holidays and the associated stables would be served by a new access point with the existing access being stopped up and changed to a footway. This falls within the 30 mph speed limit.

This would create a new T-junction access point onto the A149 approximately mid-way along the southern frontage of the Site, at a point where visibility would be maximised in the horizontal of the plane and also at the top of the crest in the road where visibility would also be maximised in the vertical plane.

In respect of pedestrian and cycle access, site requirement 5 of the Policy requires the appropriate connections to Holkham Road, Mill

	<p>Road and Bases Lane . These are shown on the accompanying plan. (Appendix 1 to this representation)</p> <p>The District Council's 'Background Paper 6 - Development Site Selection Methodology' to the May 2019 version of the Local Plan (page 122) identified the site to be a "Preferred Site" and stated "<i>Considered suitable to be allocated for up to 50 dwellings and delivery of public open space.</i>"</p> <p>The Council has continued to support the allocation in the Regulation 19 version of the Plan and in the Sustainability Appraisal published in January 2022 (page 125) concluded "<i>The site is well positioned for access to the town centre, school and services. Highway access can be achieved off Mill Road. Although the site is within the Area of Outstanding Natural Beauty, considerate design and layout, together with the on-site open space, will mitigate the impact on the landscape. The site scores positively in the Sustainability Appraisal. The site is considered to be one of the more sustainable and suitable of the Wells alternatives.</i>"</p> <p>In the circumstances where the creation of a new road link onto Mill Road is a critical part of the policy, the Estate considers that the opportunity to allocate further land close to this access point to create further land for new housing is appropriate . This is on the basis that a new road access and associated traffic movements linked to a new housing site will to an extent change the character of the land and that the provision of further land for new development will address our view that the plan needs to accommodate greater housing numbers than set out within the plan and that the settlement of Wells and this site in particular has the ability to accommodate such development.</p> <p>It is our view that extending the proposed allocation in the manner proposed as set out in Appendix 2 (see enclosed) allows for the development of some 3.6 hectares of development including 0.63 hectares of open space. The result of such an extension of the allocation in the manner shown is to allow for the potential for a further 20 dwellings to come forward over and above the 50 or so dwellings identified within the proposed allocation with the Plan. The identification of this contiguous parcel to the existing allocation within the plan at Policy W07/1 is considered to be a logical extension where the form of development would sit alongside the existing development along Mill Road at this edge of the settlement</p> <p>In the event where the Council or the Inspectors would support the extension of the existing allocation to include more land to provide more housing, then this would mean the necessarily amendment to Policy HOU1 of the plan to account for the proposed extra number of dwellings on this site as well as changes to Policy W07/1 to read as follows:</p> <p>"Policy W07/1 Land Adjacent Holkham Road Land amounting to 3.6 hectares, as defined on the Policies Map, is allocated for residential development of approximately 70 dwellings, 0.6 hectares public open space, and associated on and off-site infrastructure. Planning permission will be granted subject to compliance with the policies of this Plan, and the following site specific requirements:....."</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To fully understand tthe detail of the Councils approach to its identification of the minimum housing figure within Policy HOU1 and the the assessment of the need to identify further housing allocations.
Attachment(s)	Appendix 1 - proposed access on Mill Road.pdf (2) Appendix 2 - Land at Mill Road.pdf (1)
Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	Policy HOU 1
Section of the Plan	Policy HOU 1 Delivering Sufficient Homes
ID	LPS441
Response Date	07/03/2022 15:12:09

Name	
Organisation	Savills (UK) Limited
Agent Name	Mr Garth Hanlon
Agent Organisation	Savills (UK) Limited
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	SEE ATTACHED FILE Savills (UK) Limited have prepared a detailed response to policy HOU 1 of the Plan and which is attached as Appendix 1 to this representation. It constitutes an objection to the Plan . There are no exceptional circumstances that justify a departure from the Standard Method and 2014-based SNHPs, and the use of the 2016-based SNHPs instead. The Standard Method should be used for North Norfolk, resulting in an average annual housing need of 531 dpa (a total of 10,620 over the 20-year plan period. If one were to apply the latest, 2018-based, SNHPs to the methodology as advocated by the LHNA 2019, this would result in an average annual housing need of 561 dpa (a total of 11,220 over the 20-year plan period).
Modifications requested	SEE ATTACHED FILE Please refer to Savills " North Norfolk Local Plan Assessment of Identified Local Housing Need" attached as Appendix 1 .
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	It is important to have a detailed analysis and discussion on housing figures in the context of Policy HOU1 having regard to the Council's position on this matter and the objections raised by Savills .
Attachment(s)	NN Assessment of Identified LHN FINAL 03 03 22.pdf
Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	Policy HOU 1
Section of the Plan	Policy HOU 1 Delivering Sufficient Homes
ID	LPS422
Response Date	07/03/2022 14:45:26
Name	
Organisation	Holkham Estate
Agent Name	Mr Garth Hanlon
Agent Organisation	Savills (UK) Limited
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound?	No

* Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	<p>SEE ATTACHED FILE</p> <p><u>Land south of Warham Road, Wells-next-the-Sea – object to policy HOU1</u></p> <p>Savills (UK) Ltd is instructed by The Holkham Estate to make the necessary and relevant representations to the Regulation 19 version of the Local Plan for North Norfolk. As a major landowner within the District, it is important to engage with the Development Plan process and as such, the representations are submitted to ensure that the Plan is positively prepared, justified, effective and consistent with National Policy within the NPPF.</p> <p>This representation constitutes an objection to the Regulation 19 version of the Local Plan given that Policy HOU1 “ Delivering Sufficient Homes” fails to meet the actual housing needs of the area and this is not effective.</p> <p>In such circumstances, it is our client’s view that further land should be allocated for residential development over and above the two proposed allocations in the Plan for Wells-next-the Sea (Sites W07/1 and W01/1). Both of these proposed allocations are the subject of separate representations by the Estate .</p> <p>A separate representation has been made by Savills UK Limited to the Council concerning Policy HOU1 in respect of the proposed housing requirement where the authority is advocating a departure from use of the Standard Method, as set out in national policy and guidance, arguing there are exceptional circumstances which justify an alternative approach. We do not consider there are exceptional circumstances that justify a departure from the Standard Method. The Standard Method should be used for North Norfolk, resulting in a housing requirement for the emerging Local Plan of 531dpa. The clear implications of this, in the event that the Inspector accepts this position, is the need for the Council to be including more allocations within its Plan.</p> <p>It is considered that the land at Warham Road at Wells next the Sea, the subject of this representation, can contribute to such a housing requirement. The plan as it currently stands is not sound on the basis that it has not been positively prepared, is not justified and not consistent with national policy and is thus not effective .</p> <p>It is requested that the Local Plan is amended (both Policy HOU1 and the Wells next the Sea Chapter) to include the allocation of a parcel of land off Warham Road in Wells-next-the-Sea for a largely residential development. The 12.4 hectare site consists of two agricultural fields surrounding New Farm on the south side of Warham Road, close to the junction with Stiffkey Road. The farm is in different ownership and does not form part of the proposed site for allocation.</p> <p>An existing track runs from Warham Road down the west side of the farm, leading to two light industrial units and an existing Victorian water tower which occupies the crest of a small hill. The lane is a public right of way (PROW) and this will be maintained as a key feature of the new development. From the crest of the hill the footpath drops down the slope connecting out into a series of public paths in the landscape to the south of the site.</p> <p>The east side of the site is defined by a mature field hedge. To the north, the site is bounded by dense mature planting along a disused railway cutting, around New Farm, and along the Warham Road frontage. The west side of the site is an open field which drops down the hill to meet the large playing fields behind the school on Market Lane.</p> <p>A Proposed Development Strategy document is submitted in support of this representation showing the site of some 12.4 hectares proposing a two phased development comprising some 100-130 homes within the first phase and some 60-80 homes in the second phase of development together with some light industrial commercial workspace. This is enclosed at Appendix 1. All of the land being promoted lies within the ownership of the Holkham Estate.</p> <p>The Proposed Development Strategy has been prepared by the Estate to support the case for a new allocation. The document provides a context for the document in terms of the emerging Local Plan (currently</p>

at Submission stage) and acknowledges that the proposed phased manner of the development provides the opportunity for an Inspector and the Council to consider whether one or more phases of development should come forward with the plan period up to 2036.

The document identifies the landscape and visual constraints of the site and assesses site access issues from Warham Road. It then sets out a broad development strategy by way of a general layout diagram together with a concept masterplan and then addresses the potential of a two phase development .

Site Assessment

It is acknowledged that a larger site was previously submitted for consideration as part of the Call for Sites stage of the Local Plan Review and which referred to as site W11.

The Housing and Economic Land Availability Assessment (HELAA) (June 2017) Appendix 2 assessed the site (reference H0288) - the site was larger in 2017 since it also included an area of land further to the east. Within the HELAA assessment the site scored positively (green) in respect of the following matters:

- The site is located off the Warham Road and could provide suitable access.
- The site is within 2,000m to a school and employment, and 1,200m away from a facility found in Wells-next-the-Sea.
- The site is located in Flood Zone 1, with a very small part of the site at risk of surface water flooding.
- For developments of greater than 10 properties it is assumed that some enhancement to capacity may be required.
- The site is noted to be greenfield site which consists of grassland with some boundary hedges. No known impact on designated site, protected species or ecological network.
- The site is compatible with existing neighbouring uses.
- The site is not in close proximity to any historic heritage assets or environment.
- The site is not located in the proximity of a heritage townscape.
- The site would not result in the loss of any open space.

In terms of Amber scoring, the suitability assessment noted

- The site is located within the Area of Outstanding Natural Beauty which has richly diverse and distinctive landscape. Development in this location should be sensitive to the wide skylscapes, seascapes and dark night skies and should protect the quality and character of Wells.
- In terms of landscape the site is located in an area designated as 'undeveloped coast'.
- In terms of contamination and ground stability the site is acknowledged to be mostly greenfield site but the mast to the rear of the may be contaminated and could affect development potential in terms of utilities infrastructure.

The Council scored the site negatively (red) in respect of the following criteria:

- Impact upon the local road network is considered to be unsuitable either in terms of road or junction capacity, or lack of footpath provision.
- Based on current evidence, the site is near to a settlement but the local road network is considered to be unsuitable

Both of these matters are addressed below within this representation

At that time the Council considered that the site was not suitable for development and by way of the HELAA sustainability comments stated that:

"The site is well related to Wells-Next-The-Sea, has access to facilities and utilities. The site is in FZ1. The site is in a moderate to high sensitive landscape within the ANOB, development in this location should be sensitive to the wide skylscapes, and dark night skies and any development proposals should protect the quality and character of Wells-Next-the-Sea. Undulating site rising to the south with mature trees along roadside boundary. Based on current evidence, the site is considered to be unsuitable as the local road network is considered to be unsuitable either in terms of road or junction capacity" (page 970 of HELAA Appendix 2)

The Council's assessment of the site as stated within its recently published Sustainability Appraisal (January 2022) at page 126, states:

"The site is remote and detached from the town and services. It would be a development in open countryside and could have an adverse impact on the landscape and the Area of Outstanding Natural Beauty. Highways access and the local network are considered to be

unsuitable. The site is not considered to be suitable for development. Furthermore, the preferred sites can deliver sufficient housing for Wells.”

This summary is difficult to reconcile with the summary of the findings of the HELAA when it comes to the assessment of the site and its relationship to Wells. The HELAA says it is well related and the Sustainability Appraisal says it is remote and detached. It is requested that the Inspector assess this matter for themselves given the competing views. The Estate considers that the site is well related having regard to its location on the edge of the settlement boundary in a location in our view which is the only suitable additional area for new development over and above the two allocations within the Plan having regard to topography, character and flood risk

In terms of the aspects which the Council raises by way of concern, we would make the following comments

Local accessibility and the road network

Warham Road is a single carriageway road with a carriageway width of approximately 6.1 metres. It is subject to a 30mph speed limit to the residential edge of the town and thereafter is subject to the national speed limit.

Approximately 150m northwest of the site boundary Warham Road connects with the A149 via a simple priority controlled junction.

The A149 is one of the two main roads for local and regional traffic in North Norfolk, the other being the A148. The A148 and the A149 link at King's Lynn and Cromer with the A149 following the coast between these two settlements and the A148 offering a more direct, cross district route. Accordingly the A148 and the A149 are important links in terms of traffic movements at both a local and regional level, as the wider road network can be accessed beyond Kings Lynn and Cromer.

To the west of the junction between Warham Road and the A149 is a simple priority junction where the A149 meets the B1105, which provides a route south from the town to the A148.

Regarding pedestrian and cycle accessibility, the footway provision along Warham Road consists of a single footway that is approximately 2m wide along the northern side of the carriageway. Prior to the junction between the A149 and Warham Road the footway switches from the northern side of the carriageway to the southern side with a very small section of on carriageway pedestrian facility. From the junction with the A149 there is a wider pedestrian network that links the site with the facilities and services provided within the town, including a series of controlled and uncontrolled crossing points at key locations.

The nearest bus stops to the site are located on the A149 between Warham Road and Polka Road. The bus stops provide for both eastbound and westbound bus journeys and are designated by a bus stop flag.

The most local railway stations for Wells-next-the-Sea are Sheringham station (approximately 17 miles) and Kings Lynn station (approximately 28 miles). Sheringham station has a frequent train service to Norwich and Kings Lynn station offers a regular train service to Ely, Cambridge and London.

On more site specific matters, Create Highway Engineers were instructed by Holkham Estate to assess vehicular access to the site and have concluded that an appropriate junction can be designed to allow for a suitable access onto Warham Road. This is in the form of a T junction with a carriageway width of 5.5 metres and of 43m x 2.4m x 43m visibility splays. This is capable of accommodating up to 150 dwellings. This new access point is also complemented by the provision of a new emergency access point to the east where it is provided with droppable bollards or similar.

In addition to this new junction to Warham Road, the engineers have assessed the need or otherwise to make necessary highway improvements to the junction at Warham Road and the A149. The drawing contained within the enclosed Proposed Development Strategy document (see Appendix 1) at page (shows these improvements and include the reduction in road width to improve visibility and the provision of a new zebra crossing.

It is considered that these improvements address the Council's comments about the unsuitability of the road network

Landscape Impact

It is acknowledged that the site falls to be considered within the Area of Outstanding Natural Beauty and which is a designation that covers the whole of Wells Next the Sea. Consequently any development that

occurs within the town or on the edge of town falls within such a designation. Given that two allocations have been identified with the AONB it is clear that there is no in built objection *per se* to development within the AONB.

Clearly in circumstances where there is a significant impact and the benefits of the development do not outweigh the harm caused, then that will be an issue to be assessed but it is our view that the scale of development proposed, the local character of the site and its context together with the need for further housing numbers in Wells, it is considered that development in the manner suggested is appropriate.

In support of the development proposal as set out with the Proposed Development Strategy document (see Appendix 1), The Landscape Partnership were instructed by the Holkham Estate to prepare a Landscape and Visual Statement to provide a high-level review of landscape (site features and landscape character) and visual receptors that might be affected by the proposed residential development at the site, and sets out ways that these effects could be negated or mitigated. (This is enclosed at **Appendix 2**)

In order to undertake the preliminary landscape and visual appraisal the following work stages were undertaken:

- Desktop study to identify an indicative zone of visual influence, any local statutory and non-statutory landscape-related designations, local public rights of way, and existing landscape character assessments covering the site and its vicinity.
- Field study to verify local landscape characteristics; provide commentary on the condition, sensitivity and capacity of the local landscape character to accommodate change of the type and scale proposed; appraise the contribution of any landscape features within the site that might be lost; identify and provide commentary on the sensitivity of key visual receptors.
- Identification of any parcels of land within the site that might have the capacity, in landscape terms, to accommodate residential development, to help inform the emerging masterplan.
- Identification of any broad mitigation measures that may be required if the proposed development is to be considered acceptable. These were summarised in a Landscape Strategy diagram which formed part of the brief to the architect for development the illustrative master plan.

The Landscape Strategy Diagram sets out mitigation measures that will operate in the near, mid-range views of the site, as follows:

- No development will take place around water-tower at the crest of the hill or on its south-facing slope. This area will be developed and retained as a public open space for the new development and wider town residents and visitors, comprising species-rich meadow planting for enhanced biodiversity value over existing use
- Development will be limited to the west side of the existing field hedge running north-south to the east of the water tower, to limit visual impact on glimpsed views from Warham Road in the approach to the town. The existing hedge is to be retained and enhanced by a 10m screen-planting zone, to mask the eastern flank of the proposed development.
- New 20m screen planting belts will be created to the west and south-west margins of site, to limit view of the proposed development from the footpaths and more distant road network to the south of the site.

It is acknowledged that the character of the side itself would inevitably change as a result of development however it is the case that the character of the site is somewhat influenced by its proximity to the existing urban edge, which reduces sensitivity compared to other parts of the character. In terms of sensitive features, there will be an impact on the existing trees which line Warham Road whilst retaining the network of hedges within the site. Whilst it is accepted that the proposed development would cause a change in character to the Open Rolling Farmland in the context of the Landscape Character Guidelines, these would be localised and contained given the new development would be associated with the existing urban edge and thus the effect on the character area would be limited. This is especially the case where mitigation planting would also help to integrate development within the landscape.

Regarding the views from the Wells/ Holkham Coastal Marshes (OCM6) as defined in the Landscape Character Guidelines for the AONB, views towards the site from this area would be limited although the new development will be visible from certain very distant points. Development on the north facing slope between Warham Road and

the water tower will be just visible in these very distant views. Planting within the development will soften its profile over time, and a new block of woodland between this part of the site and the water tower will eventually provide a rear 'backdrop' screen, so that the skyline silhouette will be of tree-tops rather than roofs.

Having regard to the above, it is our view that the proposed development is capable of being accommodated within the landscape having regard to the site's relationship to the settlement and the landscape within which it sits together with the plan and form of development and the mitigating measures being put forward.

Ecological Impact

A Preliminary Ecological Appraisal (PEA) was undertaken as it relates to the site and supports this representation. The appraisal included a habitat survey, protected species scoping survey and desktop study of protected and notable sites and species in the area. A site visit was undertaken on 17 March 2021. Following this appraisal, bat activity surveys were conducted between April and October 2021. This Ecology Report is enclosed at **Appendix 3**.

The Appraisal has concluded that the site contains habitats typical of the surrounding agricultural land use with much of the area being dominated by arable fields and modified grassland which are generally considered to be of low conservation value. However, these arable and grassland fields are important for key species, such as farmland birds and bats.

The key ecological factors for consideration at the site are:

- Potential impacts on Habitat Sites (i.e., former European designated/Natura 2000 sites);
- Potential presence of ecologically valuable hedgerows;
- Potential presence of great crested newts;
- Potential presence of reptiles;
- Potential impacts on protected bird species and bird species of conservation concern;
- Potential presence of roosting bats;
- Confirmed presence of commuting and foraging bats.

Further survey effort is required for a number of species groups to establish the full extent of key protected and notable species at the Site. The one species group that may have a significant on the available development footprint are bats and as such surveys have been conducted in 2021. The surveys identify the site as having important features for this species group, including the nationally rare and Norfolk Priority Species barbastelle. As recommended in the PEA, the illustrative masterplan includes dark buffer zones along the former railway cutting on the north flank of the site, down the west side of New Farm, adjacent to the retained existing track and hedges, and along the site entrance on Warham Road.

Additional survey effort should incorporate great crested environmental DNA survey, reptile survey, breeding and wintering bird surveys and a badger survey. Many of these surveys can only be completed at specific times of year.

A key aspect of the assessment will be identifying any potential impacts on the designated sites of international importance. The assessment will need to take into account direct impacts, such as potential loss of foraging and roosting habitats for birds, but also indirect impacts, such as increased disturbance resulting from higher visitor numbers in the coastal areas.

In summary, the Site has ecological features which must be recognised in the development process. However, such features are not unusual within farmland habitats, and providing suitable mitigation strategies can be established, they should not preclude future development. We would confirm that MKA Ecology who undertook the PEA have worked closely with the project team in producing the proposed Development Strategy document.

In order to ensure that the best opportunities for ecological mitigation and enhancing are achieved at the site it is recommended that in the event of an allocation, ecological input is made available throughout the master planning stages and to apply the Biodiversity Net Gain methodology at an early stage. Opportunities are available for enhancing the conservation value of the site and to deliver overall gains in biodiversity.

Summary

This site is being promoted by the Estate as a new allocation within the plan and as such constitutes an objection to that plan. The submission of this representation is in the context of a separate

representation made by Savills objecting to the assumptions made by the Council in respect of its housing needs assessment and where Savills conclude that the Standard Method should be used for North Norfolk, resulting in a housing requirement for the ELP of 531dpa.

The proposed phasing of the Warham Road site allows for the assimilation of the development on the edge of Wells whilst the accompanying documents demonstrate that whilst inevitably change will occur, the mitigation measures being put in place will reduce impact and ensure the appropriate provision for new housing, open space and employment for the town within this plan period. In the absence of this allocation it is our view that the plan is unsound because it fails to meet the area's actual assessed housing needs and thus not be effective.

As part of discussions in advance of this representation, the Estate has engaged with Homes for Wells who are a Charitable Community Benefit Society set up in 2006 to seek to address issues of housing affordability. Homes for Wells have expressed their support for the provision of intermediate rented property for local working people within the development and in circumstances where an element of new housing would be passed over to the organisation.

In the event that the Local Plan requires amendment to include the proposed allocation it is proposed that Policy HOU1 is amended to account for any proposed new allocation in the event that a new policy is inserted within Chapter 17 of the Local Plan to read as follows:

"Policy XXXX

Land south of Warham Road, Wells-next-the-Sea

Land amounting to approximately 12.4 Ha is proposed to be allocated for residential development of approximately 210 dwellings and 0.75 hectares of land for light industrial commercial workspace.

Planning permission will be granted subject to compliance with the policies of this Plan, and the following site specific requirements:

- 1 Delivery of high quality design that pays careful attention to site layout, building heights and materials in order to minimise the visual impact of the development on the Norfolk Coast AONB and long distance wider landscape views;***
- 2 Provision of 2.2 hectares of high quality public open space including facilities for play & informal recreation;***
- 3 Provision of convenient and safe vehicular access to the site from Warham Road;***
- 4 Retention and enhancement of mature hedgerows and trees around the site boundaries including provision of new landscaping along site boundaries;***
- 5 Submission, approval and implementation of a Surface Water Management Plan ensuring that there is no adverse effects on European sites and greenfield run off rates are not increased;***
- 6 Submission, approval and implementation of a Foul Water Drainage Strategy including details of any off-site mains water reinforcement, enhancements and setting out how additional foul flows will be accommodated within the foul sewerage network;***
- 7 Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS)"***

In the circumstances where only a Phase 1 development was considered acceptable then the policy should be reworded accordingly to read :

"Land amounting to approximately 8.7 Ha is proposed to be allocated for residential development of approximately 100-130 dwellings and 0.75 hectares of land for light industrial commercial workspace."

Modifications requested

SEE ATTACHED FILE

Land south of Warham Road, Wells-next-the-Sea – object to policy HOU1

Savills (UK) Ltd is instructed by The Holkham Estate to make the necessary and relevant representations to the Regulation 19 version of the Local Plan for North Norfolk. As a major landowner within the District, it is important to engage with the Development Plan process and as such, the representations are submitted to ensure that the Plan

is positively prepared, justified, effective and consistent with National Policy within the NPPF.

This representation constitutes an objection to the Regulation 19 version of the Local Plan given that Policy HOU1 "Delivering Sufficient Homes" fails to meet the actual housing needs of the area and this is not effective.

In such circumstances, it is our client's view that further land should be allocated for residential development over and above the two proposed allocations in the Plan for Wells-next-the-Sea (Sites W07/1 and W01/1). Both of these proposed allocations are the subject of separate representations by the Estate .

A separate representation has been made by Savills UK Limited to the Council concerning Policy HOU1 in respect of the proposed housing requirement where the authority is advocating a departure from use of the Standard Method, as set out in national policy and guidance, arguing there are exceptional circumstances which justify an alternative approach. We do not consider there are exceptional circumstances that justify a departure from the Standard Method. The Standard Method should be used for North Norfolk, resulting in a housing requirement for the emerging Local Plan of 531dpa. The clear implications of this, in the event that the Inspector accepts this position, is the need for the Council to be including more allocations within its Plan.

It is considered that the land at Warham Road at Wells next the Sea, the subject of this representation, can contribute to such a housing requirement. The plan as it currently stands is not sound on the basis that it has not been positively prepared, is not justified and not consistent with national policy and is thus not effective .

It is requested that the Local Plan is amended (both Policy HOU1 and the Wells next the Sea Chapter) to include the allocation of a parcel of land off Warham Road in Wells-next-the-Sea for a largely residential development. The 12.4 hectare site consists of two agricultural fields surrounding New Farm on the south side of Warham Road, close to the junction with Stiffkey Road. The farm is in different ownership and does not form part of the proposed site for allocation.

An existing track runs from Warham Road down the west side of the farm, leading to two light industrial units and an existing Victorian water tower which occupies the crest of a small hill. The lane is a public right of way (PROW) and this will be maintained as a key feature of the new development. From the crest of the hill the footpath drops down the slope connecting out into a series of public paths in the landscape to the south of the site.

The east side of the site is defined by a mature field hedge. To the north, the site is bounded by dense mature planting along a disused railway cutting, around New Farm, and along the Warham Road frontage. The west side of the site is an open field which drops down the hill to meet the large playing fields behind the school on Market Lane.

A Proposed Development Strategy document is submitted in support of this representation showing the site of some 12.4 hectares proposing a two phased development comprising some 100-130 homes within the first phase and some 60-80 homes in the second phase of development together with some light industrial commercial workspace. This is enclosed at **Appendix 1**. All of the land being promoted lies within the ownership of the Holkham Estate.

The Proposed Development Strategy has been prepared by the Estate to support the case for a new allocation. The document provides a context for the document in terms of the emerging Local Plan (currently at Submission stage) and acknowledges that the proposed phased manner of the development provides the opportunity for an Inspector and the Council to consider whether one or more phases of development should come forward with the plan period up to 2036.

The document identifies the landscape and visual constraints of the site and assesses site access issues from Warham Road. It then sets out a broad development strategy by way of a general layout diagram together with a concept masterplan and then addresses the potential of a two phase development .

Site Assessment

It is acknowledged that a larger site was previously submitted for consideration as part of the Call for Sites stage of the Local Plan Review and which referred to as site W11 .

The Housing and Economic Land Availability Assessment (HELAA) (June 2017) Appendix 2 assessed the site (reference H0288) - the

site was larger in 2017 since it also included an area of land further to the east. Within the HELAA assessment the site scored positively (green) in respect of the following matters:

- The site is located off the Warham Road and could provide suitable access.
- The site is within 2,000m to a school and employment, and 1,200m away from a facility found in Wells-next-the-Sea.
- The site is located in Flood Zone 1, with a very small part of the site at risk of surface water flooding.
- For developments of greater than 10 properties it is assumed that some enhancement to capacity may be required.
- The site is noted to be greenfield site which consists of grassland with some boundary hedges. No known impact on designated site, protected species or ecological network.
- The site is compatible with existing neighbouring uses.
- The site is not in close proximity to any historic heritage assets or environment.
- The site is not located in the proximity of a heritage townscape.
- The site would not result in the loss of any open space.

In terms of Amber scoring, the suitability assessment noted

- The site is located within the Area of Outstanding Natural Beauty which has richly diverse and distinctive landscape. Development in this location should be sensitive to the wide skylscapes, seascaapes and dark night skies and should protect the quality and character of Wells.
- In terms of landscape the site is located in an area designated as 'undeveloped coast'.
- In terms of contamination and ground stability the site is acknowledged to be mostly greenfield site but the mast to the rear of the may be contaminated and could affect development potential in terms of utilities infrastructure.

The Council scored the site negatively (red) in respect of the following criteria:

- Impact upon the local road network is considered to be unsuitable either in terms of road or junction capacity, or lack of footpath provision.
- Based on current evidence, the site is near to a settlement but the local road network is considered to be unsuitable

Both of these matters are addressed below within this representation

At that time the Council considered that the site was not suitable for development and by way of the HELAA sustainability comments stated that:

"The site is well related to Wells-Next-The-Sea, has access to facilities and utilities. The site is in FZ1. The site is in a moderate to high sensitive landscape within the ANOB, development in this location should be sensitive to the wide skylscapes, and dark night skies and any development proposals should protect the quality and character of Wells-Next-the-Sea. Undulating site rising to the south with mature trees along roadside boundary. Based on current evidence, the site is considered to be unsuitable as the local road network is considered to be unsuitable either in terms of road or junction capacity" (page 970 of HELAA Appendix 2)

The Council's assessment of the site as stated within its recently published Sustainability Appraisal (January 2022) at page 126, states:

"The site is remote and detached from the town and services. It would be a development in open countryside and could have an adverse impact on the landscape and the Area of Outstanding Natural Beauty. Highways access and the local network are considered to be unsuitable. The site is not considered to be suitable for development. Furthermore, the preferred sites can deliver sufficient housing for Wells."

This summary is difficult to reconcile with the summary of the findings of the HELAA when it comes to the assessment of the site and its relationship to Wells. The HELAA says it is well related and the Sustainability Appraisal says it is remote and detached. It is requested that the Inspector assess this matter for themselves given the competing views. The Estate considers that the site is well related having regard to its location on the edge of the settlement boundary in a location in our view which is the only suitable additional area for new development over and above the two allocations within the Plan having regard to topography, character and flood risk

In terms of the aspects which the Council raises by way of concern, we would make the following comments

Local accessibility and the road network

Warham Road is a single carriageway road with a carriageway width of approximately 6.1 metres. It is subject to a 30mph speed limit to the residential edge of the town and thereafter is subject to the national speed limit.

Approximately 150m northwest of the site boundary Warham Road connects with the A149 via a simple priority controlled junction.

The A149 is one of the two main roads for local and regional traffic in North Norfolk, the other being the A148. The A148 and the A149 link at King's Lynn and Cromer with the A149 following the coast between these two settlements and the A148 offering a more direct, cross district route. Accordingly the A148 and the A149 are important links in terms of traffic movements at both a local and regional level, as the wider road network can be accessed beyond Kings Lynn and Cromer.

To the west of the junction between Warham Road and the A149 is a simple priority junction where the A149 meets the B1105, which provides a route south from the town to the A148.

Regarding pedestrian and cycle accessibility, the footway provision along Warham Road consists of a single footway that is approximately 2m wide along the northern side of the carriageway. Prior to the junction between the A149 and Warham Road the footway switches from the northern side of the carriageway to the southern side with a very small section of on carriageway pedestrian facility. From the junction with the A149 there is a wider pedestrian network that links the site with the facilities and services provided within the town, including a series of controlled and uncontrolled crossing points at key locations.

The nearest bus stops to the site are located on the A149 between Warham Road and Polka Road. The bus stops provide for both eastbound and westbound bus journeys and are designated by a bus stop flag.

The most local railway stations for Wells-next-the-Sea are Sheringham station (approximately 17 miles) and Kings Lynn station (approximately 28 miles). Sheringham station has a frequent train service to Norwich and Kings Lynn station offers a regular train service to Ely, Cambridge and London.

On more site specific matters, Create Highway Engineers were instructed by Holkham Estate to assess vehicular access to the site and have concluded that an appropriate junction can be designed to allow for a suitable access onto Warham Road . This is in the form of a T junction with a carriageway width of 5.5 metres and of 43m x 2.4m x 43m visibility splays. This is capable of accommodating up to 150 dwellings. This new access point is also complemented by the provision of a new emergency access point to the east where it is provided with droppable bollards or similar.

In addition to this new junction to Warham Road, the engineers have assessed the need or otherwise to make necessary highways improvements to the junction at Warham Road and the A149. The drawing contained within the enclosed Proposed Development Strategy document (see Appendix 1) at page (shows these improvements and include the reduction in road width to improve visibility and the provision of a new zebra crossing.

It is considered that these improvements address the Council's comments about the unsuitability of the road network

Landscape Impact

It is acknowledged that the site falls to be considered within the Area of Outstanding Natural Beauty and which is a designation that covers the whole of Wells Next the Sea. Consequently any development that occurs within the town or on the edge of town falls within such a designation. Given that two allocations have been identified with the AONB it is clear that there is no in built objection *per se* to development within the AONB.

Clearly in circumstances where there is a significant impact and the benefits of the development do not outweigh the harm caused, then that will be an issue to be assessed but it is our view that the scale of development proposed , the local character of the site and its context together with the need for further housing numbers in Wells , it is considered that development in the manner suggested is appropriate.

In support of the development proposal as set out with the Proposed Development Strategy document (see Appendix 1), The Landscape Partnership were instructed by the Holkham Estate to prepare a Landscape and Visual Statement to provide a high-level review of landscape (site features and landscape character) and visual receptors

that might be affected by the proposed residential development at the site, and sets out ways that these effects could be negated or mitigated. (This is enclosed at **Appendix 2**)

In order to undertake the preliminary landscape and visual appraisal the following work stages were undertaken:

- Desktop study to identify an indicative zone of visual influence, any local statutory and non-statutory landscape-related designations, local public rights of way, and existing landscape character assessments covering the site and its vicinity.
- Field study to verify local landscape characteristics; provide commentary on the condition, sensitivity and capacity of the local landscape character to accommodate change of the type and scale proposed; appraise the contribution of any landscape features within the site that might be lost; identify and provide commentary on the sensitivity of key visual receptors.
- Identification of any parcels of land within the site that might have the capacity, in landscape terms, to accommodate residential development, to help inform the emerging masterplan.
- Identification of any broad mitigation measures that may be required if the proposed development is to be considered acceptable. These were summarised in a Landscape Strategy diagram which formed part of the brief to the architect for development the illustrative master plan.

The Landscape Strategy Diagram sets out mitigation measures that will operate in the near, mid-range views of the site, as follows:

- No development will take place around water-tower at the crest of the hill or on its south-facing slope. This area will be developed and retained as a public open space for the new development and wider town residents and visitors, comprising species-rich meadow planting for enhanced biodiversity value over existing use
- Development will be limited to the west side of the existing field hedge running north-south to the east of the water tower, to limit visual impact on glimpsed views from Warham Road in the approach to the town. The existing hedge is to be retained and enhanced by a 10m screen-planting zone, to mask the eastern flank of the proposed development.
- New 20m screen planting belts will be created to the west and south-west margins of site, to limit view of the proposed development from the footpaths and more distant road network to the south of the site.

It is acknowledged that the character of the site itself would inevitably change as a result of development however it is the case that the character of the site is somewhat influenced by its proximity to the existing urban edge, which reduces sensitivity compared to other parts of the character. In terms of sensitive features, there will be an impact on the existing trees which line Warham Road whilst retaining the network of hedges within the site. Whilst it is accepted that the proposed development would cause a change in character to the Open Rolling Farmland in the context of the Landscape Character Guidelines, these would be localised and contained given the new development would be associated with the existing urban edge and thus the effect on the character area would be limited. This is especially the case where mitigation planting would also help to integrate development within the landscape.

Regarding the views from the Wells/ Holkham Coastal Marshes (OCM6) as defined in the Landscape Character Guidelines for the AONB, views towards the site from this area would be limited although the new development will be visible from certain very distant points. Development on the north facing slope between Warham Road and the water tower will be just visible in these very distant views. Planting within the development will soften its profile over time, and a new block of woodland between this part of the site and the water tower will eventually provide a rear 'backdrop' screen, so that the skyline silhouette will be of tree-tops rather than roofs.

Having regard to the above, it is our view that the proposed development is capable of being accommodated within the landscape having regard to the site's relationship to the settlement and the landscape within which it sits together with the plan and form of development and the mitigating measures being put forward.

Ecological Impact

A Preliminary Ecological Appraisal (PEA) was undertaken as it relates to the site and supports this representation. The appraisal included a habitat survey, protected species scoping survey and desktop study of protected and notable sites and species in the area. A site visit was

undertaken on 17 March 2021. Following this appraisal, bat activity surveys were conducted between April and October 2021. This Ecology Report is enclosed at **Appendix 3**.

The Appraisal has concluded that the site contains habitats typical of the surrounding agricultural land use with much of the area being dominated by arable fields and modified grassland which are generally considered to be of low conservation value. However, these arable and grassland fields are important for key species, such as farmland birds and bats.

The key ecological factors for consideration at the site are:

- Potential impacts on Habitat Sites (i.e., former European designated/Natura 2000 sites);
- Potential presence of ecologically valuable hedgerows;
- Potential presence of great crested newts;
- Potential presence of reptiles;
- Potential impacts on protected bird species and bird species of conservation concern;
- Potential presence of roosting bats;
- Confirmed presence of commuting and foraging bats.

Further survey effort is required for a number of species groups to establish the full extent of key protected and notable species at the Site. The one species group that may have a significant on the available development footprint are bats and as such surveys have been conducted in 2021. The surveys identify the site as having important features for this species group, including the nationally rare and Norfolk Priority Species barbastelle. As recommended in the PEA, the illustrative masterplan includes dark buffer zones along the former railway cutting on the north flank of the site, down the west side of New Farm, adjacent to the retained existing track and hedges, and along the site entrance on Warham Road.

Additional survey effort should incorporate great crested environmental DNA survey, reptile survey, breeding and wintering bird surveys and a badger survey. Many of these surveys can only be completed at specific times of year.

A key aspect of the assessment will be identifying any potential impacts on the designated sites of international importance. The assessment will need to take into account direct impacts, such as potential loss of foraging and roosting habitats for birds, but also indirect impacts, such as increased disturbance resulting from higher visitor numbers in the coastal areas.

In summary, the Site has ecological features which must be recognised in the development process. However, such features are not unusual within farmland habitats, and providing suitable mitigation strategies can be established, they should not preclude future development. We would confirm that MKA Ecology who undertook the PEA have worked closely with the project team in producing the proposed Development Strategy document.

In order to ensure that the best opportunities for ecological mitigation and enhancing are achieved at the site it is recommended that in the event of an allocation, ecological input is made available throughout the master planning stages and to apply the Biodiversity Net Gain methodology at an early stage. Opportunities are available for enhancing the conservation value of the site and to deliver overall gains in biodiversity.

Summary

This site is being promoted by the Estate as a new allocation within the plan and as such constitutes an objection to that plan. The submission of this representation is in the context of a separate representation made by Savills objecting to the assumptions made by the Council in respect of its housing needs assessment and where Savills conclude that the Standard Method should be used for North Norfolk, resulting in a housing requirement for the ELP of 531 dpa.

The proposed phasing of the Warham Road site allows for the assimilation of the development on the edge of Wells whilst the accompanying documents demonstrate that whilst inevitably change will occur, the mitigation measures being put in place will reduce impact and ensure the appropriate provision for new housing, open space and employment for the town within this plan period. In the absence of this allocation it is our view that the plan is unsound because it fails to meet the area's actual assessed housing needs and thus not be effective.

As part of discussions in advance of this representation, the Estate has engaged with Homes for Wells who are a Charitable Community Benefit Society set up in 2006 to seek to address issues of housing

	<p>affordability. Homes for Wells have expressed their support for the provision of intermediate rented property for local working people within the development and in circumstances where an element of new housing would be passed over to the organisation.</p> <p>In the event that the Local Plan requires amendment to include the proposed allocation it is proposed that Policy HOU1 is amended to account for any proposed new allocation in the event that a new policy is inserted within Chapter 17 of the Local Plan to read as follows:</p> <p>“Policy XXXX</p> <p>Land south of Warham Road, Wells-next-the-Sea</p> <p>Land amounting to approximately 12.4 Ha is proposed to be allocated for residential development of approximately 210 dwellings and 0.75 hectares of land for light industrial commercial workspace.</p> <p>Planning permission will be granted subject to compliance with the policies of this Plan, and the following site specific requirements:</p> <ol style="list-style-type: none"> 1 Delivery of high quality design that pays careful attention to site layout, building heights and materials in order to minimise the visual impact of the development on the Norfolk Coast AONB and long distance wider landscape views; 2 Provision of 2.2 hectares of high quality public open space including facilities for play & informal recreation; 3 Provision of convenient and safe vehicular access to the site from Warham Road; 4 Retention and enhancement of mature hedgerows and trees around the site boundaries including provision of new landscaping along site boundaries; 5 Submission, approval and implementation of a Surface Water Management Plan ensuring that there is no adverse effects on European sites and greenfield run off rates are not increased; 6 Submission, approval and implementation of a Foul Water Drainage Strategy including details of any off-site mains water reinforcement, enhancements and setting out how additional foul flows will be accommodated within the foul sewerage network; 7 Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS)” <p>In the circumstances where only a Phase 1 development was considered acceptable then the policy should be reworded accordingly to read :</p> <p>“Land amounting to approximately 8.7 Ha is proposed to be allocated for residential development of approximately 100-130 dwellings and 0.75 hectares of land for light industrial commercial workspace.”</p>
<p>Appear at examination hearing session(s)?</p> <p>* No, I do not wish to participate in examination hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>Justification for appearing at hearing</p>	<p>To seek detailed examination of the Councils approach to Policy HOU1 in the light of housing needs and the need in the circumstances to consider further allocations such as land at Warham Road , Wells next the Sea</p>
<p>Attachment(s)</p>	<p>Appendix 1 - Proposed Dev Strategy.pdf (2) Appendix 2 - Landscape Report_compiled.pdf (1) Appendix 3 - Ecology Report.pdf Appendix 1 - Proposed Dev Strategy.pdf (3) Appendix 2 - Landscape Report_compiled.pdf (2) Appendix 3 - Ecology Report.pdf (1)</p>
<p>Consultation Point Title</p>	<p>Delivering Sufficient Homes</p>
<p>Consultation Point Number</p>	<p>Policy HOU 1</p>
<p>Section of the Plan</p>	<p>Policy HOU 1 Delivering Sufficient Homes</p>
<p>ID</p>	<p>LPS539</p>
<p>Response Date</p>	<p>07/03/2022 17:00:00</p>
<p>Name</p>	<p>Mr</p>

	Julian Wells
Organisation	FW Properties Ltd
Agent Name	Mr Alastair Curran
Agent Organisation	Planning Places Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared
Explanation	<p>The local plan, based off the proposed housing allocations, is not considered to be positively prepared and is therefore not sound. The plan proposes 12,096 new homes, but this target is considered unachievable.</p> <p>The plan relies upon windfall developments to meet 15.6% of the housing provision which equates to 1890 dwellings. This equates to the equivalent level of development as proposed in a Large Growth Town. Although North Norfolk has seen regular windfall developments since 2016, (averaging approximately 135dpa[1]) this is not considered to be a reliable source of housing. The proposed provision of windfall development is 135dpa and provides no safety net for under delivery.</p> <p>Brownfield land and small spaces in settlements are becoming rarer, as most of these sites, such as in Hoveton, have been built out. Furthermore, the proposed local plan includes tighter controls regarding the loss of employment land. Therefore, finding regular brownfield land within the settlement is unlikely to be a sustainable long-term practice. As such, it is envisaged that this level of windfall provision will not be sustained.</p> <p>Equally, windfall sites, due to various site constraints, typically result in substandard accommodation, such as flats with no private outdoor space, or smaller units that do not have good levels of natural light in comparison to larger, planned developments.</p> <p>The heavy reliance on windfall to secure significant housing delivery is therefore considered to be both unjustified and ineffective. Instead, existing allocations should be re-evaluated to see how they can deliver either more dwellings, such as allocation HOV1/B though extending the site boundary and reinstating the original plan to deliver 150 dwellings on the site.</p> <p>[1] Taken from the annual monitoring reports from 2016 to 2019.</p>
Modifications requested	It is considered the best option would be for existing allocations should be re-evaluated to see how they can potentially deliver either more dwellings, such as allocation HOV1/B though extending the site boundary and reinstating the original plan to deliver 150 dwellings on the site.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	It would be beneficial to speak, regarding the housing need target and reliance on windfall development across the district, and the historic delivery the Council are relying upon.
Attachment(s)	HOVET-IWD-XX-XX-DR-A-1010 - Proposed Site Layout Plan - P03.pdf (1)
Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	Policy HOU 1

Section of the Plan	Policy HOU 1 Delivering Sufficient Homes
ID	LPS541
Response Date	07/03/2022 17:00:00
Name	Mr Julian Wells
Organisation	FW Properties Ltd
Agent Name	Mr Alastair Curran
Agent Organisation	Planning Places Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<p>Policy HOU1 is considered to be unjustified and ineffective regarding the provision of elderly accommodation. The draft Local Plan fails to support sufficient delivery of elderly accommodation, in an even and dispersed strategy across the district. Only certain settlements are selected for elderly accommodation, with large areas of the district excluded, partially due to the rural nature of the south and west. This would mean that certain localities would see older residents having to relocate in later life, resulting in unsustainable travel for their respective friends and family having to visit care facilities.</p> <p>Additionally, the table states that dedicated elderly accommodation shall be provided at a ratio of 1.5:1 whereas in Hoveton, for example, the allocation is suggested at delivering 40 elderly accommodation units and 120 dwellings (a ration of 3:1). It should be highlighted that the allocation policy states a delivery of 60 units (a ration of 2:1). The ratio is even worse on other sites though, as per the table in policy HOU1. The existing site allocations do not equate to the necessary ratios the policy requires, which already proposes an unjustified and ineffective strategy for securing the necessary accommodation spaces for elderly people.</p>
Modifications requested	It is considered that the provision of elderly care facilities across the district needs a revision, and a greater emphasis placed upon delivery elderly care facilities. This could be resolved through either more allocations, or preferably, increasing the allocated sustainable site boundaries (such as HV01/B) to be able to accommodate more spaces.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	It would be beneficial to speak about the strategy for securing elderly care, and how larger allocations and windfall developments could realistically deliver elderly care units.
Attachment(s)	HOVET-IWD-XX-XX-DR-A-1010 - Proposed Site Layout Plan - P03.pdf (1)
Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	Policy HOU 1
Section of the Plan	Policy HOU 1 Delivering Sufficient Homes
ID	LPS538
Response Date	07/03/2022 17:00:00

Name	Mr Julian Wells
Organisation	FW Properties Ltd
Agent Name	Mr Alastair Curran
Agent Organisation	Planning Places Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared It is not effective; It is not justified
Explanation	<p>The Local Plan has not been positively prepared and is therefore unsound. It is considered that the use of the 2014 population statistics should be applicable in line with national guidance. Planning Practice Guidance, ID 2a-005-20190220 states:</p> <p><i>The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes.</i></p> <p>The basis for the Council's use of the 2016 statistics is that these show that between 2014 and 2016 the population did not grow as much as expected. However, taking this into consideration, the 2016 predictions did not anticipate the recent Pandemic and the substantial consequences of internal migration. Paragraph 1.47 of the North Norfolk</p> <p>Local Housing Needs Assessment 2019 states that the 2016 household projections are based upon "changes in migration assumptions and mortality rates."</p> <p>The recent rise in North Norfolk's residual population over the last two years has not been taken into consideration regarding housing need, or neighbouring authorities needs. Due to the flexibility of home working and a national shift in priorities for a work/life balance, the population of North Norfolk has expanded during the pandemic and is expected to continue to grow. As such, the housing needs evidence base, which was compiled in 2019 is over 2 years out-of-date, and these two years have seen unprecedented changes to population demographics.</p> <p>Importantly, it is suggested that there is an increased need for homes in North Norfolk than what has been planned for. Conversely, between the Regulation 18 draft and the Regulation 19 draft, the Local Plan has removed 147 housing allocations. As such, it is considered that the plan is ineffective, unjustified, and not positively prepared.</p> <p>To remedy this, it is considered that these additional 147 houses should be reinstated, and further works undertaken to either ascertain a more realistic and evidence-based need, or that additional allocation or larger allocations be considered. For example, reinstating the Hoveton allocation HV01/B to 150 units would help in restoring the original planned housing delivery, but there is scope if necessary to extend the site further, should a more significant shortfall of housing be identified. This is required to make the plan sound.</p>
Modifications requested	<p>The 2014 housing figures should be utilised for accounting the housing need, or a new study commissioned which takes into the recent migration to North Norfolk following the pandemic be commissioned to ensure the correct figures are being used.</p> <p>It is considered that to meet this additional need, (or the proposed need) that more housing will be required, and as such, as a minimum, the original quantum of development should be reinstated for allocation HV01/B.</p>

Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	We can help explore the issues regarding the Council's housing calculations and how the 5-year supply and housing need have been calculated, alongside the reasoning of the changing circumstances of North Norfolk's residual population. Additionally, we can assist in finding solutions to meet any increased housing need.
Attachment(s)	HOVET-IWD-XX-XX-DR-A-1010 - Proposed Site Layout Plan - P03.pdf (1)
Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	Policy HOU 1
Section of the Plan	Policy HOU 1 Delivering Sufficient Homes
ID	LPS540
Response Date	07/03/2022 17:00:00
Name	Mr Julian Wells
Organisation	FW Properties Ltd
Agent Name	Mr Alastair Curran
Agent Organisation	Planning Places Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<p>The draft Regulation 19 Local Plan has seen housing allocations reduced across the district considering recent changes to national policies to enable the better integration of green infrastructure (tree lined streets) and the new National Model Design Guide. This approach is considered ineffective, and unjustified as it results in less development in highly sustainable locations where the Council has already undertaken work and ascertained its need.</p> <p>Due to the reduction in dwellings proposed, such as at site HOV1/B, North Norfolk are now proposing 147 less dwellings in total than at Regulation 18, instead relying more on windfall to take this additional pre-determined need. This is at odds with the purpose of the 'plan led planning system.' Instead, existing sites should be expanded, where this is both possible and feasible to do so, such as in Hoveton in HOV1/B, to ensure sites deliver the necessary statutory requirements of well-designed places, but also that sustainable settlements, such can grow as planned.</p>
Modifications requested	It is considered that sites return to the original planned development at Regulation 18, and where possible these sustainable locations be expanded geographically to accommodative any legislative requirements.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	It would be beneficial to speak, as acting on behalf of the landowner and developer for HV01/B, we can assist the inspector in better

	understanding the allocation, the local situation/politics, as well as what is deliverable, in terms of quantum of development and timescales. Additionally, we are also experienced in the delivery of large sites in light of the recent planning reforms and the reality of these changes upon the delivery of housing sites.
Attachment(s)	HOVET-IWD-XX-XX-DR-A-1010 - Proposed Site Layout Plan - P03.pdf (1)
Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	Policy HOU 1
Section of the Plan	Policy HOU 1 Delivering Sufficient Homes
ID	LPS535
Response Date	07/03/2022 17:00:00
Name	Mr Rob Ravilius
Organisation	Ilex Homes
Agent Name	Mr Alastair Curran
Agent Organisation	Planning Places Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	<p>Policy HOU1 is unjustified, due to the proposed level of growth planned for Holt not being sufficient.</p> <p>Holt is a substantial town within North Norfolk, although is currently classified as a Small Growth Town. With the recent fire at Budgens, Holt lost its only supermarket, which portrays the limited-service provision available. As acknowledged in paragraph 8.4.4 of the proposed local plan:</p> <p><i>Holt, Sheringham, Hoveton, Stalham and Wells-next-the-Sea serve small catchments and to varying degrees have developed a particular niche market role. They are partly dependent upon the seasonal influx of tourists and retain their locally distinctive small shop character.</i></p> <p>Although the plan acknowledges that large scale development here could have a disproportionately negative impact upon the character of Holt, it does not credit the need and benefits of more regular smaller scale development which would contribute to the character and unique grain of development Holt has benefitted from historically.</p> <p>Although the neighbouring towns of Cromer, Sheringham, and Fakenham have service provision that temporarily could assist, Holt requires more essential services locally to remain a sustainable settlement capable of expansion. Although Holt is an affluent area, local patrons/residents are necessary to attract more local services and protect existing facilities, as reliance upon tourism is unpredictable, especially in light of the pandemic.</p> <p>The nominal allocation of only 207 units is not considered to be sufficient for the next 14 years, for such a substantial settlement, without allowing for greater windfall development opportunities. Instead, allowing development that is either adjacent to, or well connected to the settlement would aid in securing the necessary economic and social growth to sustain the existing town whilst facilitating appropriate growth. This would therefore result in a more effective and justified strategy to see the necessary housing delivery for Holt.</p>

Modifications requested	It is considered that the current plan, in terms of protected long-term growth for Holt is unsound. Instead, there should be further allocations, of a smaller scale, as per paragraph 8.4.4 of the preamble, or HOU1 should allow for future windfall schemes to come forward either adjacent to or within close proximity of Holt.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	It would be beneficial to speak about the strategy for growth for Holt, and other small and large growth towns. Additionally, we would like to verbalise potential solutions in order to help facilitate growth and potentially new allocations or windfall opportunities.
Attachment(s)	
Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	Policy HOU 1
Section of the Plan	Policy HOU 1 Delivering Sufficient Homes
ID	LPS491
Response Date	07/03/2022 18:26:14
Name	
Organisation	Sutherland Homes
Agent Name	Mr Mark Singer
Agent Organisation	Barton Willmore
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	SEE ATTACHED FILE
Modifications requested	SEE ATTACHED FILE
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	Please see representations attached and sent via email
Attachment(s)	220307 Representations to NNDC Draft Local Plan Proposed Submission Version (C16).pdf (5)
Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	Policy HOU 1
Section of the Plan	Policy HOU 1 Delivering Sufficient Homes
ID	LPS590
Response Date	12/02/2022 12:06:00
Name	Mr Graham Martin
Organisation	
Agent Name	

Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>Apart from affordable homes there is no housing shortage in North Norfolk so it is not clear why the developing North Norfolk Local Plan (NNLP) has earmarked twenty eight towns and villages for at least 9600 homes by 2036.</p> <p>There seems to be little attempt in the NNLP to inform residents of the adverse implications of development demands.</p> <p>Many of the twenty eight towns and villages are on greenfield ,including arable land and amenity areas and when covered with new houses will be lost to food production and adversely affect biodiversity in the environment.</p> <p>Sea flooding in some coastal areas is well known but fluvial, surface and groundwater can cause flooding. Have such areas been identified in North Norfolk? Climate change will exacerbate such flooding and possibly make some development proposals unsustainable.</p> <p>Much of the massive demand for housing seems to be developer led to encourage people to move to North Norfolk, where houses are generally cheaper because they are often built on greenfield sites. Research by Transport for New Homes has found that such greenfield housing developments are adding thousands of new car journeys to our roads, increasing congestion, carbon emissions and air pollution with associated health issues. These houses will generate large amounts of traffic increasing air pollution with associated health issues.</p> <p>The proposals in the NNLP would generate large amounts of traffic increasing air pollution with associated health issues. Each new house will generate about seven traffic movements a day so the planned 10,000 houses will create some 70,000 new traffic movements.</p> <p>Surely this inward movement from elsewhere should not be encouraged where it adversely affects the quality of life and wellbeing of residents? Arguments have been put forward that the housing situation requires market rate sales to cross-fund affordable homes to deliver affordables in significant numbers. However this is because big companies with their deep pockets are a house mafia controlling the purchase of land and when and where houses are built. Big developments mean bigger profits so the house mafia makes applications for big developments.</p> <p>Is the NNLP looking at Housing associations? Housing associations build a quarter of England's new homes, including almost all new social and affordable homes. Brandon Lewis, Minister of State for Housing and Planning, announced additional measures to free up the burdensome planning system to support small scale developers and self-builders</p> <p>There is little evidence that the houses planned in the NNLP are demanded by local communities. On the contrary, letters in the press show objections and concern about the scale of development and lack of affordable homes.</p> <p>It is appreciated that government demands put pressure on local planners. Hopefully local planners will continue to resist such demands.</p>
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	Policy HOU 1
Section of the Plan	Policy HOU 1 Delivering Sufficient Homes
ID	LPS618
Response Date	07/03/2022 15:06:00
Name	Alicia Hull & Peter Crouch
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>Given the number of houses already built and those with planning permission, the council should concentrate on affordable and secure rented property – council housing is the best way forward, both for residents and for the climate.</p> <p>The overwhelming need for affordable housing, is crucially not the so called affordable housing to buy, which in many cases is far from affordable and traps people into mortgage problems, but the lack of affordable rented housing providing long term security. Providing council housing is the only way to control this. I was told by a councillor that this is now possible. Investment now would also bring rent income in the future.</p> <p>With the council in control it could set the highest standards possible and not wait for central government rules. It's involvement with Green Build will be helpful. It can also decide on the number of affordable rented houses needed in the light of local situations. It would no longer lose arguments with developers who find reasons why they could not afford to build the required number of 'affordable' houses.</p> <p>It will allow far more control in following Policy CC 3 'Sustainable Construction, Energy Efficiency & Carbon Reduction'. As it will be able to install good design instead of the far more limited situation of encouraging others to do so. Design which will include the lowest possible embedded carbon as well as low carbon in use.</p> <p>The climate emergency demands that we cut carbon costs NOW. Any building is carbon heavy, so the safest policy would be to stop all new build. Yet the housing need demands some. The safest solution to both these problems is to convert existing buildings no longer required for their current use into housing. As many as possible of the 480 houses needed each year should be from existing buildings. With the uncertainty in the economic brought by Covid19, Brexit and the climate emergency, it is impossible to predict how many businesses, second homes and other buildings will be available for rented accommodation. The requirement should stay that converting buildings is the first option. And this priority should allow the strict assignment of numbers of housing to villages, etc, to be more flexible.</p> <p>Economic changes may reduce the proportion of second homes, which needs to be factored into the figures for housing need.</p> <p>Retrofitting buildings to a high standard will be far cheaper than new build and would have the added advantage of bringing lots of local jobs and an increase in skills. All these households then produce rents for the council.</p>
Modifications requested	
Appear at examination hearing session(s)?	

* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	Policy HOU 1
Section of the Plan	Policy HOU 1 Delivering Sufficient Homes
ID	LPS772
Response Date	28/02/2022 16:35:00
Name	Mr Mark Behrendt
Organisation	Home Builders Federation
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	
* Yes	
* No	
Has the duty to cooperate been met?	
* Yes	
* No	
Do you consider the plan to be Sound?	No
* Yes	
* No	
Reason(s) not Sound	It is not justified; It is not consistent with national policy
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	<p>The policy is unsound as it is inconsistent with national policy and unjustified.</p> <p>This policy sets out the Council's aim to deliver 9,600 homes between 2016 and 2036 – an average of 480 dwellings per annum (dpa), some 51 dpa below the minimum required using the standard method. The HBF do not consider the Council to have justified either the annual level of housing needs they plan to deliver, nor the overall level of housing need which is based on an unsound plan period.</p> <p>Housing requirement – use of the 2016-based projections</p> <p>Paragraph 61 of the NPPF establishes that the minimum number of homes to be planned for should be determined by a local housing needs assessment using the standard method set out in PPG – unless exceptional circumstances justify an alternative approach being used. The Council consider there to be the necessary exceptional circumstances required to apply an alternate method and have set out their justification in the North Norfolk Local Housing Needs Assessment 2019 (LHNA). This document sets out that due to problems with the 2014-based household projections and how they relate to population growth in North Norfolk they cannot be relied on as the basis for the standard method. The Council consider the 2016-based projections to be a more accurate assessment of population growth as the migration estimates in these later projections should be seen as a correction to the problems relating to the unattributable population change (UPC) seen in the 2014-based projections.</p> <p>Whilst we recognise that there were issues with regard to UPC in the 2014-based projections we do not consider their impact in relation to the standard method to be so significant as to justify the use of the 2016-based projections and ignores the Government concerns with regard to lower levels of housing delivery being baked into household growth. The Council's position also ignores the relatively small difference between the outcomes of each projection. Between 2021 and 2031 the annual growth in the 2014-based household projections was 403 households compared to 347 households in 2016-based projections a difference of 56 household per annum. This 14% difference in expected household formation is lower than percentage</p>

change between the two projections for 22 other authorities in the East of England. This does not suggest that North Norfolk circumstances are particularly exceptional and the HBF do not consider the use of the 2016-based projections to be justified.

As the Council note in the LHNA the Government are aware that the 2016-based projections, and indeed later iterations of these projections, have in most areas shown that the number of households being created will reduce. However, when faced with the decision as to whether to require the use of the updated household projections the Government have decided to require the use of the 2014-based projections. In fact, this situation has been considered not only with regard to the 2016-based projections but also the 2018-based projection published in 2020.

It is also worth noting that the principal 2018-based projections indicate that household growth in North Norfolk between 2021 and 2031 is expected to be around 430 households per annum which if used in the standard method would result in a minimum housing requirement of 570 dwellings per annum. Whilst the principal projection in the 2018-based projections is based on only two years of migration data, and as such should be treated with caution, it does indicate that future household growth may not be as low as the Council suggest.

What is evident from the Government's position is that it considers the level of housing growth resulting from the application of the standard method using the 2014-based projections as the level of housing delivery required in order to meet future needs and address the backlog in demand from past under deliver across the country. We therefore do not consider the Council's proposed approach to be justified and that it should apply the standard method using the 2014-based projections. This requires the Council to deliver a minimum of 532 dpa over the plan period.

Housing requirement and the plan period

As set out earlier in these representations the HBF is concerned that the plan period is not consistent with national policy and should be extended to at least 2037/38. However, equally we do not consider it necessary for the plan to look back to 2016/17, five years prior to the period used to assess the minimum housing requirement. The standard method has been developed to take account of past under delivery and as such it is not necessary include any delivery from previous years within the local plan. On this basis we would recommend that housing needs are considered over a new plan period be 2021/22 to 2038/39 which if the standard method is applied would result in a requirement to deliver 9,558 new homes in total.

Housing supply

Between 2016/17 and 2035/36 the Council expects to deliver 10,600 homes. This provides the Council with a buffer of some 526 homes, around 5% more than the Council stated minimum housing needs. However, given that this plan period is inconsistent with national policy the Council will need to identify sufficient supply to meet needs for the period 2036/37 to 2038/39.

Modifications requested

At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF for the following reasons:

- The alternative approach to assessing local housing need is unjustified
- Starting point for windfall allowance in the housing trajectory is unjustified

As set out above the HBF consider that the Council's housing requirement should be 531 dpa as established using the standard method. Over the revised plan period the Council will therefore need to ensure there is sufficient supply to ensure the delivery 9,558 homes. At present supply between 2021/22 and 2035/36 is expected to be 8,170 homes. In order to ensure this level of delivery is secured the Council will need to find supply for a further 1,388 new homes between 2036/37 and 2038/39 as well as an additional buffer to ensure that needs are met in full.

The HBF does not comment on the deliverability or developability of specific sites. However, it will be essential that the Council provides sufficient evidence to support their assumptions and that delivery expectations are reasonable and not overly optimistic. Similarly, the Council will need to provide evidence to support its assumptions with regards to windfall. The Council set out in the housing trajectory that they expect windfall development to account for 135 dpa from 2022/23, delivering a total of 1,890 units over the plan period. However, we are

	<p>concerned that there is considerable overlap between the delivery of existing permissions with the Council only deducting a single year of windfall to ensure there is no double counting. This is insufficient and will not eliminate double counting of permissions in the windfall allowance over the first five years of the local plan. Much of the windfall development seen in the first three years of the local plan will be from existing permissions and as such the Council should exclude windfall from the first three years of the five-year housing land supply. This would push back the inclusion of a windfall allowance to at least 2023/24 in the published housing trajectory. However, the year in which the windfall allowance starts will need to be pushed back as data on extant permissions is updated.</p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	I can also confirm that I wish to participate in the relevant hearing sessions in order to full represent our concerns which reflect the views of discussions with our membership who account of 80% of the market housing built in England and Wales.
Attachment(s)	
Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	Policy HOU 1
Section of the Plan	Policy HOU 1 Delivering Sufficient Homes
ID	LPS748
Response Date	04/03/2022 15:07:00
Name	
Organisation	Glavenhill Strategic Land
Agent Name	Mr Philip Atkinson
Agent Organisation	Lanpro Services
<p>Do you consider the plan to be Legally Compliant? * Yes * No</p>	
<p>Has the duty to cooperate been met? * Yes * No</p>	
<p>Do you consider the plan to be Sound? * Yes * No</p>	No
<p>Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy</p>	
Explanation	<p>My client Glavenhill is promoting lower-grade agricultural land at Badersfield for balanced mixed-use development. Badersfield is identified in Policy SS2 of the emerging Local Plan as a Small Growth Village that in combination with other villages in the District will receive some 7.6% of planned housing growth over the emerging Plan-period. This OBJECTION should be read in conjunction with previous representations submitted by Glavenhill relating to land at Badersfield.</p> <p>Glavenhill consider that Badersfield is a good location for housing and employment growth and supports the strategic aim as outlined in paragraph 8.0.1 of the emerging Local Plan that states “Delivering sustainable growth requires that housing growth is matched with improved employment opportunities close to where people live.”</p> <p>Glavenhill control land to the north and east of the village of Badersfield adjacent and to the north of Scottow Enterprise Park (SEP). Glavenhill has previously promoted this land for a mix of private and affordable housing, elderly and specialist care, new community services and employment uses at various stages in the emerging Local Plan’s evolution. My client is concerned that no new housing or employment growth is proposed to be allocated at Badersfield to support the continued growth and success of the SEP.</p>

	Glavenhill through their previous Local Plan submissions, detailed in their Vision and Delivery Document submitted in June 2019, confirms that the village of Badersfield is a sustainable location for planned housing and employment growth. As explained previously the village benefits from a range of core services including convenience retail and post office, place of worship and a public house as well as major employment at the SEP and HMP Bure. Further services such as high schools, medical and dental practices, sports grounds, libraries and emergency services are also within a short distance.
Modifications requested	Glavenhill is seeking amendments to emerging policies SS1, SS2 and HOU1 in the emerging Local Plan to recognise the potential of Badersfield to deliver new and innovative economic growth enabled by additional new housing provision in this sustainable growth location. My client is also seeking the removal of references to Badersfield being an unsustainable location for new growth within NNDC area in the emerging Local Plan. This is because being the acknowledged third largest employment centre in the District and well served by existing housing and day-to-day facilities this simply cannot be the case that it is unsustainable.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	My clients would like to attend the Examination in Public in due course to discuss their proposal and better explain the emerging Local Plan changes now sought to facilitate the planned development.
Attachment(s)	
Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	Policy HOU 1
Section of the Plan	Policy HOU 1 Delivering Sufficient Homes
ID	LPS758
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Housing 1. Much of North Norfolk relies on the tourism and service sectors. As such, many jobs are reliant on the number of visitors to our area, therefore wages fluctuate enormously throughout the year. 2. Wages in the hospitality and social care sectors are generally under £23,000 per annum on average. Therefore, the model in the Local Plan for affordable housing will not be within their reach. 3. Without genuinely affordable housing in our villages the social fabric will be changed. The absence of families means no village schools. Lack of those of working age reduces the need for and viability of public transport. This also results in a lack of residents to volunteer to

	<p>run village halls or organise social events. This further leaves the elderly trapped in their homes.</p> <p>4. The number of houses proposed is excessive to the number actually needed for North Norfolk. NNDC recognise many of the properties will be purchased by those wishing to retire here or purchase a second home or holiday home. All of these would provide a modest increase in the local economy, but there will not be the workforce needed to service them. There are no proposals for primary residence occupancy, which is critical to the social and economic viability of villages and small towns.</p> <p>5. Holiday homes and second homes leave our coastal areas desolate for much of the year. This impacts on public transport use, use of town and village amenities such as shops, pubs and restaurants. It increases prices of rural services and makes them further out of the reach of those on lower incomes.</p> <p>6. There is nothing in this plan to increase the number of working-age residents in the area. This is necessary to be able to provide for the elderly and to meet the needs of visitors in the District.</p> <p>7. More holiday homes and more second homes will mean more traffic coming to North Norfolk on unsuitable roads. This will have an economic impact caused by traffic delays, and is also likely to result in increased road traffic accidents as people become frustrated by hold-ups and attempt to overtake at unsuitable locations; there are in fact already very few safe overtaking locations.</p> <p>8. The plan is not effective. For example, if 21 new houses are built in Weybourne and then they become second homes or holiday homes, this does not achieve the aim of meeting local need; the displacement argument that new houses will prevent existing homes from becoming holiday homes does not hold water. There needs to be a shift from the construction of houses to the creation of homes for local people.</p>
Modifications requested	9. There should be restrictions on primary residences becoming holiday homes. This should at the very least require planning permission, and the effect on the local community should be taken into account when deciding on whether to approve or not.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	Policy HOU 1
Section of the Plan	Policy HOU 1 Delivering Sufficient Homes
ID	LPS804
Response Date	07/03/2022 18:09:00
Name	
Organisation	Turley Planning
Agent Name	Mr Steve Kosky
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy

Explanation

SEE ATTACHED FILE

2.1 Policy HOU 1 sets out that over the Plan period (2016 – 2036) the Council will aim to deliver a minimum of 9,600 new homes and that as part of this total a minimum of 2,000 affordable homes will be provided. Pigeon however does not accept this position, for the following reasons:

2.2 The supporting text to Policy HOU1 opens by stating (our emphasis):

“The purpose of this policy is to set a minimum housing target for the District that ensures that all existing and future housing needs are addressed...”

2.3 At para. 7.1.2 it continues (our emphasis):

“The NPPF aims to boost significantly the supply of homes and ensure that sufficient homes are built to meet likely future needs. To deliver this increase in supply it requires that Plans should ensure that all of the likely future needs for homes is planned for...”

2.4 At para. 7.1.3 it states (our emphasis):

“The first stage of setting a housing target for the Plan is to establish how many new homes are likely to be required. National planning policy refers to this as establishing Objectively Assessed Needs (OAN) and includes a standard national methodology for arriving at this figure...”

2.5 Over the following few paragraphs the text then discusses the Standard Method and the process of arriving at the number of new homes required. At para. 7.1.4 it then states:

*“...Applying the national standard housing needs methodology to the 2016 projections, and using the latest available (2020) affordability ratio for the District, produces a minimum housing requirement for around 480 dwellings per year, or 9,600 new homes in the twenty years covered by the Plan. This Plan sets this figure as the **minimum target** to be provided...”*

2.6 In doing so, the Plan starts to become confused by its misunderstanding of the applicable terminology.

2.7 The NPPF and PPG explain that the Standard Method for identifying Local Housing Need is the ‘starting point’ in identifying the ‘minimum’ housing need. The plan recognises this in the opening statement to para. 7.1.3 and, potentially, in its use and emphasis of the word ‘minimum’ in para 7.1.4. Following this, the NPPF and PPG advise that other matters should be considered in identifying the ‘actual housing need’. The Plan, and supporting evidence base appears to have failed to undertake this step of the process.

2.8 The NPPF and PPG also advise that the Plan should establish, in a strategic policy, the housing ‘requirement’, noting that the identified ‘housing need’ is not the same as the ‘housing requirement’. Again, the Plan and supporting evidence base appears not to have appreciated or undertaken this step of the process.

2.9 Instead the Plan introduces the concept of ‘housing target’, a somewhat antiquated term in plan-making. Whereas a ‘housing requirement’ is a minimum figure against which housing land supply and housing delivery is then tested, all to assist with boosting significantly the actual supply of housing, the phrase ‘housing target’ can often be misconstrued.

2.10 It is thus considered that in order to be effective, Policy HOU1 and the supporting text thereto should clearly justify and set a ‘housing requirement’.

2.11 With regard to the figure that should represent the housing requirement, we disagree with the approach taken by the Council as is set out in the Plan and supporting text. A detailed assessment is contained in a separate report prepared by Savills attached as Appendix 1 to these representations, which concludes (paras. 4.11 and 4.12):

2.12 “There are no exceptional circumstances that justify a departure from the Standard Method and 2014-based SNHPs, and the use of the 2016-based SNHPs instead. The Standard Method should be used for North Norfolk, resulting in an average annual housing need of 531 dpa (a total of 10,620 over the 20-year plan period).

2.13 If one were to apply the latest, 2018-based, SNHPs to the methodology as advocated by the LHNA 2019, this would result in an average annual housing need of 561 dpa (a total of 11,220 over the 20-year plan period).”

2.14 It is thus considered that the ‘housing requirement’ set out in Policy HOU1 should not be 9,600 homes as proposed, but should be at least 10,620 homes.

Housing Supply & the Buffer

2.15 The supporting text to Policy HOU1 also states (para. 7.1.4): *“As a measure to extend choice and flexibility, the Plan includes specific allocations and policies which would enable the delivery of around 12,000 new homes.”*

2.16 Compared to a ‘target’ (i.e. need / requirement) of 9,600 homes, a supply of around 12,000 homes would equate to a sizeable 25% buffer (some 2,400 homes).

2.17 However, if the requirement were increased to 10,620 homes as we suggest it should be, then the buffer would reduce to just over 10% (some 1,020 homes). A buffer of more than 10% is usually viewed as being the absolute minimum necessary to ensure a robust supply of housing.

2.18 Table 5 in Policy HOU1 then sets out the sources of the anticipated supply, totalling some 12,096 homes. The same total of 12,096 homes is arrived at if all of the annual projected delivery figures in the Housing Trajectory (Section 23 of the Plan) are totalled, including the delivery from two sites in North Walsham and Fakenham for years beyond the 2016-2036 plan-period.

2.19 This is recognised in the supporting text to Policy HOU1, which clearly states (paragraph 7.1.10):

“The two largest sites at North Walsham and Fakenham are assessed to take many years to deliver in full with some of the development on both of the larger allocations taking place beyond the period covered by this Plan. ...”

2.20 As such, the Housing Trajectory makes it clear that of the 12,096 dwellings for which provision is being made, only 10,599 dwellings are projected to come forward within the plan period.

2.21 Compared to a ‘target’ of 9,600 homes as proposed in the Plan, a supply of 10,599 homes would equate to a buffer of just 9.4% (999 homes). However, compared to a requirement of 10,620 homes as we suggest it should be, a supply of 10,599 homes would result in a shortfall of 21 homes. In short, if the requirement is, as we suggest it should be, then the Plan does not identify a supply of housing land sufficient to meet the identified need, let alone include any buffer.

2.22 Notably, as demonstrated through the Housing Delivery Test (HDT), housing delivery in North Norfolk has been reducing in recent years, with delivery falling slightly below the HDT requirement for the first time in the latest (2021) set of results, despite two of the three years covered including reductions to the requirement stemming from the Coronavirus pandemic. Part of the reason for this reducing delivery is the failure of large sites to deliver as planned.

2.23 It is thus considered that, against a requirement of 10,620 homes a buffer of at least 10% (i.e. sites sufficient for 11,682 homes) and ideally 20% (i.e. sites sufficient for 12,744 homes) should be identified to ensure a robust supply of housing land.

2.24 This would require the identification of additional sites capable of accommodating between 1,083 and 2,145 homes, although as we set out in our representations to Policies F01/B and NW62/A, in Section 3 below, there is also the likely need to identify sites for a further 920 homes.

Modifications requested

SEE ATTACHED FILE

It is thus considered that in order to be effective, Policy HOU1 and the supporting text thereto should clearly justify and set a ‘housing requirement’.

It is thus considered that the ‘housing requirement’ set out in Policy HOU1 should not be 9,600 homes as proposed, but should be at least 10,620 homes.

It is thus considered that, against a requirement of 10,620 homes a buffer of at least 10% (i.e. sites sufficient for 11,682 homes) and ideally 20% (i.e. sites sufficient for 12,744 homes) should be identified to ensure a robust supply of housing land.

This would require the identification of additional sites capable of accommodating between 1,083 and 2,145 homes, although as we set out in our representations to Policies F01/B and NW62/A, in Section 3, there is also the likely need to identify sites for a further 920 homes.

Appear at examination hearing session(s)?

* **No, I do not wish to participate in examination hearing session(s)**

* **Yes, I wish to participate in hearing session(s)**

Justification for appearing at hearing	
Attachment(s)	Appendix 1 - North Norfolk Assessment of Identified LHN.pdf
Consultation Point Title	Delivering Sufficient Homes
Consultation Point Number	Policy HOU 1
Section of the Plan	Policy SS1, Policy HOU1, Policy NW01/B, Policy NW62/A
ID	LPS83
Response Date	07/03/2022 10:48:33
Name	Mr Paul Harris
Organisation	Broadland District Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	No
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified; It is not consistent with national policy
Explanation	<p>Thank you for consulting Broadland District Council on the Pre-submission version of the North Norfolk Local Plan.</p> <p>Unfortunately Broadland District Council does not believe that it is currently possible to conclude that the plan is sound or legally compliant. In particular, the Council does not consider that it is currently possible to conclude the plan is justified, effective or consistent with National Policy. Also, Broadland District Council cannot see how North Norfolk District Council (N.NRK) have currently complied with the requirements of the duty to co-operate. The Council has explained the reasons for its conclusions on these points below.</p> <p>Justified</p> <p>In order to be justified the plan must be an appropriate strategy, taking account the reasonable alternatives, and based on a proportionate evidence base.</p> <p>Broadland District Council's substantive concern, as expressed in previous representations, is that substantial additional growth in North Walsham could significantly increase the traffic volumes felt on the arterial routes into Norwich, particularly the B1150 and also the B1145/A140 and A1151 and that the Plan should consider and address any potential impacts on these roads.</p> <p>In respect of the proportionate evidence required, Paragraph 31 of the NPPF sets out that "<i>the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals</i>".</p> <p>In addition, Paragraph 110 of the NPPF states that "<i>in assessing sites that may be allocated for development in places, it should be ensured that:</i>" amongst other things, "<i>any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree</i>".</p> <p>From what the Council has been able to establish, the transport evidence that underpins the plan comprises a background paper published to support the First Draft Local Plan Part 1 dated May 2019, a feasibility study into the North Walsham Link Road dated November 2020 and an addendum to that study dated September 2021.</p> <p>In transport terms, accepting that it was produced ahead of Broadland District Council's representations, the 2019 background paper does</p>

not appear to engage to any particular degree with the potential impact of proposed growth on any of the arterial roads about which Broadland is concerned. The 2020 study does not appear to consider wider impacts beyond the built-up area of North Walsham and the key traffic routes into the town in the immediate vicinity of that area.

The 2021 addendum does begin to give consideration to the wider impacts of planned growth at North Walsham. This is a high level review, taking the form of a technical note, which sets out some limited evidence about the impact of the proposed strategic growth at North Walsham on the B1150 at North Walsham. Overall it is predicted that there would be a 28% increase in traffic in the AM peak and 30% in the PM peak. 18% of this increase in traffic in the AM peak and 13% in the PM peak is directly attributed in the note to the growth proposed at North Walsham.

The technical does not appear to include any meaningful assessment of local road conditions on the B1150 in the area of Coltishall, other than a reference to the broad nature of the road and constrained nature of the existing bridge at Coltishall. It is unclear to what extent the transport model used has specifically considered other planned growth in the area at Coltishall e.g. additional employment growth at Scottow Enterprise Park. Also, there appears to be no assessment of recorded accidents within the area, the reason for these accidents and the effect that the identified increase in traffic might have on these.

The summary of the technical note includes no conclusion as to whether, taking account of paragraph 111 of the NPPF, the increased levels of traffic would have the unacceptable impacts on highway safety, or if the residual cumulative impacts on the road network would be severe, or by association a rationale provided for such a conclusion. Neither does there appear to be any assessment of whether mitigation measures are necessary in the Coltishall area as a result of the delivery of planned growth, what any such necessary mitigations comprise or if they are deliverable.

Perhaps significantly, the summary of the technical note sets out that *“the date used for the analysis to assess the impacts of growth in North Walsham on the Coltishall area has its limitations and is unable to quantify these impacts to an adequate level of accuracy”*. Also that *“further, more detailed analysis also needs to be carried out to mitigate the limitations highlighted in this technical note and to obtain a clearer, more robust understanding of the impacts on Coltishall.”*

As far as Broadland District Council has been able to establish no conclusion or rationale that indicates how the evidence base fulfils the requirements of paragraph 110 or 111 of the NPPF or how N.NRK has drawn its conclusions that the plan is justified taking account of the above has been set out elsewhere in the published materials. Ahead of this response Broadland Council requested clarification on the matter of how N.NRK Council had concluded compliance with the requirements of paragraph 111 of the NPPF on 16 January 2022. No response has yet been received.

On this basis: that there does not appear to be any proportionate evidence base on which to make a judgement against paragraphs 110 and 111 of the NPPF; that no clear and justified conclusions on these points appears to be set out in evidence; and, that the conclusions of the technical note itself sets out that it is unable to quantify impacts to an adequate level of accuracy and that further work is required, Broadland District cannot see that it is possible to conclude that the plan is justified based on proportionate evidence at this stage.

Effective

Paragraph 68 of the NPPF requires, amongst other things, that “planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability”. Also, that “Planning policies should identify a supply of: a) specific, deliverable site for years one to five of the plan period, and b) specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15 of the plan.

The glossary of the National Planning Policy Framework identifies that to be deliverable a site should be available now, offer a suitable local for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular, where a site has been allocated in a development plan it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

For a site to be considered developable it should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

North Norfolk's housing trajectory is set out on page 267 of the strategy, this shows the first homes on site NW01/B are expected to be completed in 2024/25 and the first homes on NW62 are expected to be delivered in 2026/27.

The published Local Development Scheme Revised Timetable dated December 2021 sets N.NRK's expectation that the plan will be adopted in 23/24. Therefore, to all intents and purposes both of North Walsham sites are identified as Deliverable sites.

As set out elsewhere in this response, Broadland District Council has been unable to establish that there is a proportionate assessment of the impacts of the development on the B1150 in the Coltishall area. Therefore it does not appear that it is possible to conclude whether there are any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety or whether these can be cost effectively mitigated to an acceptable degree in accordance with the requirements of paragraph 110 of the NPPF.

Therefore, the Council does see how it is currently possible to conclude that there is either a realistic or reasonable prospect that the site is suitable and achievable. As such Broadland does not see that it is currently possible to conclude the plan is effective.

This is particularly important in the context of North Walsham as it alone provides for 25% of the overall growth within the plan period and 45% of new allocations. Given the substantial reliance of the plan on the new allocations at North Walsham, it is essential that there is a proportionate evidence that leads to the justifiable conclusion that the impacts of growth can be effectively mitigated.

The Council does note that provision has been made for abnormal costs within the viability assessment in relation to the North Walsham sites. However, the individual assessment sheet referred to in the assessment do not appear to have been published and therefore the Council has been unable to establish the extent to which these might reasonably pay for necessary off-site improvements in the Coltishall area. As the viability assessment itself recognises, the viability of the proposed development at North Walsham is dependent on the landowner accepting below benchmark land values. Whilst the Council does not dispute this conclusion it does show that the deliverability of the site is more finely balanced than other sites and as such may be particularly sensitive to further increases in abnormal infrastructure costs.

Consistent with National Policy:

For the reasons set out elsewhere in this response, Broadland District Council cannot currently see how the plan is consistent with National Policy, as in particular paragraphs 31, 68, 110 & 111 of the National Planning Policy Framework.

Duty to Co-operate

Amongst other things, the Duty to Co-operate requires each person who is a local planning authority to engage constructively, actively and on an ongoing basis with other local planning authorities in respect of strategic matters during the preparation of a local plans.

Strategic matters is defined as a "sustainable development or use of land that has or would have a significant impact on at least two planning areas".

In this instance Broadland District Council is concerned that the sustainable development or use of land proposed at North Walsham would have a significant impact on areas in Broadland, in particular on the B1150 in the Coltishall area.

The Council cannot see that there is a proportionate evidence base on which to conclude the effective of development at North Walsham on the Coltishall area would not be significant. Therefore, it appears to potentially fall within the definition of a strategic matter.

Broadland District Council has sought to repeatedly engage with North Norfolk District Council on this matter, and the evidence being prepared to address it. Unfortunately, North Norfolk Council have not engaged constructive, actively and on ongoing basis with Broadland District Council. As such Broadland does not see how North Norfolk has currently met its obligation under the Duty to Co-operate at this point in time.

Next Steps

Notwithstanding the issues outlines above, Broadland District Council remains committed to supporting neighbouring authorities to maintain up-to-date Local Plans. This includes, amongst other things, meeting their local housing need in accordance with the agreements set out

	in the Norfolk Strategic Planning Framework. Broadland District Council is therefore keen to engage with North Norfolk Council in order to explore how the matters within this submission can be resolved.
Modifications requested	Broadland District Council considers that it is necessary to prepare and/or provide proportionate evidence in relation to the proposed growth at North Walsham to effectively address the soundness issues outlined in the Council's response. North Norfolk District Council should engage with the Broadland District Council and Norfolk County Council as part of the process of preparing and/or providing this evidence.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To ensure that the Council's views in relation to the soundness and legal compliance of the plan are properly understood and taken into account as part of the independent examination.
Attachment(s)	

7.2 Delivering the Right Mix of Homes

Consultation Point Title	Delivering the Right Mix of Homes
Consultation Point Number	7.2
Section of the Plan	7.2.1
ID	LPS652
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective
Explanation	<i>7.2.1 The NPPF states that major housing developments should meet the need for affordable housing on-site.</i> In this respect, the Plan is not “positively prepared” and not “effective”. The Plan is not meeting the actual needs of the area. “Affordable” housing is not actually affordable to local people with housing needs. The low incomes and seasonal fluctuations in employment that are characteristic of the area due to the importance of tourism, mean that the definition of “affordable housing” is actually out of reach of many of the people who live and work in the area.
Modifications requested	The definition of “affordable housing” needs to be amended to make it genuinely affordable to local families. There needs to be a focus on the development of social housing to meet the needs of the most disadvantaged in society. By putting restrictions on the use of housing so that it is available only as a primary residence would have the effect of making more houses available to lower income families, and generally lower the price of housing, which would no longer be subject to the inflating effect of people moving from more expensive regions, and therefore being prepared to pay high prices to obtain a house in North Norfolk.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Delivering the Right Mix of Homes
Consultation Point Number	7.2
Section of the Plan	7.2.1
ID	LPS774
Response Date	28/02/2022 16:35:00
Name	Mr Mark Behrendt
Organisation	Home Builders Federation

Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not consistent with national policy
Explanation	The Council state in paragraph 7.2.1 that at least 10% of the affordable homes should be in affordable home ownership. This statement is not consistent with paragraph 65 of the NPPF which requires at least 10% of homes delivered on major development sites to be available as homes for affordable home ownership. These homes would form part of the overall affordable housing requirement on a site and should be met unless this would exceed the level of affordable housing required in the area or significantly prejudice the ability to meet the affordable housing needs of specific groups.
Modifications requested	At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF for the following reasons: <ul style="list-style-type: none"> • Approach to delivery of dwellings for affordable home ownership is inconsistent with national policy The Council should therefore amend paragraph 7.2.1 to ensure the local plan is consistent with national policy and provide the necessary clarity to both decision makers and developers as to the required proportion of homes to be provided as set out in the NPPF.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	I can also confirm that I wish to participate in the relevant hearing sessions in order to full represent our concerns which reflect the views of discussions with our membership who account of 80% of the market housing built in England and Wales.
Attachment(s)	

Policy HOU 2 Delivering the Right Mix of Homes

Consultation Point Title	Delivering the Right Mix of Homes
Consultation Point Number	Policy HOU 2
Section of the Plan	Policy HOU 2 Delivering the Right Mix of Homes
ID	LPS168
Response Date	23/02/2022 14:39:17
Name	Miss Naomi Chamberlain
Organisation	Norfolk County Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	The County Council welcomes the recognised importance of delivering affordable homes and the target of 15-35% of sites depending on size and location will assist in the delivery of housing and enable appropriate developer-funded infrastructure.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Delivering the Right Mix of Homes
Consultation Point Number	Policy HOU 2
Section of the Plan	Policy HOU 2 Delivering the Right Mix of Homes
ID	LPS229
Response Date	24/02/2022 11:29:03
Name	C & S Norfolk Ltd
Organisation	C&S Norfolk Ltd
Agent Name	Ms Gabrielle Rowan
Agent Organisation	Pegasus Group
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound	

* * * *	It is not positively prepared It is not effective It is not justified It is not consistent with national policy	
Explanation	SEE ATTACHED FILE Please see attached comments (ref: P19-1073-NNLP Reg 19 Reprs-February 2022)	
Modifications requested	SEE ATTACHED FILE Please see attached comments (ref: P19-1073-NNLP Reg 19 Reprs-February 2022)	
Appear at examination hearing session(s)? * * *	No, I do not wish to participate in examination hearing session(s) No, I do not wish to participate in examination hearing session(s) Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing		
Attachment(s)	P19-1073-NNLP Reg 19 reprs- February 2022.pdf (2)	
Consultation Point Title	Delivering the Right Mix of Homes	
Consultation Point Number	Policy HOU 2	
Section of the Plan	Policy HOU 2 Delivering the Right Mix of Homes	
ID	LPS233	
Response Date	24/02/2022 11:36:03	
Name	C & S Norfolk Ltd	
Organisation	C&S Norfolk Ltd	
Agent Name	Ms Gabrielle Rowan	
Agent Organisation	Pegasus Group	
Do you consider the plan to be Legally Compliant? * * *	Yes Yes No	
Has the duty to cooperate been met? * * *	Yes Yes No	
Do you consider the plan to be Sound? * * *	Yes Yes No	
Reason(s) not Sound * * * *	It is not positively prepared It is not effective It is not justified It is not consistent with national policy	
Explanation	SEE ATTACHED FILE Please see attached comments (ref: P19-1073-NNLP Reg 19 Reprs-February 2022)	
Modifications requested	SEE ATTACHED FILE Please see attached comments (ref: P19-1073-NNLP Reg 19 Reprs-February 2022)	
Appear at examination hearing session(s)? * * *	No, I do not wish to participate in examination hearing session(s) No, I do not wish to participate in examination hearing session(s) Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing		
Attachment(s)	P19-1073-NNLP Reg 19 reprs- February 2022.pdf (4)	
Consultation Point Title	Delivering the Right Mix of Homes	
Consultation Point Number	Policy HOU 2	
Section of the Plan	Policy HOU2 Delivering the Right Mix of Homes	
ID	LPS305	

Response Date	03/03/2022 09:02:34
Name	
Organisation	White Lodge (Norwich) Ltd
Agent Name	Mr Sam Hazell
Agent Organisation	Lawson Planning Partnership Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	<p>SEE ATTACHED FILE</p> <p>The Plan is unsound when considered against the related tests set out in paragraph 35 of the NPPF (2021) as explained below.</p> <ul style="list-style-type: none"> • Not Positively prepared– the proposed Small Growth Village Strategy approach will not provide enough homes of the right type in the right places for a growing population to meet the area’s needs (including affordable) and could frustrate the delivery of sustainable housing development. • Not Justified– the strategy is not appropriate, taking into account the reasonable alternative to allocate suitable and available sites in Small Growth Villages, and is not based on proportionate evidence. • Not Effective– the plan does not provide landowners/ developers with sufficient planning certainty and will not therefore, deliver the required development, including affordable housing, in Small Growth Villages over the plan period. • Not Consistent with National Policy– The proposed Small Growth Village Strategy approach will not deliver sufficient homes, nor support community vitality & services viability, it will not therefore enable the delivery of sustainable development in rural areas. This approach would run counter to para 78 which states, “In rural areas, planning policies and decisions should be responsive to local circumstances and support housing development that reflect local needs”, and para 79, “To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.” <p>We OBJECT to Policy HOU2 and the specified mix for sites of 6-25 dwellings, which when applied to sites in Small Growth Villages is not based on proportional evidence and is therefore not justified. Furthermore, the assumptions around developer profit were made when the proposed approach was for sites in Small Growth Villages to be allocated through Part 2 of the Plan. The current approach to consider proposals for housing development in smaller villages by way of their position relative to the defined settlement boundary along with the criteria set out in the policy provides a reduced level of certainty for landowners/ developers, for which a greater profit may be required to offset risk and to encourage sites to come forward, as set out in detail in the representations letter dated 1st March 2022, attached.</p> <p>Policy HOU2 will not therefore, achieve its stated purpose to ensure that the type, size and tenure or homes provided closely matches the existing and predicted future need of the local population.</p> <p>Please also see separate representations which request changes to the approach and detailed wording of Policy SS1, Policies Map, Policy HOU1, Policy HC4, Policy E6, and Policy DS1, which provide further</p>

	justification in support of our representations on the Plan which should be read as a whole.
Modifications requested	SEE ATTACHED FILE In order to make the Plan sound, a separate viability assessment which is proportionate and necessary should be undertaken to examine the policy interaction on small sites in Small Growth Villages, to ensure the Plan is justified and effective in meeting the identified housing need, including affordable need, on a District Level, as set out in detail in the representations letter dated 1st March 2022, attached.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	In accordance with our legal right to appear before and be heard by the inspector at the hearing. We wish to elaborate on our representations, which set out the changes we have requested to the strategy approach and the identified interrelated policies that are required to make the plan sound.
Attachment(s)	176_HighKelling_Reg19.Reps.Letter.FINAL_1.3.22.pdf (4) FINAL LPPRepslett WhiteLodge NNLP 18.06.19.pdf (4)
Consultation Point Title	Delivering the Right Mix of Homes
Consultation Point Number	Policy HOU 2
Section of the Plan	Policy HOU2 Delivering the Right Mix of Homes
ID	LPS389
Response Date	07/03/2022 11:44:24
Name	
Organisation	D L Ritchie Will Trust
Agent Name	David Jones
Agent Organisation	Armstrong Rigg Planning
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	SEE ATTACHED FILE Policy HOU2 – Delivering the Right Mix of Homes The table under policy HOU2 is considered confusing and lacking in clear information. In order to ensure that the policy is effective and therefore sound, we consider the following changes are necessary.
Modifications requested	SEE ATTACHED FILE Recommendation: Amend the policy to resolve the following issues: 1. The heading to the second column specifies that 'a minimum should be provided as First Homes'. Yet does not specify what that minimum figure is. The 25% figure being provided under the Required Affordable Housing Mix column. 2. Under the second column for schemes of 6-25 dwellings the table identifies an option of making the affordable homes provision, via financial contribution. The policy itself or supporting paragraphs provide no assistance in explaining how this is to be calculated nor does it refer to other guidance where this will be made clear.

	<p>3. For sites of 26 dwellings and over the table indicates that provision of affordable homes are to be delivered via developer contribution. This could be interpreted as referring to a financial contribution, which is not perceived to be the intention, is unnecessary and should be omitted.</p> <p>4. The policy should cater for circumstances where viability makes the delivery of the policy required level of affordable housing not possible. Wording should be introduced to the policy that in such circumstances proposals will be the subject of a viability appraisal to be provided by the applicant and subject of independent assessment on behalf of the Council.</p> <p>5. Required market housing mix column for schemes of 6 dwellings and larger it should be made clear that 'of the' minimum 50% two or three bed properties, approximately 20% of these should be two bed and approximately 80% three bed.</p> <p>6. There is no explanation or justification provided for why some rural areas are included in the 'Designated Rural Area' and other rural areas are not.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To participate in debate
Attachment(s)	Enclosure 5 - Policy HOU2 - Delivering the Right Mix of Homes.pdf
Consultation Point Title	Delivering the Right Mix of Homes
Consultation Point Number	Policy HOU 2
Section of the Plan	Policy HOU 2 Delivering the Right Mix of Homes
ID	LPS354
Response Date	04/03/2022 15:29:00
Name	
Organisation	Norfolk Homes Ltd
Agent Name	Mr Alan Presslee
Agent Organisation	Cornerstone Planning Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified; It is not consistent with national policy
Explanation	<p><u>Policy HOU2</u>: Issues and concerns were raised at the Council-run Viability Workshop (29 August 2018) about the basis and assumption by NCS (authors of the Plan Wide Viability Assessment, July 2018). [Has this been updated since, as we cannot find an updated version amongst the published/online Evidence Base?]. Errors and omissions were identified but it is unclear if/how those have been addressed. Consequently, there must be question-marks about the conclusions drawn and therefore the basis of the - in particular – 35% affordable housing level proposed by the Plan in Affordable Housing Zone 2. It is evident that a substantial proportion of proposed allocations (notably in North Walsham and Fakenham) are in Affordable Housing Zone 1, meaning that proportionately lower affordable housing rates will be delivered, even from the large allocations proposed therein. The Housing Incentive Scheme introduced by the Council was both innovative and effective. It is our view that its 25% level of affordable housing – which proved so effective in securing early delivery of</p>

	<p>housing (both market and affordable) should be maintained in Zone 2 through the new Local Plan.</p> <p>NPPF (paragraphs 61 and 62) states that: “<i>To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment</i>”. And “<i>Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies...</i>” Proposed Policy HOU2 takes this broad context and proposes/seeks very specific %s of house sizes (by bedroom numbers) amongst market housing for all schemes above six dwellings stating: “<i>Not less than 50% two and three bedroom properties in a mix comprising approx.. 20% two-bed and 80% three-bed.</i>” Such a policy is far too detailed and cannot be justified. To specify that all sites and all development over 6 dwellings should have such a specific mix is unnecessarily prescriptive and inflexible.</p> <p>Also, one assumes this is intended to address the housing needs assessment undertaken in 2019. This is already four years old, will be older still at the adoption of the Plan, and older still during the later stages of the Plan’s life. How can such a prescriptive policy be said to reflect an up-to-date housing need assessment?</p> <p>It is worth considering the proposed North Norfolk Policy HOU2 against Policy 5 (Homes) of the recently submitted Greater Norwich Local Plan. That policy says: “<i>Residential proposals should address the need for homes for all sectors of the community having regard to the latest housing evidence, including a variety of homes in terms of tenure and cost.</i>” Such an approach is entirely appropriate, and should be reflected in North Norfolk’s Plan.</p> <p>As submitted, Policy HOU2 is unsound as it neither justified, nor consistent with national policy.</p>
Modifications requested	As above
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To explain/elaborate
Attachment(s)	
Consultation Point Title	Delivering the Right Mix of Homes
Consultation Point Number	Policy HOU 2
Section of the Plan	Policy HOU 2 Delivering the Right Mix of Homes
ID	LPS375
Response Date	07/03/2022 15:14:00
Name	
Organisation	Sheringham House Holdings
Agent Name	Mr Alan Presslee
Agent Organisation	Cornerstone Planning Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified; It is not consistent with national policy
Explanation	Policy HOU2: The Interim Plan Wide Viability Assessment was published in October 2018 and forms part of the evidence base to this proposed Local Plan. At the Council-run Viability Workshop (29 August

	<p>2018), concerns were raised by many present, about the basis/ assumption made by NCS (authors of the Plan Wide Viability Assessment, July 2018). [Question: Has this been updated since, as we cannot find an updated version amongst the published/online Evidence Base?].</p> <p>Errors and omissions were identified but it is unclear if/how those have been addressed. Consequently, there must be question-marks about the conclusions drawn and therefore the basis of the - in particular – 35% affordable housing level proposed by the Plan in Affordable Housing Zone 2. The Housing Incentive Scheme introduced previously by the Council was both innovative and effective. It is our view that its 25% level of affordable housing – which proved so effective in securing early delivery of housing (both market and affordable) - should be maintained in Zone 2 through the new Local Plan, as this better reflects the viability position.</p> <p>As submitted, Policy HOU2 is unsound as it neither justified, nor consistent with national policy.</p>
Modifications requested	As above
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	to explain/elaborate
Attachment(s)	
Consultation Point Title	Delivering the Right Mix of Homes
Consultation Point Number	Policy HOU 2
Section of the Plan	Policy HOU 2 Delivering the Right Mix of Homes
ID	LPS448
Response Date	07/03/2022 15:35:43
Name	
Organisation	Hopkins Homes
Agent Name	Mr Jake Lambert
Agent Organisation	Bidwells
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	<p><u>This policy is unsound as it has not been justified</u></p> <p>For sites of comprising 151 dwellings or above, HOU2 seeks to secure an on-site contribution towards specialist elderly / care provision of a minimum of 60 units, and a further 40 units for each additional 250 dwellings thereafter.</p> <p>Hopkins Homes Ltd are currently preparing a planning application to bring forward a key element of the adopted and emerging Local Plan in North Walsham (allocation ref: NW01/B). Hopkins Homes Ltd are seeking to comply with this element of the emerging policy by reserving an element of the site for care provision.</p> <p>While Hopkins Homes Ltd are supportive of the delivery of specialist elderly / care provision in North Norfolk, this policy requirement is not justified by evidence, with the Strategic Housing Market Assessment (2019) and Housing Stock Modelling Report (2021) explicitly excluding care provision from its assessment of housing need. This element of</p>

	<p>HOU2 is therefore considered a departure from Paragraph 35(b) of the NPPF, as the policy approach to delivering care accommodation is not justified by evidence.</p> <p>By way of comparison, the emerging Greater Norwich Local Plan captures elderly / care provision within its wider housing policy and provides support for such development without prescribing delivery thresholds. In the absence of evidence to justify delivery thresholds for on-site care provision, it is therefore suggested that the North Norfolk Local Plan follows a similar approach.</p>
Modifications requested	<p>Reference to the on-site delivery of care provision in HOU2 should be deleted, and a separate development management policy formed to support proposals for care accommodation. This is suggested to ensure compliance with Paragraphs 35(b) and 35(c) of the NPPF by removing an unjustified and ineffective element from Policy HOU2.</p> <p>In addition, the '% Affordable Homes Required' element of Policy HOU2 should be embellished to recognise that delivery of the specified affordable housing percentages is subject to scheme viability</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To ensure that the proposed amendments in Question 6 are considered in detail as part of the hearing process.
Attachment(s)	
Consultation Point Title	Delivering the Right Mix of Homes
Consultation Point Number	Policy HOU 2
Section of the Plan	Policy HOU 2 Delivering the Right Mix of Homes
ID	LPS467
Response Date	07/03/2022 17:32:08
Name	
Organisation	Broadland Housing Association
Agent Name	Mr Jake Lambert
Agent Organisation	Bidwells
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<p>SEE ATTACHED FILE</p> <p><u>This policy is unsound as it has not been justified</u></p> <p>BHA seeks clarity on the future strategy for shared ownership housing. At present, the policy wording is unclear. The past couple of years has seen an increased pressure on residents of NNDC to afford in the open market and with first homes, the affordability, due to average salaries in the district also does not help this aspiration. The mix within the policy would point to shared ownership being squeezed out of market which will put increased pressure on the rented market as potential shared ownership owners will be also looking to that tenure to find housing. Due to market increases, shared ownership is not such an unviable option for development, so it maybe that an adjustment in the affordable delivery on a scheme may well be possible.</p>

Modifications requested	<p>SEE ATTACHED FILE</p> <p>The definition of affordable housing within the Glossary of the draft Local Plan is comprehensive. To ensure consistency with this definition, and to remove any ambiguity from Policy HOU2, footnote 6 of the policy should be amended to acknowledge that shared ownership products are included in the 'Rented' criterion. To achieve this, the following amendment is suggested:</p> <p>1 <i>'Rented' includes Social Rent, Affordable rent, Shared Ownership and Intermediate Rented products subject to affordability criteria.</i></p> <p>The second column of the table within Policy HOU2 also requires amendment to ensure clarity. As written, the second column sets out the thresholds for delivery of '% Affordable Homes Required of which a minimum should be provided as First Homes'. This wording is ambiguous and contrary to the Local Plan Glossary definition of affordable housing, which excludes First Homes from the definition. It should be amended to clearly identify the required delivery of First Homes as part of a development's affordable housing mix.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To ensure that the future strategy for shared ownership housing in the District is clearly represented in the policy.
Attachment(s)	North Norfolk Local Plan Regulation 19 Representation [Broadland Housing Association].pdf
Consultation Point Title	Delivering the Right Mix of Homes
Consultation Point Number	Policy HOU 2
Section of the Plan	Policy HOU 2 Delivering the Right Mix of Homes
ID	LPS409
Response Date	07/03/2022 12:40:00
Name	Mr Will Wright
Organisation	ESCO Developments, Flagship Housing Group & Lovell Partnerships
Agent Name	Sarah Hornbrook
Agent Organisation	Bidwells LLP
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	<p>For sites of comprising 151 dwellings or above, HOU2 seeks to secure an on-site contribution towards specialist elderly / care provision of a minimum of 60 units, and a further 40 units for each additional 250 dwellings thereafter.</p> <p>While the Consortium are supportive of the delivery of specialist elderly / care provision in North Norfolk, this policy requirement is not justified by evidence, with the Strategic Housing Market Assessment (2019) and Housing Stock Modelling Report (2021) explicitly excluding care provision from its assessment of housing need. This element of HOU2 is therefore considered a departure from Paragraph 35(b) of the NPPF, as the policy approach to delivering care accommodation is not justified by evidence.</p> <p>By way of comparison, the emerging Greater Norwich Local Plan captures elderly / care provision within its wider housing policy and</p>

	<p>provides support for such development without prescribing delivery thresholds. In the absence of evidence to justify delivery thresholds for on-site care provision, it is therefore suggested that the North Norfolk Local Plan follows a similar approach.</p> <p>Reference to the on-site delivery of care provision in HOU2 should be deleted, and a separate development management policy formed to support proposals for care accommodation. This is suggested to ensure compliance with Paragraphs 35(b) and 35(c) of the NPPF by removing an unjustified and ineffective element from Policy HOU2.</p> <p>In addition, the '% Affordable Homes Required' element of Policy HOU2 should be embellished to recognise that delivery of the specified affordable housing percentages is subject to scheme viability.</p> <p>The table should also clarify the percentage of First Homes required; at present it simply states, "% Affordable Homes Required of which a minimum should be provided as First Homes". This is therefore ambiguous and unclear, and consequently ineffective.</p>
Modifications requested	<p>Reference to the on-site delivery of care provision in HOU2 should be deleted, and a separate development management policy formed to support proposals for care accommodation.</p> <p>In addition, the '% Affordable Homes Required' element of Policy HOU2 should be embellished to recognise that delivery of the specified affordable housing percentages is subject to scheme viability.</p> <p>The table should also clarify the percentage of First Homes required.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	I reserve the right to appear prior to publication of the draft agendas that will set out the Inspector's matters and questions to form the basis of the discussions at the Hearings. The intention to appear is to seek to ensure that the Policy can be made sound.
Attachment(s)	
Consultation Point Title	Delivering the Right Mix of Homes
Consultation Point Number	Policy HOU 2
Section of the Plan	Policy HOU 2 Delivering the Right Mix of Homes
ID	LPS542
Response Date	07/03/2022 17:00:00
Name	Mr Julian Wells
Organisation	FW Properties Ltd
Agent Name	Mr Alastair Curran
Agent Organisation	Planning Places Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	Policy HOU2 seeks to provide 'the right mix of homes' although the strategy is considered to be unjustified and ineffective. The policy is open to interpretation, without clear guidance on how 'rural exception schemes, Gypsy and Traveller accommodation, or specialist residential accommodation' will be supported. The policy excludes these

	<p>accommodation types from delivery on larger sites but does not offer support or direction regarding where such proposals would fit within the wider Spatial Strategy or in which locations individual applications would be supported. It is considered for the proposed plan to be more justified, a clearer strategy, or clearer support for these uses is required within the policy wording.</p> <p>The policy does not provide sufficient flexibility for elderly care accommodation to be incorporated in more rural locations, or in areas of the district which are not proposing large site allocations. A plan-led system should facilitate a suitable strategy for combating need, such as providing sufficient elderly care accommodation to meet the identified need.</p> <p>HOU2, in combination with HOU1, places a great reliance on large scale windfall development or brownfield land to be redeveloped to deliver elderly care accommodation. Instead, it is considered that more land should be allocated across the district to facilitate elderly accommodation. For example, allocation HV01/B in Hoveton is allocated for elderly care accommodation, however policy HOU2 would require 0 units, and the allocation policy requires 60 units, however the expanded site would be able to deliver 70+, alongside dedicated open space and other design features to ensure a cohesive and quality development. It is considered that to make the plan more positively prepared and justified, the existing allocation should be looked at to deliver more elderly care accommodation, whilst support for development adjacent to settlement boundaries for elderly care accommodation in locations which do not have allocations, should be considered.</p>
Modifications requested	It is considered that to make the plan more positively prepared and justified, the existing allocations should be looked at to deliver more elderly care accommodation (such as HV01/B), whilst support for development adjacent to settlement boundaries for elderly care accommodation in locations which do not have allocations, should be considered.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	It would be beneficial to speak about the strategy for securing elderly care, and how larger allocations and windfall developments could realistically deliver elderly care units.
Attachment(s)	HOVET-IWD-XX-XX-DR-A-1010 - Proposed Site Layout Plan - P03.pdf (1)
Consultation Point Title	Delivering the Right Mix of Homes
Consultation Point Number	Policy HOU 2
Section of the Plan	Policy HOU 2 Delivering the Right Mix of Homes
ID	LPS536
Response Date	07/03/2022 17:00:00
Name	Mr Rob Ravillious
Organisation	Ilex Homes
Agent Name	Mr Alastair Curran
Agent Organisation	Planning Places Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound	It is not effective; It is not justified

<ul style="list-style-type: none"> * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy 	
Explanation	<p>Policy HOU2 is considered to be unjustified and ineffective due to the proposed strategy of requiring all large sites to deliver serviced self/custom build plots.</p> <p>As we know from the personal preference of multiple clients, as well as from market demands, custom/self-builders have a preference of where they wish to live. This does not typically result in requests for sites on large housing estates. Equally, those building out large housing estates do not wish to provide self/custom build plots as it has the potential to detrimentally impact the delivery of sites, such as with multiple contractors working simultaneously, or development occurring outside of a phased plan.</p> <p>Self/custom builders typically favour the option to develop more bespoke dwellings, which is typically at odds with volume house-built estates, where standard house types are replicated. Building within a contemporary estate negates these fundamental aspirations of self/custom builders and ultimately has negative impacts upon surrounding dwellings looking more uniform, and the beauty of the self/custom build being lost.</p> <p>Policy HOU2 should remove the requirement that large sites provide self-build plots, where self-builders do not want to be, and developers do not wish to build. Instead, support should be provided for the provision of speculative plots in sustainable locations, such as adjacent to or connected to existing settlements. This would result in a more justified and effective strategy that would see better-quality large-scale allocations, plus a more satisfied self/custom build population.</p>
Modifications requested	Policy HOU2 should remove the requirement that large sites provide self-build plots and instead, support should be provided for the provision of speculative plots in sustainable locations, such as adjacent to or connected to existing settlements.
Appear at examination hearing session(s)? <ul style="list-style-type: none"> * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s) 	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	It would be beneficial to speak about the strategy regarding self/custom builders, but also the preferences of larger developers, and how the strategy could be further developed to provide greater security of both groups of individuals.
Attachment(s)	
Consultation Point Title	Delivering the Right Mix of Homes
Consultation Point Number	Policy HOU 2
Section of the Plan	Policy HOU 2 Delivering the Right Mix of Homes
ID	LPS492
Response Date	07/03/2022 18:30:30
Name	
Organisation	Sutherland Homes
Agent Name	Mr Mark Singer
Agent Organisation	Barton Willmore
Do you consider the plan to be Legally Compliant? <ul style="list-style-type: none"> * Yes * No 	Yes
Has the duty to cooperate been met? <ul style="list-style-type: none"> * Yes * No 	Yes
Do you consider the plan to be Sound? <ul style="list-style-type: none"> * Yes * No 	No
Reason(s) not Sound <ul style="list-style-type: none"> * It is not positively prepared 	It is not justified

* It is not effective * It is not justified * It is not consistent with national policy	
Explanation	SEE ATTACHED FILE
Modifications requested	SEE ATTACHED FILE
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	Please see attached representations and sent via email
Attachment(s)	220307 Representations to NNDC Draft Local Plan Proposed Submission Version - Two Sites.pdf (2) 220307 Representations to NNDC Draft Local Plan Proposed Submission Version (C16).pdf (6)
Consultation Point Title	Delivering the Right Mix of Homes
Consultation Point Number	Policy HOU 2
Section of the Plan	Policy HOU 2 Delivering the Right Mix of Homes
ID	LPS773
Response Date	28/02/2022 16:35:00
Name	Mr Mark Behrendt
Organisation	Home Builders Federation
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	The policy is unsound as it is unjustified. Affordable housing As set out earlier in this representation the HBF consider that not all the costs faced by developers have been included the viability assessment. The Council will need to address these concerns to ensure that the cumulative impact of the costs required by the Council through the local plan are considered to ensure that they do not make development unviable and the plan as a whole undeliverable. In particular we are concerned that the cumulative cost could mean residential development in the lower value areas of the Borough (Zone 1) is unviable on the basis of the policies in the local plan. It is also unclear from the Councils evidence as to the what the need for affordable housing need is within North Norfolk. The Strategic Housing Market Assessment (SHMA) from 2017 gives an indication as to the need across the Central Norfolk HMA but it is not clear as to what the need is in North Norfolk. It is also notable that no new evidence on affordable housing needs has been produced since 2017 nor any assessment as to whether the 2017 SHMA remains consistent with the approach to assessing affordable housing needs set out in paragraphs in 2a-018 to 2a-024 of Planning Practice Guidance, which was updated in 2019.

Modifications requested	At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF for the following reasons: <ul style="list-style-type: none"> • No up-to-date assessment of affordable housing needs In order to ensure the policy is justified the Council should ensure that it has an up-to-date evidence base as to the need for affordable housing in the Borough.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	I can also confirm that I wish to participate in the relevant hearing sessions in order to full represent our concerns which reflect the views of discussions with our membership who account of 80% of the market housing built in England and Wales.
Attachment(s)	
Consultation Point Title	Delivering the Right Mix of Homes
Consultation Point Number	Policy HOU 2
Section of the Plan	Policy HOU 2 Delivering the Right Mix of Homes
ID	LPS775
Response Date	28/02/2022 16:35:00
Name	Mr Mark Behrendt
Organisation	Home Builders Federation
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	There is no justification to support the Council's policy that 2% of all homes delivered on sites over 25 dwellings should be self-build given that the Council has only 14 individuals on its self-build register. It is also important to note that the list expresses an interest in building their own home and not necessarily the ability to to actually finance such a project. Whilst we recognise that PPG sets out that other evidence of demand should be considered the evidence from the self-build register does not give any indication that there is significant demand for such plots in North Norfolk. It will also be important that the Council establish how many such homes they expect to deliver through such a policy if they are to justify its inclusion. Given wide number of sites that could potentially be affected by this policy and the low level of demand there is a significant risk that supply will exceed demand.
Modifications requested	At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF for the following reasons: <ul style="list-style-type: none"> • Requirements for the provision of self-build plots are unjustified Without the necessary evidence the policy cannot be justified and as such should be deleted. If further evidence of demand is established and the policy is considered to be sound, then provision should be made in the policy for unsold plots to return to the developer. Such provisions are necessary to ensure plots for much needed homes are built out and not left empty to the detriment of the other residents in

	the other homes on a development. We would recommend that after a marketing period of six months the home should be returned to the developer for completion.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	I can also confirm that I wish to participate in the relevant hearing sessions in order to full represent our concerns which reflect the views of discussions with our membership who account of 80% of the market housing built in England and Wales.
Attachment(s)	
Consultation Point Title	Delivering the Right Mix of Homes
Consultation Point Number	Policy HOU 2
Section of the Plan	Policy HOU 2 Delivering the Right Mix of Homes
ID	LPS782
Response Date	12/05/2022 11:53:00
Name	
Organisation	Churchill Retirement Living & McCarthy Stone
Agent Name	Mr Ziyad Thomas
Agent Organisation	Planning Issues Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified; It is not consistent with national policy
Explanation	SEE ATTACHED FILE Specialist Older Persons' Housing McCarthy Stone and Churchill Retirement Living are independent and competing housebuilders specialising in sheltered housing for older people. Together, we are responsible for delivering approximately 90% of England's specialist owner-occupied retirement housing Paragraph 1 of the PPG Housing for Older and Disabled people states: "The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing Offering older people, a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking". Paragraph: 001 Reference ID: 63-001-20190626 Across England the proportion of the population aged 65 and over is 23.4%, however in North Norfolk it is currently 32%, increasing to 39% by 2036. The district therefore has one of the highest proportions of older people living within it nationally. A Report entitled 'Study of demand for specialist retirement housing and accessible housing for older people and related planning and viability issues' forms part of the evidence base for the Local Plan and Figure 7.8: Demand for Specialist Retirement Housing - Districts details the need for specialist older persons' housing by type over the period 2020-2041 for each of the Norfolk Authorities. This advises that there

is a requirement for 2,341 units of specialist older persons' housing across North Norfolk over the Plan period, with the greatest need for properties for private ownership

The delivery of 2,341 units of specialist older persons' housing is a substantial undertaking over the Local Plan period and unless action is urgently taken the Council will struggle to address this need. We note and acknowledge that Policy HOU2 does stipulate a requirement for sites providing more than 150 homes to deliver a minimum of 60 units of specialist older persons' housing.

We commend the Council for taking active steps to increase the delivery of specialist older persons' housing by requiring their delivery in larger sites, which tend to be strategic urban extensions on greenfield sites. Both McCarthy Stone and Churchill Retirement Living rarely deliver developments on greenfield sites as they are too remote from shops, services and public transport. Proximity to these amenities is critical in facilitating continued independence in later life which is why both companies look for sites within 0.5 miles of a town or local centre.

The critical need to deliver specialist older persons' housing cannot be met through the measures detailed in policy HOU2 as currently proposed and a more supportive policy framework is required

We consider that, given the extent of projected need for these forms of accommodation, a dedicated policy for specialist older persons' housing that both acknowledges the need and stipulates the circumstance in which the Local Authority will support the delivery of housing suitable to be adapted to the elderly would be more appropriate.

We would refer the Council to Policy ST37. Specialist Housing of the emerging Bassetlaw Local Plan 2020-2037 (~~https://www.bassetlaw.gov.uk/Assets/DataAssets/Planning/Policy%20ST37%20Specialist%20Housing%202020-2037.pdf~~) which we consider to be an exemplar policy

It is also critical that the planning obligations regime proposed by the Council for these forms of accommodation is robust and proportionate. The viability of specialist older persons' housing is more finely balanced than that of other forms of housing and its CIL and affordable housing requirements must be carefully considered accordingly.

Affordable Housing

The North Norfolk District Council Interim Plan Wide Viability Assessment (2018) (hereafter referred to as the Viability Study) undertaken by NCS informs the planning obligations and the affordable housing requirement.

In assessing the aforementioned Viability Study, we note that viability appraisals were undertaken for a specialist older persons' housing typologies - however this was a 'blended typology' encompassing both 'Sheltered Housing and Extra Care accommodation.

In reviewing the methodology for assessing specialist older persons' housing, we note that very few of the inputs align with the methodology detailed in the Briefing Note on Viability Prepared for the Retirement Housing Group (hereafter referred to as the RHG Briefing Note) by Three Dragons We also note that various local plan policy costs (biodiversity net gain and EV charging points) have been omitted that the Viability Study was published in October 2018 and would benefit from being updated

In light of this the respondents have significant reservations over the findings of the Viability Assessment which we consider overstates the viability of these forms of accommodation. For example, the sales rate used is unknown as the report is opaque on this matter, it is however likely that it was higher than the 1 unit per month which, generally, reflects the respondent's experience. It is the respondent's view that the cumulative impact of other differences in viability assumptions used in the Viability Assessment presents an overly optimistic assessment of the viability of older persons' housing.

Mindful of the guidance in the PPG that is the responsibility of site owners and developers to engage in the Plan making process - McCarthy Stone and Churchill Retirement Living have provided a separate document with viability appraisals for sheltered and extra care older persons' housing typologies. It concludes that these forms of development are not able to provide an affordable housing contribution on previously developed land in the Authority.

The affordable housing target of 15% in Zone 1 and 35% in Zone 2 for specialist older persons' housing typologies detailed in Policy HOU2 would prejudice the delivery of these forms of development over the Plan period Policy HOU2 is therefore considered to be unjustified and ineffective and contrary to paragraph 35. of the NPPF accordingly.

	<p>Both McCarthy Stone and Churchill Retirement Living have struggled to bring forward specialist older persons' housing within North Norfolk historically as we have been unable to make development viable. The Authority is however of interest to both companies and we would appreciate the opportunity to work with Council Officers to help facilitate the delivery of specialist older persons' housing.</p> <p>To that end, we would like to draw the Council's attention to Paragraph 5.33 of Policy HPS Provision of Affordable Housing in the emerging Fareham Borough Local Plan which advises that:</p> <p><i>5.33 ... The Viability Study concludes that affordable housing is not viable for older persons and specialist housing. Therefore, Policy HPS does not apply to specialist housing or older persons housing.</i></p> <p>A nil affordable housing rate could facilitate a step-change in the delivery of older person's housing in the Authority, helping to meet the diverse housing needs of the elderly. The benefits of specialist older persons' housing extend beyond the delivery of planning obligations as these forms of development contribute to the regeneration of town centres and assist Council's by making savings on health and social care.</p>
<p>Modifications requested</p>	<p>SEE ATTACHED FILE</p> <p>McCarthy Stone and Churchill Retirement Living consider that the conclusions of the North Norfolk District Council Interim Plan Wide Viability Assessment (2021) does not in our view provide a credible basis for the affordable housing rates across the Authority for specialist older persons' housing.</p> <p>The evidence we have provided in our viability appraisals for Sheltered Housing and Extra Care Housing typologies, concludes that these forms of development cannot support the level of affordable housing and CIL being proposed in the emerging planning obligations regime.</p> <p>The affordable housing target of 15% and 40% for specialist older persons' housing typologies detailed in Policy HOU2. Delivering the Right Mix of Homes would prejudice the delivery of these forms of development over the Plan period.</p> <p>This is a critical issue as North Norfolk has one of the highest proportions of older people in the Country and is required to deliver 2,341 units of specialist older persons' housing over the Local Plan period. The adoption of affordable housing targets which undermine the viability and substantially impede the delivery of these, much needed, forms of development.</p> <p>Policy HOU2 is therefore considered to be unjustified and ineffective and contrary to paragraph 35. of the NPPF accordingly.</p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	
<p>Justification for appearing at hearing</p>	
<p>Attachment(s)</p>	<p>North Norfolk Review of Local Plan Viability Assessment.pdf</p>

7.3 Affordable Homes in the Countryside

Consultation Point Title	Affordable Homes in the Countryside
Consultation Point Number	7.3
Section of the Plan	7.3.2
ID	LPS119
Response Date	25/02/2022 10:06:58
Name	Mr Callum Ringer
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	The local plan fails to consider that open market homes built on exception sites are being used as second homes/holiday lets, and not as principal residences.
Modifications requested	The local plan does not go far enough in ensuring that all homes built within exception housing developments are for local benefit. This is particularly the case with any homes for sale on the open market. This could be improved by ensuring any open market homes built as part of an exception site must be sold to people with a local connection (similar to when Flagship sell off old council house stock) such as 5 years living or working in the district. Planning conditions or other mechanisms should be use to ensure that they must be used as a principal residence at all times. In the recent Hall Close development, 50% of open market sale homes are now holiday let's or second homes, which is wholly unacceptable. In addition, we have witnessed people getting homes on exceptions sites with their local connection and then swapping out of the area, although what can be done to limit this I do not know.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

Policy HOU 3 Affordable Homes in the Countryside (Rural Exceptions Housing)

Consultation Point Title	Affordable Homes in the Countryside (Rural Exceptions Housing)
Consultation Point Number	Policy HOU 3
Section of the Plan	Policy HOU 3 Affordable Homes in the Countryside (Rural Exceptions Housing)
ID	LPS137
Response Date	21/02/2022 15:45:32
Name	Mrs Gemma Harrison
Organisation	Holt Town Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Holt Town Council support the idea of policy 1 and 2, however, Cllrs feel affordable housing isn't always affordable and as such social housing provision needs to be increased in the town of Holt.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Affordable Homes in the Countryside (Rural Exceptions Housing)
Consultation Point Number	Policy HOU 3
Section of the Plan	Policy HOU 3 Affordable Homes in the Countryside (Rural Exceptions Housing)
ID	LPS391
Response Date	07/03/2022 11:53:48
Name	
Organisation	D L Ritchie Will Trust
Agent Name	David Jones
Agent Organisation	Armstrong Rigg Planning
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound	It is not consistent with national policy

<ul style="list-style-type: none"> * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy 	
Explanation	<p>SEE ATTACHED FILE</p> <p>Policy HOU3 – Affordable Homes in the Countryside (Rural Exceptions Housing)</p> <p>Our client broadly supports the provisions contained in this policy, but objects to its failure to mention entry-level exception sites and First Homes exception sites. In addition to rural exception sites, the NPPF supports the provision of entry-level exception sites at paragraph 72 and the PPG (ID: 70-024 to 029) supports First Homes exception sites.</p>
Modifications requested	<p>SEE ATTACHED FILE</p> <p>Recommendation: In order to accord with national policy and therefore be considered sound, the policy should be amended as follows:</p> <p>“Policy HOU 3</p> <p>Affordable Homes in the Countryside (Rural Exceptions Housing)</p> <p><u>3. The Council will also support the delivery of First Homes exception sites and entry-level exception sites in accordance with national policy.</u></p>
Appear at examination hearing session(s)? <ul style="list-style-type: none"> * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s) 	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To participate in discussions
Attachment(s)	Enclosure 6 - Policy HOU3 - Affordable Homes in the Countryside (Rural Exceptions Housing).pdf
Consultation Point Title	Affordable Homes in the Countryside (Rural Exceptions Housing)
Consultation Point Number	Policy HOU 3
Section of the Plan	Policy HOU 3 Affordable Homes in the Countryside (Rural Exceptions Housing)
ID	LPS468
Response Date	07/03/2022 17:04:00
Name	
Organisation	Broadland Housing Association
Agent Name	Mr Jake Lambert
Agent Organisation	Bidwells
Do you consider the plan to be Legally Compliant? <ul style="list-style-type: none"> * Yes * No 	Yes
Has the duty to cooperate been met? <ul style="list-style-type: none"> * Yes * No 	Yes
Do you consider the plan to be Sound? <ul style="list-style-type: none"> * Yes * No 	Yes
Reason(s) not Sound <ul style="list-style-type: none"> * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy 	
Explanation	BHA strongly supports this policy as written. BHA has delivered a significant number of affordable housing units in North Norfolk through the rural exception site policy, and wish to continue to do this through the emerging plan period.
Modifications requested	
Appear at examination hearing session(s)? <ul style="list-style-type: none"> * No, I do not wish to participate in examination hearing session(s) 	No, I do not wish to participate in examination hearing session(s)

* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

7.5 Gypsy, Traveller & Travelling Showpeople's Accommodation

Consultation Point Title	Gypsy, Traveller & Travelling Showpeople's Accommodation
Consultation Point Number	7.5
Section of the Plan	7.5 Gypsy, Traveller & Travelling Showpeople's Accommodation
ID	LPS489
Response Date	07/03/2022 18:21:00
Name	Sarah Peters
Organisation	ABZAG Ltd
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified; It is not consistent with national policy
Explanation	Section 7.5 Gypsy, Traveller & Travelling Showpeople's Accommodation fails to set out the OAN for this requirement through the Plan Period or what the future need is. Just stating in 7.5.4. that current pitches are sufficient is not good enough.
Modifications requested	Provide evidence. Allocate sites.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

Policy HOU 5 Gypsy, Traveller & Travelling Showpeople's Accommodation

Consultation Point Title	Gypsy, Traveller & Travelling Showpeople's Accommodation
Consultation Point Number	Policy HOU 5
Section of the Plan	Policy HOU 5 Gypsy, Traveller & Travelling Showpeople's Accommodation
ID	LPS344
Response Date	04/03/2022 14:40:00
Name	Miss Natalie Beal
Organisation	Broads Authority
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Comment Given that there is potential for Gypsy and Traveller and Travelling Showpeople accommodation to be away from settlements, we do not think that 'minimises impacts' is adequate. Our equivalent wording says 'The site will not harm the setting of any heritage asset or any adverse impact on the character and appearance of the surrounding landscape'. By saying 'minimises', this implies some impact is acceptable. Relevant part of NPPF The Broads and the setting of the Broads is protected at NPPF paragraph 176.
Modifications requested	Proposed change b. development minimises impact on the surrounding landscape; the site will not harm the setting of any heritage asset or any adverse impact on the character and appearance of the surrounding landscape.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

7.6 Replacement Dwellings, Extensions, Domestic Outbuildings & Annexed Accommodation

Consultation Point Title	Replacement Dwellings, Extensions, Domestic Outbuildings & Annexed Accommodation
Consultation Point Number	7.6
Section of the Plan	7.6.1
ID	LPS653
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	<p>7.6.1 Replacement dwellings, house extensions, the erection of domestic outbuildings and the provision of annexed accommodation account for a substantial proportion of all new development in the District. Well-designed proposals can enhance a property and its setting but excessively large and poorly designed proposals can individually, and cumulatively, damage both the character of the property and the local landscape.</p> <p>This does not meet the "Effective" test of soundness.</p> <p>This is too vague and seems to leave the decision of the individual planning officer. What is the definition of "excessively"? Will the views of local people/parish councils be taken into account? The cumulative impact of extensions can be significant. Approval of one large extension can encourage other people to make similar applications.</p>
Modifications requested	The Plan needs to provide a definition of what is "excessive development", and this should be achieved by listening to local representatives, who have a much better understanding of the impact of overdevelopment than a planning officer for whom it is merely an exercise on paper.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Replacement Dwellings, Extensions, Domestic Outbuildings & Annexed Accommodation
Consultation Point Number	7.6
Section of the Plan	7.6.3
ID	LPS654
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift

Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	<i>7.6.3 Proposals in Conservation Areas and those affecting Listed Buildings must also comply with the approach and all proposals should ensure no unacceptable impacts on the amenities of adjacent occupants in accordance with Policy ENV 6 'Protection of Amenity'.</i> This does not meet the "Effective" test of soundness. Unless it is explicitly stated that this applies not just for the development but for the lifetime of the development and even beyond.
Modifications requested	These restrictions should apply in perpetuity?
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

Policy HOU 6 Replacement Dwellings, Extensions, Domestic Outbuildings & Annexed Accommodation

Consultation Point Title	Replacement Dwellings, Extensions, Domestic Outbuildings & Annexed Accommodation
Consultation Point Number	Policy HOU 6
Section of the Plan	Policy HOU 6 Replacement Dwellings, Extensions, Domestic Outbuildings & Annexed Accommodation
ID	LPS106
Response Date	18/02/2022 15:10:55
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Point 1 a and 2- material increase in impact - can this be quantified or otherwise made objective? it sounds subjective and open to interpretation'
Modifications requested	Can there be reference here to an existing and proposed footprint and that proposals shd include the % change?
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Replacement Dwellings, Extensions, Domestic Outbuildings & Annexed Accommodation
Consultation Point Number	Policy HOU 6
Section of the Plan	Policy HOU 6 Replacement Dwellings, Extensions, Domestic Outbuildings & Annexed Accommodation
ID	LPS199
Response Date	23/02/2022 18:50:07
Name	Miss Donna Clarke
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes

Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively preparedIt is not consistent with national policy
Explanation	The policy takes no account of permitted development rights. Any question of material impact should take into consideration what is allowed as permitted development.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Replacement Dwellings, Extensions, Domestic Outbuildings & Annexed Accommodation
Consultation Point Number	Policy HOU 6
Section of the Plan	Policy HOU 6 Replacement Dwellings, Extensions, Domestic Outbuildings & Annexed Accommodation
ID	LPS655
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	<i>1. In determining what constitutes a 'material increase in impact' account will be taken of the size of the proposal in relation to the prevailing character of the area, the size of the existing property, the prominence of the site, plot coverage, and impact of the proposal on the landscape and townscape of the area.</i> This does not meet the "Effective" test of soundness. It is not clear what "account will be taken of" actually means.
Modifications requested	The Plan needs to state explicitly what is acceptable and under what circumstances.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

Policy HOU 7 Re-Use of Rural Buildings in the Countryside

Consultation Point Title	Re-Use of Rural Buildings in the Countryside
Consultation Point Number	Policy HOU 7
Section of the Plan	Policy HOU 7 Re-Use of Rural Buildings in the Countryside
ID	LPS107
Response Date	18/02/2022 15:17:37
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Does this policy apply to all designated countryside, conservation areas, AONB etc?
Modifications requested	There should be additional protection for such areas when considering reuse of rural buildings? eg for Proposals falling in designated countryside, conservations areas, protected landscapes and the AONB, the benefits must outweigh the harms.'
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Re-Use of Rural Buildings in the Countryside
Consultation Point Number	Policy HOU 7
Section of the Plan	Policy HOU 7 Re-Use of Rural Buildings in the Countryside
ID	LPS200
Response Date	23/02/2022 19:00:53
Name	Miss Donna Clarke
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound?	No

* Yes	
* No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	Many of these buildings have structural issues and if they can be repaired they should be. For example, replacement of a structural timber in a barn is quite common.
Modifications requested	Criterion b should be amended to "a substantial proportion of the structural elements", not all .
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Re-Use of Rural Buildings in the Countryside
Consultation Point Number	Policy HOU 7
Section of the Plan	Policy HOU 7 Re-Use of Rural Buildings in the Countryside
ID	LPS601
Response Date	28/02/2022 09:18:00
Name	Mr Daniel Broch
Organisation	
Agent Name	Mr Philip Atkinson
Agent Organisation	Lanpro Services
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively preparedIt is not justifiedIt is not consistent with national policy
Explanation	<p>My client Mr D Broch owns a disused storage building off the A149 at Blakeney that is structurally sound and no longer required for storage purposes. The former storage building is suitable for conversion to form a market affordable dwelling.</p> <p>The building to be converted is on the edge of the village of Blakeney that is defined as a Large Growth Village under Policy HOU1 of the emerging Local Plan. The building is some 120m or a 2-minute walk time from the existing settlement boundary for Blakeney. It is well related to existing shops and services within the village. The proposal is subject to an outstanding planning appeal (PINS reference APP/Y2620/W/21/3267614) and a current planning application that is not yet determined by North Norfolk District Council (NNDC reference PF/21/1524).</p> <p>My client considers that emerging Policy HOU7 as currently worded is UNSOUND as it is not positively prepared and not consistent with the tests contained in paragraph 80(c) of the National Planning Policy Framework (NPPF). Policy HOU7 is not justified as currently worded. National planning policy contained in paragraph 80(c) of the NPPF allows development in the countryside where it would re-use a</p>

	<p>redundant or disused building(s) and where it would enhance the immediate setting of the building to be converted.</p> <p>Paragraph 80(c) of the NPPF does not require confirmation of a building's structural soundness; the retention of the majority of the building's fabric; the preservation of the building's character regardless of its location; the preservation of the building's external appearance or its setting; the building to be ancient or more than 10-years old; or full compliance with the requirements of the North Norfolk Design Guide in any conversion. The NPPF only requires that the building to be converted is disused and the setting is enhanced under any proposal.</p>
Modifications requested	My client is therefore seeking amendments to the wording of Policy HOU7 to make it sound. This specifically includes the removal of the 'extra' criteria introduced into the current wording to ensure that the emerging Policy is positive prepared and enables (rather than precludes) rural housing delivery. This is to ensure a greater level of consistency with the NPPF.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	I can confirm that I would like to attend the forthcoming Examination in Public on behalf of my client to explain in detail these representations and discuss the necessary wording changes to Policy HOU7 that are required to meet the tests of soundness outlined in paragraph 35 of the NPPF.
Attachment(s)	
Consultation Point Title	Re-Use of Rural Buildings in the Countryside
Consultation Point Number	Policy HOU 7
Section of the Plan	Policy HOU 7 Re-Use of Rural Buildings in the Countryside
ID	LPS527
Response Date	03/03/2022 10:14:00
Name	Mr Jon Bonham
Organisation	
Agent Name	Mr Philip Atkinson
Agent Organisation	Lanpro Services
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared It is not consistent with national policy
Explanation	<p>My client Mr J Bonham owns a disused barn/stable building sitting within a former small holding off Trunch Road in Mundesley. The former barn/stable building is structurally sound, no longer required as a stable and suitable for conversion to either a market affordable dwelling or holiday let.</p> <p>The barn/stable building is on the edge of the village of Mundesley that is defined as a Large Growth Village under Policy HOU1 of the emerging Local Plan. The barn/stable building is some 330m or a 4-minute walk time from the existing settlement boundary for Mundesley. Furthermore it is well related to the full range of existing shops and services within the village.</p>

	<p>My client considers that emerging Policy HOU7 as currently worded is UNSOUND as it is not positively prepared or consistent with the tests contained in paragraph 80(c) of the National Planning Policy Framework (NPPF). Paragraph 80(c) of the NPPF allows development in the countryside where it would re-use a redundant or disused building(s) and where it would enhance the immediate setting of the building to be converted.</p> <p>Paragraph 80(c) of the NPPF does not require confirmation of a building's structural soundness; the retention of the majority of the building's fabric; the preservation of the building's character regardless of its location; the preservation of the building's external appearance or its setting; the building to be ancient (or more than 10-years old); or full compliance with the requirements of the North Norfolk Design Guide in any conversion. The NPPF only requires that the barn/stable building to be converted is disused and the setting is enhanced under any proposal. For information, my client intends to use the vacant small-holding surrounding the former barn/stable building to plant trees to offset the carbon footprint(s) of any future occupier(s) and to comply with the setting enhancement requirement.</p>
<p>Modifications requested</p>	<p>My client is therefore seeking amendments to the wording of Policy HOU7 to make it sound. This specifically includes the removal of the 'extra' criteria introduced into the current wording to ensure that the emerging Policy is positive prepared and enables (rather than precludes) rural housing delivery. This is to ensure a greater level of consistency with the NPPF.</p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>Justification for appearing at hearing</p>	<p>I can confirm that I would like to attend the forthcoming Examination in Public on behalf of my client to explain in detail these representations and discuss the necessary wording changes to Policy HOU7 that are required to meet the tests of soundness outlined in paragraph 35 of the NPPF.</p>
<p>Attachment(s)</p>	

Consultation Point Title	Accessible & Adaptable Homes
Consultation Point Number	Policy HOU 8
Section of the Plan	Policy HOU 8 Accessible & Adaptable Homes
ID	LPS288
Response Date	03/03/2022 16:08:00
Name	Mr Mamun Madaser
Organisation	Habinteg Housing Association
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared
Explanation	<p>Policy HOU 8 requires all new homes to meet Building regulations M4(2) Standard: Category 2 – Accessible and Adaptable Dwellings. Habinteg strongly supports this policy and recommends that all new homes meet Building Regulations M4 Category 2 accessible and adaptable standard homes to meet the needs of disabled and older people in North Norfolk.</p> <ul style="list-style-type: none"> • 1 million people in the UK are disabled (Scope) • 45% of pension age adults are disabled • 2 million people use wheelchairs (NHS) • Over 400,000 people nationwide are living in homes that do not provide the accessibility they need. <p>NORTH NORFOLK FREEDOM OF INFORMATION REQUEST</p> <p>On the 26th of January 2022 Habinteg submitted a freedom of information asking for data on the number of people in North Norfolk who require an accessible home. The following data was provided by the local authority:</p> <ul style="list-style-type: none"> • We had 1440 applicants on the Housing register (with status of nominated live or offered) have a long-term illness, health problems or disability, of which: <ul style="list-style-type: none"> • 1356 non wheelchair users • 84 Wheelchair users • 26 Permanent wheelchair users • 40 used a wheelchair both inside and outside of the home • 51 people on the waiting list have said that either they or a member of their household need an adapted property. • 469 applicants on the waiting list reported that their current housing is unsuitable and made their Health problems worse <p>LOCAL BENEFITS OF ADAPTABLE AND ACCESSIBLE HOMES</p> <p>New homes that meet category M4(2) will deliver:</p> <ul style="list-style-type: none"> • significantly fewer disabled people out of work, further reducing the impact on local government spending* • faster hospital discharges • Reduced local government expenditure on more expensive residential care settings • provide a better environment for ongoing independence when needs change,

*Research from Habinteg and Papworth Trust reported that disabled people with appropriate, accessible homes are four times more likely to be in work than those in unsuitable properties.

Providing suitably accessible homes in a welcoming and inclusively designed neighborhood can transform the lives of people who are so often left to 'make do' in unsuitable accommodation.

Habinteg tenants have reported that having their need for accessible homes met can have wide-ranging positive impacts:

- finding and maintaining employment
- Improved family life such as the ability to access their children's rooms or to cook a family meal
- the ability to come and go as they wish to visit family and friends.

Modifications requested

Policy HOU 8 requires a further 5% of dwellings on sites of 20 units or more meet Building regulations M4(3) Standard M4(3) Standard: Category 3.

Habinteg recommends that 10% of new homes comply with Part M4 (3) Standard (wheelchair accessible). Given the lack of wheelchair accessible properties available in general across the country, Habinteg believes that a 10% requirement of wheelchair ready (Part M4(3)) homes should be considered as a starting point for all local plans, with the remaining 90% meeting Part M4(2) accessible and adaptable dwellings.

We, therefore, recommend that North Norfolk sets a similar requirement for wheelchair user dwellings which requires that 10% of new homes comply with Part M4 (3) Standard (the other 90% required to be built to part M4 (2) accessible and adaptable standard). There is a precedent for the successful adoption of this approach in the London plan.

LOCAL BENEFITS OF WHEELCHAIR-READY HOMES

Habinteg recommends that alongside an increased supply of accessible and adaptable homes, an adequate number of homes should be built to Building Regulations M4 Category 3 (wheelchair user dwellings standard).

There are 1.2 million wheelchair users in the UK, and Habinteg's Insight Report found that just 1.5% of homes outside London are set to be built to wheelchair dwelling standards between 2020 and 2030.

Given the lack of wheelchair accessible properties available in general across the country, Habinteg believes that a 10% requirement of Part M4(3) homes should be considered as a starting point for all new homes, with the remaining 90% meeting Part M4(2) accessible and adaptable dwellings.

A NATIONAL ACCESSIBLE HOMES DEFICIT WITH A LOCAL SOLUTION

The English Housing survey reported that 91% of existing homes do not provide the four access features for even the lowest level of accessibility – a home that is 'visitable'.

Habinteg's Insight Report: A Forecast for Accessible Homes 2020 found that just 31.5% of homes are required to meet an accessible housing standard between 2020 and 2030. This will compound the national accessible homes deficit.

It is essential that new homes deliver accessibility and adaptability to help meet the national accessible homes deficit.

Further information and references:

- 1 Habinteg's in house consultancy Centre for Accessible Environments (CAE) offers bespoke training and consultancy on all aspects of access, including housing, public spaces and community facilities. CAE's services may benefit North Norfolk planning department in ensuring housing is delivered to the required M4(2) / M4(3) standards. The team has delivered support to several local authorities and statutory bodies such as Homes England, helping upskill staff in the specific characteristics of accessible housing and providing practical support reviewing development plans and proposals. You can read more on the CAE website at www.CAE.org.uk
- 2 Housing and Disabled People, a toolkit for local authorities, was a joint project of Habinteg and the Equality and Human Rights Commission published in 2018. The chapter on Planning for Accessible Homes provides some helpful suggestions for

	<p>producing robust planning policies for accessible housing. https://www.habinteg.org.uk/ehrc</p> <p>3 Habinteg's Insight Report: A Forecast for accessible homes assessed accessible housing policy across all local planning authorities in England. You can read the full report and headline findings here. https://www.habinteg.org.uk/localplans</p> <p>ABOUT HABINTEG</p> <p>Habinteg has over 50 years of experience as a registered provider of accessible and inclusive housing. Our mission is to provide and promote accessible and adaptable homes so that disabled and non-disabled people can live together as neighbours. Our response, therefore, focuses on issues of access and inclusion that we believe are vital to the development of a plan to serve the needs of the whole population of North Norfolk.</p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Accessible & Adaptable Homes
Consultation Point Number	Policy HOU 8
Section of the Plan	Policy HOU 8 Accessible & Adaptable Homes
ID	LPS356
Response Date	04/03/2022 15:31:00
Name	
Organisation	Norfolk Homes Ltd
Agent Name	Mr Alan Presslee
Agent Organisation	Cornerstone Planning Ltd
<p>Do you consider the plan to be Legally Compliant? * Yes * No</p>	Yes
<p>Has the duty to cooperate been met? * Yes * No</p>	Yes
<p>Do you consider the plan to be Sound? * Yes * No</p>	No
<p>Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy</p>	It is not justified; It is not consistent with national policy
Explanation	<p>Policy HOU8 seeks to apply what is already an optional standard, to 100% of new dwellings conforming to the requirements of Part M4(2) of the 2015 Building Regulations. This represents a radical and unwelcome approach to addressing an existing shortfall. At present all of Norfolk Homes Ltd.'s open market and shared equity houses comply with Part M 2004 Regulations, which is the same as the current mandatory Part M4(1) 2015 Regulations. Its current Affordable Rented house types are designed to comply with the Lifetime Homes Standards and will satisfy the new Part M4(2), which is what draft Policy HOU8 is seeking to apply. Meeting the requirements for the larger WC/cloakroom provision on some smaller (3-bed +) house types is extremely challenging: some 3 bed dwelling types will require enlarging/remodelling to achieve this. Further reworking of bathrooms and bedrooms will also be needed. All of which have implications for viability. Paragraph 1b of Draft Policy HOU8 requires that 5% of dwellings on sites of 20 or more units should be wheelchair adaptable. Whilst Norfolk Homes has already applied this design requirements on existing dwellings, it should be borne in mind that these require</p>

	<p>larger plot area allocations on a site-by-site basis. Sloping sites will in particular be a challenge, in respect of access and parking. The draft policy should bear in mind constraints such as the topography of a site. Before seeking to apply such a policy across the board, the Council ought to be aware of the practical and financial implications to a housebuilder. Also, the requirement for excessively large doors at first floor level (previously only required to ground floor habitable rooms) has knock-on effects for all dwelling types.</p> <p>Additional work/cost is required by the policy: Paragraph 4 says "All residential development proposals will set out in a Design & Access Statement how each dwelling type complies with or exceeds the M4(2) and M4(3) standards." A requirement for even more supporting documentation is entirely at odds with the Government's state intention of reducing the burden on house builders and ensuring the planning system is quicker, efficient and more responsive in delivering houses. The policy is an example of planning seeking to interfere with issues squarely in the remit of the Building Regulations, and for which a planning policy is entirely superfluous. Planning policies should go no further than being prescriptive on the affordable rented dwellings; everything else should be left to housebuilders, Building Regulations and the market/s in which they operate. An unintended consequence of this policy</p> <p>would be an adverse effect on the provision of smaller dwellings, resulting in fewer being built, and those being more expensive. Policy HOU8 is excessive, onerous and superfluous. The Council should be cautious in readily dismissing viability impacts: not only would M4(2) and M4(3) increase build costs but in practise likely increase dwelling and curtilage sizes, and thereby reduce build density on site (reducing the number of houses to be built), with various implications</p>
Modifications requested	As above
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	Explain/elaborate
Attachment(s)	
Consultation Point Title	Accessible & Adaptable Homes
Consultation Point Number	Policy HOU 8
Section of the Plan	Policy HOU 8 Accessible & Adaptable Homes
ID	LPS449
Response Date	07/03/2022 15:38:05
Name	
Organisation	Hopkins Homes
Agent Name	Mr Jake Lambert
Agent Organisation	Bidwells
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified
Explanation	<u>This policy is unsound as it has not been justified</u>

	<p>Policy HOU8 seeks to require all new residential dwellings to meet Building Regulation Part M4(2) standards, with 5% of properties to meet Part M4(3) standards.</p> <p>While Hopkins Homes Ltd are supportive of the delivery of accessible and adaptable homes, the emerging policy requirement to achieve M4(2) compliance across all properties is not considered to be justified by evidence within the Local Plan Evidence Base, thereby causing conflict with Paragraph 35(b) of the NPPF. Also, no analysis has been undertaken as part of the Evidence Base to understand whether the delivery of M4(2) and M4(3) compliant properties in North Norfolk to levels identified in the draft policy is deliverable/viable, thereby raising potential conflict with Paragraph 35(b) of the NPPF.</p> <p>By way of comparison, the emerging Greater Norwich Local Plan seeks to require major housing developments to provide at least 20% of homes to M4(2) standard (Policy 5). This is a more proportionate approach to the application of M4(2) in practice.</p>
Modifications requested	It is suggested that the requirement to require all new dwellings to meet Part M4(2) standards should be revisited to ensure the deliverability and effectiveness of the policy, in accordance with Paragraphs 35(b) and (c) of the NPPF, and that the delivery of housing development in the District in the period to 2036 is not delayed by additional layers of viability review to justify a departure from providing 100% M4(2) provision.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Accessible & Adaptable Homes
Consultation Point Number	Policy HOU 8
Section of the Plan	Policy HOU 8 Accessible & Adaptable Homes
ID	LPS410
Response Date	07/03/2022 12:43:00
Name	Mr Will Wright
Organisation	ESCO Developments, Flagship Housing Group & Lovell Partnerships
Agent Name	Sarah Hornbrook
Agent Organisation	Bidwells LLP
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	<p>Policy HOU8 seeks to require all new residential dwellings to meet Building Regulation Part M4(2) standards, with 5% of properties to meet Part M4(3) standards.</p> <p>While the Consortium are supportive of the delivery of accessible and adaptable homes, the emerging policy requirement to achieve M4(2) compliance across all properties is not considered to be justified by evidence within the Local Plan Evidence Base, thereby causing conflict with Paragraph 35(b) of the NPPF. Also, no analysis has been undertaken as part of the Evidence Base to understand whether the delivery of M4(2) and M4(3) compliant properties in North Norfolk to</p>

	<p>levels identified in the draft policy is deliverable/viable, thereby raising potential conflict with Paragraph 35(b) of the NPPF.</p> <p>By way of comparison, the emerging Greater Norwich Local Plan seeks to require major housing developments to provide at least 20% of homes to M4(2) standard (Policy 5). This is a more proportionate approach to the application of M4(2) in practice.</p>
Modifications requested	It is suggested that the requirement to require all new dwellings to meet Part M4(2) standards should be revisited to ensure the deliverability and effectiveness of the policy, in accordance with Paragraphs 35(b) and (c) of the NPPF, and that the delivery of housing development in the District in the period to 2036 is not delayed by additional layers of viability review to justify a departure from providing 100% M4(2) provision.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	I reserve the right to appear prior to publication of the draft agendas that will set out the Inspector's matters and questions to form the basis of the discussions at the Hearings. The intention to appear is to seek to ensure that the Policy can be made sound.
Attachment(s)	
Consultation Point Title	Accessible & Adaptable Homes
Consultation Point Number	Policy HOU 8
Section of the Plan	Policy HOU 8 Accessible & Adaptable Homes
ID	LPS776
Response Date	28/02/2022 16:35:00
Name	Mr Mark Behrendt
Organisation	Home Builders Federation
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	<p>The policy is unsound as it has not been justified.</p> <p>The HBF and its members recognise that some homes will need to be built to higher accessibility to standard to meet the increasing demand for such homes. However, the HBF does not consider the Council have justified the requirement for all new homes need to be built to part M4(2) of the Building Regulations in order to meet needs moving forward.</p> <p>The Council outline that the population of North Norfolk is ageing and that will have an impact on the number of homes that will need to be more accessible in future. This is not disputed. However, when considering whether this ageing population translates to the need for all new homes to be built to part M4(2) it is important to consider how many of those over 65 will not only require the home to be adapted but will also seek to move in order to have their needs met. Some evidence relating to this is provided in the English Homes Survey. Whilst we recognise that this is a national study it provides an indication as to the proportion of more adaptable homes that are required. The</p>

	<p>study examined the need for adaptations in 2014/151 and noted that just 9% of all households in England which had one or more people with a long-term limiting illness or disability required adaptations to their home and that this had not changed since 2011-12. So, despite an increasing amount of older people in the general populace the proportion of the population requiring adaptations had not changed as a result of a long-term illness or disability had not changed.</p> <p>The English Homes Survey also found that in 2014-15, 81% of households that required adaptations in their home, due to their long-term limiting disability, felt their current home was suitable for their needs and that 10% of those households whose home required an adaptation were trying to move somewhere more suitable. So, whilst there is an ageing population this does not directly lead to the need for all new homes built to higher accessibility standards. An ageing population will lead to more people who are likely to have a mobility problem but not necessarily more people who need a new home built to the M4(2) standard. Many older people, and indeed those of all ages with a long-term limiting illness or disability, will be able to adapt their existing homes to meet their needs and do not need to find alternative accommodation. It is also the case that for many people a new home built to the mandatory M4(1) standard will offer sufficient accessibility and adaptability throughout their life.</p> <p>Finally, it is also the case that many older people are less likely to move home and the majority of those 'new' older person households forming over the plan period are currently resident in the Borough – they have not moved from elsewhere; they are a reflection of an ageing population. Many will want to stay in their own home and, if necessary, have that home adapted to meet their needs. In many cases that will be possible, and even more so in more recently built homes where accessibility is significantly better than in older housing stock.</p>
Modifications requested	<p>At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF for the following reasons:</p> <ul style="list-style-type: none"> • Requirements related to the technical standards for accessible homes have not been adequately justified. <p>To conclude whilst the HBF consider that there will be a need for some homes to be built to part M4(2) of the Building Regulations we do not consider the evidence to show that all homes should be built to this standard. It is important that the Council, as required by footnote 49 to paragraph 130 of the NPPF, provides the necessary evidence to show that the need for accessible and adaptable homes justifies this policy.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	I can also confirm that I wish to participate in the relevant hearing sessions in order to full represent our concerns which reflect the views of discussions with our membership who account of 80% of the market housing built in England and Wales.
Attachment(s)	
Consultation Point Title	Accessible & Adaptable Homes
Consultation Point Number	Policy HOU 8
Section of the Plan	Policy HOU 8 Accessible & Adaptable Homes
ID	LPS783
Response Date	07/03/2022 17:00:00
Name	
Organisation	Churchill Retirement Living & McCarthy Stone
Agent Name	Mr Ziyad Thomas
Agent Organisation	Planning Issues Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met?	

* Yes	
* No	
Do you consider the plan to be Sound?	No
* Yes	
* No	
Reason(s) not Sound	
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	<p>The Council's commitment towards providing accessible and adaptable homes to support the changing needs of residents is commendable. Accordingly, there is a requirement for:</p> <ul style="list-style-type: none"> - All new build dwellings to meet Part f\4 Category 2: Accessible & Adaptable Dwellings of the Building Regulations - Developments of 20 or more units to have 5% of dwellings to meet Part f\14 Category 3: Wheelchair User Dwellings of the Building Regulations <p>We note however that the North Norfolk District Council Interim Plan Wide Viability Assessment (2018) undertaken by NCS Chartered Surveyors does not allow additional costs for delivering Part M4(3). We respectfully refer to additional build costs for enhanced accessibility standards have been allowed for in Local Plan Viability Assessments undertaken by other consultants.</p> <ul style="list-style-type: none"> • the recent Dartford Local Plan Viability Assessment by Dixon Searle Partnership allows £1,646 (Flats) £2,447 (Houses) per dwelling built to M4(2). For M4(3) they allow £15,691 (Flats) £26,816 (Houses) per dwelling. • The recent Swale Borough Council Local Viability Study by Aspinall Verdi allows £1,400 per dwelling built to M4(2) and £10,307 per dwelling for M4(3).
Modifications requested	We would encourage the LPA to include an appropriate uplift in the build costs in the Local Plan Viability Assessment to reflect the additional cost of 5% of all new dwellings built to Part M4(3).
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Policy HOU 9 Minimum Space Standards

Consultation Point Title	Minimum Space Standards
Consultation Point Number	Policy HOU 9
Section of the Plan	Policy HOU 9 Minimum Space Standards
ID	LPS469
Response Date	07/03/2022 17:06:57
Name	
Organisation	Broadland Housing Association
Agent Name	Mr Jake Lambert
Agent Organisation	Bidwells
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<u>This policy is unsound as it has not been justified</u> Minimum space standards can, as set out in paragraph 56-002 of Planning Practice Guidance (PPG), only be introduced where they are needed and where they do not impact on the viability of development. BHA delivers housing in accordance with relevant Homes England standards, which are considered appropriate to continue to guide the delivery of housing in the District without requiring compliance with NDSS.
Modifications requested	BHA wish to suggest deletion of this policy, for the reasons stated in Question 5.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Minimum Space Standards
Consultation Point Number	Policy HOU 9
Section of the Plan	Policy HOU 9 Minimum Space Standards
ID	LPS777
Response Date	28/02/2022 16:35:00
Name	Mr Mark Behrendt
Organisation	Home Builders Federation
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes	

* No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	<p>The policy is not sound as it has not be justified.</p> <p>Minimum space standards can, as set out in paragraph 56-002 of Planning Practice Guidance (PPG), only be introduced where they are needed and where they do not impact on the viability of development. The application of space standards has been considered in the viability assessment; however, we could not find any evidence on the need for space standards. The Council refer to an ageing population but provides no evidence that homes are coming forward below space standards in order to justify the application of minimum space standards.</p> <p>Whilst the HBF share the Council desires to see good quality homes delivered within Tendring we also consider that space standards can, in some instances, have a negative impact upon affordability issues and reduce customer choice. In terms of choice, for example, some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards, but which would allow on lower incomes can afford a property which has their required number of bedrooms. Given the poor affordability of property in the area it is important that the Council can provide, in line with PPG, robust evidence that there is a need to introduce the optional space standards – that these standards are a must have rather than a nice to have policy.</p>
Modifications requested	<p>At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF for the following reasons:</p> <ul style="list-style-type: none"> • Requirements related to the technical standards for space standards have not been adequately justified. <p>Given that there is little to suggest that development below space standards is an endemic concern within North Norfolk we would suggest that the policy is deleted from the plan. This would give the Council greater flexibility to maximise the number of sites that are developable as well as extending consumer choice to more households.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	I can also confirm that I wish to participate in the relevant hearing sessions in order to full represent our concerns which reflect the views of discussions with our membership who account of 80% of the market housing built in England and Wales.
Attachment(s)	

8 Economy

Consultation Point Title	Economy
Consultation Point Number	8
Section of the Plan	E6 and E8
ID	LPS326
Response Date	03/03/2022 18:57:00
Name	
Organisation	Kelling Estate LLP
Agent Name	Roger Welchman
Agent Organisation	Armstrong Rigg Planning
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	SEE ATTACHED FILE
Modifications requested	SEE ATTACHED FILE
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	9. Policy E6 - Representation to Regulation 19 Version of North Norfolk Local Plan.pdf 10. Policy E8 - Representation to Regulation 19 Version of North Norfolk Local Plan.pdf
Consultation Point Title	Economy
Consultation Point Number	8
Section of the Plan	8 Economy
ID	LPS283
Response Date	01/03/2022 11:02:19
Name	Mrs Clare Stagg
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound	It is not effective

<ul style="list-style-type: none"> * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy 	
<p>Explanation</p>	<p>As a resident to East Runton I am keen to ensure protection of all of the current village amenity.</p> <p>I have found this form quite complex to use and not user friendly so I am sorry if this is not in the correct places.</p> <p>However I am keen to ensure any policy protects all current village amenity - in terms of retail and A4 use and takeaway. We have the fishing boat, Sammy's (currently in for change of use), bernies, a fish and chip take away and the village shop and the butchers.</p> <p>We have lost in the last few years the Village tea rooms with associated shop, the Kit Bag and the Constantia. To preserve village amenity, tourism and employment I would like the plan to support new retail/A4 uses, and enshrine in policy of strong protections of what is existing.</p> <p>This supports local use and is environmentally friendly in so far as not requiring village residents to have to drive to other locations - and supports tourism - the village is on the coastal path and creates local employment.</p> <p>Housing where developed should focus on affordable housing for locals - not second homes. There is limited need and what need there is surely is for locals.</p>
<p>Modifications requested</p>	
<p>Appear at examination hearing session(s)?</p> <ul style="list-style-type: none"> * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s) 	
<p>Justification for appearing at hearing</p>	
<p>Attachment(s)</p>	

Policy E 1 Employment Land

Consultation Point Title	Employment Land
Consultation Point Number	Policy E 1
Section of the Plan	Policy E 1 Employment Land
ID	LPS173
Response Date	23/02/2022 14:40:33
Name	Miss Naomi Chamberlain
Organisation	Norfolk County Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	The County Council generally supports the proposed local plan approach to employment land supply, ensuring quality, quantity, and distribution so that there are opportunities for employment development throughout the District to meet the needs of today and throughout the Plan period.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Employment Land
Consultation Point Number	Policy E 1
Section of the Plan	Policy E 1 Employment Land
ID	LPS613
Response Date	07/03/2022 09:36:00
Name	Cllr Nigel Dixon
Organisation	Ward Member for Hoveton & Tunstead (NNDC)
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No

Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	In terms of the broad strategy, it's unsound in that doesn't strike an appropriate balance in delivering sufficient employment land and infrastructure improvements to sustainably support the proposed housing allocations. In particular, to achieve more sustainable communities more employment opportunities are needed, across the skill range, within easy reach of most residential settlements.
Modifications requested	<p>The Plan needs to be modified so that more employment land is allocated to ensure there's sufficient choice of location and space available, with adequate infrastructure capacity, to attract inward investment, business migration and expansion opportunities. Such employment land is mostly found by making mixed residential and employment land allocations either as integral or split sites. Depending on the specifics of the employment sites, infrastructure capacity improvements will need to be identified alongside those allocations to ensure the potential can be realised.</p> <p>It's acknowledged that huge efforts have been made to comply with the complex and onerous demands of central government while trying to protect the special character of North Norfolk and meet the rapidly rising need to conserve and rebuild biodiversity as well as the climate change agenda. The above, proportionate and complementary, modifications are sought to fill obvious gaps and redress imbalances at both strategic and local grass roots levels to ensure the Local Plan is sound and fit for purpose over the next 15+ years. If it's not possible to incorporate these modifications, then please treat these representations as objections.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Employment Land
Consultation Point Number	Policy E 1
Section of the Plan	Policy E 1 Employment Land
ID	LPS531
Response Date	07/03/2022 17:00:00
Name	Mr David Williams
Organisation	PSK Building Surveyors Ltd
Agent Name	Mr Alastair Curran
Agent Organisation	Planning Places Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective It is not consistent with national policy
Explanation	It is considered that policy E1 is not consistent with national policy and ineffective . Policy E1 conflicts with paragraph 81 of the NPPF,

<p>which states policies and decision should help create conditions in which businesses can invest, expand and adapt. Sheringham has 3.95 ha of existing employment areas with no new employment land allocated. Within Site Weybourne Road (Weybourne Road Sheringham, Site Location Plan) the existing employment buildings are in a poor physical state and have reached the end of their serviceable life.</p> <p>The main building is predominantly steel frame construction with timber upper floors, concrete ground floors with pits and storage tanks configured to the current occupier's heavy gauge manufacturing and engineering processes. The external fabric is predominantly clad in asbestos cement and plastisol coated sheeting, with brick skin external walls and low performance glazing. The building is very poorly insulated and its construction methods, ad hoc internal arrangements, underground storage tank provision and extremely poor energy efficiency means that it no longer accords with modern day expectations and performance standards.</p> <p>The standard and condition of the building is such that it only lends itself to temporary repair. It would not be economically viable or in some regards practically possible to address the building's performance concerns to bring it up to modern standards without wholesale demolition and rebuilding. As a result, the existing building will not support a long term, viable and sustainable industrial use. It is therefore unlikely these dilapidated buildings will be restored, and as they reach the end of their serviceable life, will result in a likely eye sore and an area of dereliction in an urban centre, in conflict with the aims of paragraph 92b of the NPPF.</p> <p>Despite the lack of usability, this employment area is protected under the new Local Plan, alongside other similar sites within the district. This is not consistent with national policy, as the NPPF states in paragraph 7 that there must be sufficient land of the right types available in the right places and at the right time to support growth, innovation, and productivity. Equally paragraph 81 requires the support for businesses to "invest, expand and adapt."</p> <p>Policy E1 should support the redevelopment of employment land on the condition it is relocated locally, or it should allow enabling development/mixed-use development. This would secure the continuation of some employment use on aging and deteriorating sites but unlocking financial reinvestment through appropriate new development. Thus, unlocking the future retention of employment uses, whilst opening the door to new, and innovative mixed-use proposals, reflecting the changing employment market.</p> <p>Expanding the policy through the above recommendations would result in employment land being protected in Sheringham, and elsewhere in the district, where otherwise sites would deteriorate, and new businesses deterred. Specifically for Weybourne Road, Kingsland's corporate aspirations are limited by the site, as investment into the facility is cost-prohibitive. Please refer to PSK's letter dated 1 March 2022 which provides budget costs for both refurbishment and redevelopment of the existing building to current industrial design standards. This, alongside the limited demand and return that a new industrial facility could attract, renders industrial use on the site unviable. As such, there is a risk that the site may become obsolete, and the use lost. In this instance, rewording policy E1 would facilitate new benefits (such as the provision of an easier access to the new leisure centre in the case of Sheringham) whilst also enabling new business to invest locally through more appropriate units (such as office space which would be better for existing neighbouring residential units' amenity).</p> <p>The current long-term future for much of Sheringham's employment land is a poor-quality industrial site with increasingly unsafe buildings, located adjacent to a residential area and acting as a barrier for use of the new leisure centre. Therefore, for the Plan to be sound there should be exceptions to the rule of protecting employment land in its current state, such as where it is not financially viable to retain and refurbish. For the plan to be consistent with national policy, namely with paragraph 124 of the NPPF, where the most effective use of land should be sought, policy E1 should enable the partial redevelopment of employment land. This would better protect existing employment opportunities or facilitate the relocation of employment uses and allow for enabling development to result in better quality employment land being provided.</p>	<p>Policy E1 should support the redevelopment of employment land on the condition it is relocated locally and provides better quality buildings, or it should allow enabling development/mixed-use development to</p>
<p>Modifications requested</p>	<p>Policy E1 should support the redevelopment of employment land on the condition it is relocated locally and provides better quality buildings, or it should allow enabling development/mixed-use development to</p>

	<p>replace sites, to ensure the long-term survivability of some form of employment use on site.</p> <p>Expanding the policy through the above recommendations would result in employment land being protected in Sheringham, and elsewhere in the district, where otherwise sites would deteriorate, and new businesses deterred.</p>
<p>Appear at examination hearing session(s)?</p> <p>* No, I do not wish to participate in examination hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To elaborate on the need for flexibility in the policy to ensure the current changing market demands, alongside the aging stock of employment land can continue to provide employment opportunities long into the future of the plan period.
Attachment(s)	20220307 - Site Location Plan Sheringham.pdf 220301 PSK to LRW.pdf
Consultation Point Title	Employment Land
Consultation Point Number	Policy E 1
Section of the Plan	Policy E 1 Employment Land
ID	LPS751
Response Date	04/03/2022 15:07:00
Name	
Organisation	Glavenhill Strategic Land
Agent Name	Mr Philip Atkinson
Agent Organisation	Lanpro Services
<p>Do you consider the plan to be Legally Compliant?</p> <p>* Yes</p> <p>* No</p>	
<p>Has the duty to cooperate been met?</p> <p>* Yes</p> <p>* No</p>	
<p>Do you consider the plan to be Sound?</p> <p>* Yes</p> <p>* No</p>	No
<p>Reason(s) not Sound</p> <p>* It is not positively prepared</p> <p>* It is not effective</p> <p>* It is not justified</p> <p>* It is not consistent with national policy</p>	
Explanation	<p>My client Glavenhill is promoting lower-grade agricultural land at Badersfield for balanced mixed-use development. Badersfield is identified in Policy SS2 of the emerging Local Plan as a Small Growth Village that in combination with other villages in the District will receive some 7.6% of planned housing growth over the emerging Plan-period. This OBJECTION should be read in conjunction with previous representations submitted by Glavenhill relating to land at Badersfield.</p> <p>Glavenhill consider that Badersfield is a good location for housing and employment growth and supports the strategic aim as outlined in paragraph 8.0.1 of the emerging Local Plan that states "Delivering sustainable growth requires that housing growth is matched with improved employment opportunities close to where people live."</p> <p>Glavenhill control land to the north and east of the village of Badersfield adjacent and to the north of Scottow Enterprise Park (SEP). Glavenhill has previously promoted this land for a mix of private and affordable housing, elderly and specialist care, new community services and employment uses at various stages in the emerging Local Plan's evolution. My client is concerned that no new housing or employment growth is proposed to be allocated at Badersfield to support the continued growth and success of the SEP.</p> <p>As the Council is aware the SEP contains some 24.6 ha of existing Class E, B2 and B8 employment space (the latter is heavily constrained by access and movement problems). Policy E1 of the emerging Local Plan confirms that the SEP is the third biggest employment centre in</p>

North Norfolk District Council (NNDC) area and the largest dedicated employment site. It is important to note that despite the success of SEP as an employment destination there is currently (i) no vacant available employment space for sale or let; or (ii) any new land available for new employment development at the SEP. As such we are concerned that the emerging Local Plan is not being positively prepared having regard to up-to-date evidence to react to employment space demands in NNDC area.

Emerging Policy E1 confirms that there is no existing space available to develop within the SEP and unlike the two larger employment centres that are the towns of Fakenham and North Walsham no new employment allocations are proposed at the SEP. The SEP is an economic success story within which there is a strong known demand for employment space. This lack of new SEP employment provision in the emerging Local Plan does not match known demand.

Furthermore, the opportunity exists to fund through new development and deliver a new dedicated HGV route into the SEP. This would remove the existing HGV access constraint to the SEP and ensure that all deliveries for the 600 people employed and the 500,000 sq. ft of existing tenanted spaces. The Council is aware that all deliveries currently travel through the centre of Badersfield to access the SEP. This constitutes a neighbour nuisance that in combination with the lack of new employment spaces being delivered through the emerging Local Plan acts as an anchor to the economic success of North Norfolk.

Therefore the Local Plan is failing to create the right conditions to enable and encourage sustainable employment growth across the emerging Plan-period. As such the emerging Local Plan as currently drafted is not positively prepared, is not effective in terms of meeting known demand and the lack of any new provision at the SEP against the clear demand evidence before the Council cannot be justified. As such the emerging Local Plan is unsound having regard to the tests of soundness outlined within paragraph 35 of the NPPF.

By way of background Glavenhill is also now working with representatives of an established media group, an award winning TV studio and a major household name global film studio to explore the delivery of a new permanent film studio on land adjacent the SEP. This speculative development is designed to meet a known demand for film studio space as recently identified by Norfolk County Council, the New Anglia Local Enterprise Partnership (LEP), North Norfolk District Council and Olsberg SPI.

The film studio development would comprise two dedicated film studios (to enable continuous filming), sound stages, lighting rigs and wall/roof anchors, arts and costume space, post production suite, make-up and changing rooms, canteen and staff welfare suites. This is a major speculative development that could also be cross-funded by new housing, employment and care related development at a scale to meet known demand in Badersfield. This mixed use development would go some way to improving the sustainability of the existing settlement and further diversifying the employment based in NNDC area.

As such creating the correct conditions and Local Plan support for continued Class E employment space investment at Badersfield is critical to this project. The current approach as outlined in emerging Local Plan Policy E2 entitled Employment Areas, Enterprise Zones and Former Airbases is too heavily constrained in that it only allows new employment development (such as the film studio proposed) within the Airbase Technical Area (ATA). The land controlled by Glavenhill adjacent the SEP is outside the ATA and as such the emerging Policy is not positively prepared or effective in meeting known employment needs. In this respect Policy E1 confirms that no available employment space actually exists in the ATA and both emerging Policy E1 and Policy E2 confirm that no future employment space is proposed to be allocated adjacent to the ATA (or that the ATA is to be expanded). As such the emerging Local Plan is failing to make sufficient employment provision at the right time and right location to support significant economic growth and innovation in the film sector for which NNDC as funders of the research knows there is a known demand in line with paragraph 8 of the National Planning Policy Framework (NPPF).

Glavenhill through their previous Local Plan submissions, detailed in their Vision and Delivery Document submitted in June 2019, confirms that the village of Badersfield is a sustainable location for planned housing and employment growth. As explained previously the village benefits from a range of core services including convenience retail and post office, place of worship and a public house as well as major employment at the SEP and HMP Bure. Further services such as high

	schools, medical and dental practices, sports grounds, libraries and emergency services are also within a short distance.
Modifications requested	Therefore Glavenhill is seeking amendments to the wording of emerging policies E1 and E2 to allow for new employment growth (including specific references to the film studio project) and enabling residential development at Badersfield. This will enable Glavenhill to raise funding to facilitate delivery of the new film studio project, the new HGV access road to the SEP and linked employment uses. Failure to properly plan for this new economic and enabling growth at Badersfield should not be supported; this is a vibrant community, of work and living, and its continued success should not be hampered by a lack of foresight and proper planning by NNDC.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	My clients would like to attend the Examination in Public in due course to discuss their proposal and better explain the emerging Local Plan changes now sought to facilitate the planned development.
Attachment(s)	

8.2 Employment Areas, Enterprise Zones & Former Airbases

Consultation Point Title	Employment Areas, Enterprise Zones & Former Airbases
Consultation Point Number	8.2
Section of the Plan	8.2.4
ID	LPS656
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	<p>8.2.4 The District contains four former defence establishments which include large areas of brownfield land: Coltishall Airbase, Neatishead (part), Sculthorpe Airbase (part) and West Raynham. Sculthorpe, West Raynham and Coltishall provide significant levels of existing housing but lack the key services and facilities which would make them suitable locations for new housing development. Due to the more isolated location of these sites, any further significant residential development would lead to increased car journeys and would not be in conformity with the settlement hierarchy and approach to sustainable development advocated in this Plan. However, these locations represent an under-used resource within the District and the Council will support their re-use for appropriate employment generating uses. The Policies Map defines the 'technical area' for each site, indicating where development will be focused. The non-technical areas (such as former airfields) are designated as Countryside Policy Area. Sculthorpe Airbase, being best served by the highway network, is considered to offer opportunities for employment uses which would, for environmental or operational reasons, would not be acceptable on designated Employment Areas within settlements.</p> <p>This does not meet the "Effective" test of soundness.</p> <p>If people have to travel there for work, what is the difference between that and living there and travelling out? If additional facilities were built alongside housing, that would create on-site employment, thereby reducing the need for people to travel away from the area at all.</p>
Modifications requested	These areas should be included as mixed use (residential, commercial, light industrial) sites, which would allow them to be in part self-sufficient, reducing pressures on the highways and cutting carbon emissions. The creation of improved public transport networks would be required.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

Policy E 2 Employment Areas, Enterprise Zones & Former Airbases

Consultation Point Title	Employment Areas, Enterprise Zones & Former Airbases
Consultation Point Number	Policy E 2
Section of the Plan	Policy E 2 Employment Areas, Enterprise Zones & Former Airbases
ID	LPS140
Response Date	21/02/2022 15:57:00
Name	Mrs Gemma Harrison
Organisation	Holt Town Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	<p>Holt Town Council wishes to SUPPORT policy E2 as the Town Council welcomes employment land in Holt. The Town Council recognise that it is industry which keeps young families in the town and without the growth in employment opportunities the town of Holt would be a retirement community. The Town Council urges NNDC to explore other suitable employment sites, such as the land adjacent to the A148, which is ripe for development, as it holds little environmental value, and yet would be very attractive to new businesses wishing to set up in the town, as it would have direct access to the A148.</p> <p>In the LDF Holt was referenced to as a principle settlement and was referenced to meeting the employment needs of a wide catchment, including towns of Cromer, Sheringham and a large part of the AONB. This has not changed and Holt Town Cllrs would like to see a new employment area developed adjacent to the A148 in order to encourage new employment growth to the town. The Local Plan has the ability to be more effective for the town of Holt.</p>
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Employment Areas, Enterprise Zones & Former Airbases
Consultation Point Number	Policy E 2
Section of the Plan	Policy E 2 Employment Areas, Enterprise Zones & Former Airbases
ID	LPS532
Response Date	07/03/2022 17:00:00
Name	Mr David Williams
Organisation	PSK Building Surveyors Ltd
Agent Name	Mr

	Alastair Curran
Agent Organisation	Planning Places Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified; It is not consistent with national policy
Explanation	<p>Policy E2 is not consistent with national policy or justified. Policy E2 does not support redevelopment of employment land through mixed-use proposals, in conflict with paragraphs 81 and 124 of the NPPF. Partial redevelopment of aged and underused employment sites would see the protection and/or enhancement of some form of employment use, whilst facilitating upgraded facilities and services.</p> <p>The manufacturing industry is in decline, with manufacturing jobs in the UK falling by 93,000 since 2009 (The Guardian, 2022 – Labour vows to reverse decline in UK manufacturing). This highlights how employment areas, such as those seen in Sheringham, have become less relevant, and are no longer financially viable to retain. Many employment areas are deteriorating and require heavy investment for repairs or replacement buildings. In certain instances, the cost of retaining employment land that is coming to the end of its commercial life is not viable. As such, other avenues to providing efficient employment land need considering and adopting within the plan making process. It is considered there is scope within Policy E2 to accommodate this.</p> <p>The most efficient way of providing employment land that supports growth, innovation, and improved productivity, in line with Paragraph 7 of the NPPF, would be to allow archaic, underused industrial sites to become Mixed Use Allocations where viability is an issue. Where it can be verified through a viability assessment that an Employment Area is not viable to retain or refurbish, a Mixed-Use Allocation could be brought forward. This would facilitate the protection of some form of employment use, whilst acknowledging the changing nature of industry (where typically modern employers use less floor space and more online resources).</p> <p>The revenue from the sale of dwellings, or other uses (such as modern offices or care facilities) on traditional employment sites would facilitate income to upgrade existing buildings/infrastructure, securing the long-term future of the employment land. Equally, with additional finance, new sites could be brought forward with better quality layouts and designs, ensuring new employment sites are better integrated than traditional 'industrial estates.'</p>
Modifications requested	<p>Policy E2 should facilitate the redeveloped of employment land into Mixed Use Allocations where viability is an issue. This would facilitate the protection of some form of employment use, whilst unlocking new investment to allow businesses to expand/modernise as the market demands.</p> <p>The revenue from the sale of dwellings, or other uses (such as modern offices or care facilities) on traditional employment sites would facilitate income to upgrade existing buildings/infrastructure, securing the long-term future of the employment land. Equally, with additional finance, new sites could be brought forward with better quality layouts and designs, ensuring new employment sites are better integrated than traditional 'industrial estates.' This would result in the better long-term protection of gaining employment sites.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)

Justification for appearing at hearing	To verbalise the need and reasoning why employment policies need to be reconsidered in the wider picture, as large area's of employment land in the district are of an gaining and deteriorating state. Equally, to help the Inspector with potential solutions regarding allocations and new policy wording.
Attachment(s)	
Consultation Point Title	Employment Areas, Enterprise Zones & Former Airbases
Consultation Point Number	Policy E 2
Section of the Plan	Policy E 2 Employment Areas, Enterprise Zones & Former Airbases
ID	LPS752
Response Date	04/03/2022 15:07:00
Name	
Organisation	Glavenhill Strategic Land
Agent Name	Mr Philip Atkinson
Agent Organisation	Lanpro Services
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>My client Glavenhill is promoting lower-grade agricultural land at Badersfield for balanced mixed-use development. Badersfield is identified in Policy SS2 of the emerging Local Plan as a Small Growth Village that in combination with other villages in the District will receive some 7.6% of planned housing growth over the emerging Plan-period. This OBJECTION should be read in conjunction with previous representations submitted by Glavenhill relating to land at Badersfield.</p> <p>Glavenhill consider that Badersfield is a good location for housing and employment growth and supports the strategic aim as outlined in paragraph 8.0.1 of the emerging Local Plan that states "Delivering sustainable growth requires that housing growth is matched with improved employment opportunities close to where people live."</p> <p>Glavenhill control land to the north and east of the village of Badersfield adjacent and to the north of Scottow Enterprise Park (SEP). Glavenhill has previously promoted this land for a mix of private and affordable housing, elderly and specialist care, new community services and employment uses at various stages in the emerging Local Plan's evolution. My client is concerned that no new housing or employment growth is proposed to be allocated at Badersfield to support the continued growth and success of the SEP.</p> <p>As the Council is aware the SEP contains some 24.6 ha of existing Class E, B2 and B8 employment space (the latter is heavily constrained by access and movement problems). Policy E1 of the emerging Local Plan confirms that the SEP is the third biggest employment centre in North Norfolk District Council (NNDC) area and the largest dedicated employment site. It is important to note that despite the success of SEP as an employment destination there is currently (i) no vacant available employment space for sale or let; or (ii) any new land available for new employment development at the SEP. As such we are concerned that the emerging Local Plan is not being positively prepared having regard to up-to-date evidence to react to employment space demands in NNDC area.</p> <p>Emerging Policy E1 confirms that there is no existing space available to develop within the SEP and unlike the two larger employment centres that are the towns of Fakenham and North Walsham no new employment allocations are proposed at the SEP. The SEP is an</p>

economic success story within which there is a strong known demand for employment space. This lack of new SEP employment provision in the emerging Local Plan does not match known demand.

Furthermore, the opportunity exists to fund through new development and deliver a new dedicated HGV route into the SEP. This would remove the existing HGV access constraint to the SEP and ensure that all deliveries for the 600 people employed and the 500,000 sq. ft of existing tenanted spaces. The Council is aware that all deliveries currently travel through the centre of Badersfield to access the SEP. This constitutes a neighbour nuisance that in combination with the lack of new employment spaces being delivered through the emerging Local Plan acts as an anchor to the economic success of North Norfolk.

Therefore the Local Plan is failing to create the right conditions to enable and encourage sustainable employment growth across the emerging Plan-period. As such the emerging Local Plan as currently drafted is not positively prepare, is not effective in terms of meeting known demand and the lack of any new provision at the SEP against the clear demand evidence before the Council cannot be justified. As such the emerging Local Plan is unsound having regard to the tests of soundness outlined within paragraph 35 of the NPPF.

By way of background Glavenhill is also now working with representatives of an established media group, an award winning TV studio and a major household name global film studio to explore the delivery of a new permanent film studio on land adjacent the SEP. This speculative development is designed to meet a known demand for film studio space as recently identified by Norfolk County Council, the New Anglia Local Enterprise Partnership (LEP), North Norfolk District Council and Olsberg SPI.

The film studio development would comprise two dedicated film studios (to enable continuous filming), sound stages, lighting rigs and wall/roof anchors, arts and costume space, post production suite, make-up and changing rooms, canteen and staff welfare suites. This is a major speculative development that could also be cross-funded by new housing, employment and care related development at a scale to meet known demand in Badersfield. This mixed use development would go some way to improving the sustainability of the existing settlement and further diversifying the employment based in NNDC area.

As such creating the correct conditions and Local Plan support for continued Class E employment space investment at Badersfield is critical to this project. The current approach as outlined in emerging Local Plan Policy E2 entitled Employment Areas, Enterprise Zones and Former Airbases is too heavily constrained in that it only allows new employment development (such as the film studio proposed) within the Airbase Technical Area (ATA). The land controlled by Glavenhill adjacent the SEP is outside the ATA and as such the emerging Policy is not positively prepared or effective in meeting known employment needs. In this respect Policy E1 confirms that no available employment space actually exists in the ATA and both emerging Policy E1 and Policy E2 confirm that no future employment space is proposed to be allocated adjacent to the ATA (or that the ATA is to be expanded). As such the emerging Local Plan is failing to make sufficient employment provision at the right time and right location to support significant economic growth and innovation in the film sector for which NNDC as funders of the research knows there is a known demand in line with paragraph 8 of the National Planning Policy Framework (NPPF).

Glavenhill through their previous Local Plan submissions, detailed in their Vision and Delivery Document submitted in June 2019, confirms that the village of Badersfield is a sustainable location for planned housing and employment growth. As explained previously the village benefits from a range of core services including convenience retail and post office, place of worship and a public house as well as major employment at the SEP and HMP Bure. Further services such as high schools, medical and dental practices, sports grounds, libraries and emergency services are also within a short distance.

Modifications requested

Therefore Glavenhill is seeking amendments to the wording of emerging policies E1 and E2 to allow for new employment growth (including specific references to the film studio project) and enabling residential development at Badersfield. This will enable Glavenhill to raise funding to facilitate delivery of the new film studio project, the new HGV access road to the SEP and linked employment uses. Failure to properly plan for this new economic and enabling growth at Badersfield should not be supported; this is a vibrant community, of work and living, and its continued success should not be hampered by a lack of foresight and proper planning by NNDC.

Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	My clients would like to attend the Examination in Public in due course to discuss their proposal and better explain the emerging Local Plan changes now sought to facilitate the planned development.
Attachment(s)	

Policy E 3 Employment Development Outside of Employment Areas

Consultation Point Title	Employment Development Outside of Employment Areas
Consultation Point Number	Policy E 3
Section of the Plan	Policy E 3 Employment Development Outside of Employment Areas
ID	LPS63
Response Date	08/02/2022 19:40:49
Name	Dr Bianca Finger-Berry
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	No
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	Designating NW52 as employment land is not in line with this policy on development outside of employment areas, it does not fulfil any of the criteria set out here and should therefore not happen.
Modifications requested	Not designating NW52 as employment land.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Employment Development Outside of Employment Areas
Consultation Point Number	Policy E 3
Section of the Plan	Policy E 3 Employment Development Outside of Employment Areas
ID	LPS350
Response Date	04/03/2022 14:48:46
Name	
Organisation	Wensum Pools Ltd
Agent Name	Mr Alan Presslee
Agent Organisation	Cornerstone Planning Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound	It is not justified; It is not consistent with national policy

<ul style="list-style-type: none"> * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy 	
Explanation	<p>Policy E3: The flexible approach in Policy E3 is welcome, but we contend that sections a) and b) should not be mutually inclusive. In essence, there should be an 'or' and not an 'and' between subparagraphs a) and b).</p> <p>As written, the policy only allows for the expansion of rural businesses if they are unable to find/locate to a site on an allocated employment site. I'm sure this 'sequential' approach is unintended; in any event, it is not sound/appropriate.</p> <p>The policy should reflect the intention of paragraph 84 (Supporting a Prosperous Rural Economy) of the NPPF, which states: "<i>Planning policies and decisions should enable: a) the sustainable growth and expansion of all types of businesses in rural areas, both through conversion of existing buildings and well-designed new building; b) the development and diversification of agricultural and other land-based rural businesses.</i>"</p> <p>There is no doubt that the NPPF supports sustainable growth/expansion 'in situ', and not as a second option to relocation to a designated employment area (an approach that is at odds with support for a diverse and prosperous rural economy). We believe that the policy should be amended to offer clear support for 'in situ' expansion of rural businesses, subject to other policies of the Plan (concerned with highways, landscape, ecology, amenity, etc.).</p> <p>As it stands, Policy E3 is unsound as it neither justified nor consistent with national policy.</p>
Modifications requested	
Appear at examination hearing session(s)? <ul style="list-style-type: none"> * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s) 	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To explain/elaborate
Attachment(s)	
Consultation Point Title	Employment Development Outside of Employment Areas
Consultation Point Number	Policy E 3
Section of the Plan	Policy E 3 Employment Development Outside of Employment Areas
ID	LPS482
Response Date	07/03/2022 18:05:00
Name	
Organisation	Crisp Malting Group
Agent Name	Mr Jake Lambert
Agent Organisation	Bidwells
Do you consider the plan to be Legally Compliant? <ul style="list-style-type: none"> * Yes * No 	No
Has the duty to cooperate been met? <ul style="list-style-type: none"> * Yes * No 	Yes
Do you consider the plan to be Sound? <ul style="list-style-type: none"> * Yes * No 	No
Reason(s) not Sound <ul style="list-style-type: none"> * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy 	It is not effective; It is not justified
Explanation	<p><u>This policy is unsound as it is not effective.</u></p> <p>CMG are a major economic driver for North Norfolk. Over 280 local farmers produce barley, wheat and rye for Crisp in Norfolk. In addition,</p>

	<p>200 businesses across East Anglia supply goods and services to Crisp, 80 of which are within the NR postcode. CMG's facility in Ryburgh has 115 workers working on or from the site and it is the headquarters of an international business with turnover of approximately £200 million, 40% of which is generated through exports. In addition, CMG purchases approximately £30 million of raw barley tonnage from Norfolk farms annually, highlighting the significance of CMG within the local rural economy.</p> <p>CMG's Ryburgh site is located outside of a designated employment area, so it is critical that policies in the Local Plan enable sites like this to thrive, in accordance with Paragraph 84 of the NPPF.</p> <p>To assist with this, criterion 1c of Policy E3 should be deleted. Paragraph 111 of the NPPF states that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residential cumulative impacts on the road network would be severe. Criterion 1c duplicates Paragraph 111, rendering it ineffectual, so it should be deleted to maintain soundness in relation to Paragraph 35(c) of the NPPF.</p> <p>CMG wishes to express support for criterion 1a and 1b of Policy E3, which complies with Paragraph 84 of the NPPF by encouraging the growth and continued prosperity of the rural economy.</p>
Modifications requested	Criterion 1c of Policy E3 should be amended as detailed in Question 5.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

8.4 Retail & Town Centre Development

Consultation Point Title	Retail & Town Centre Development
Consultation Point Number	8.4
Section of the Plan	8.4.4.
ID	LPS191
Response Date	23/02/2022 15:41:00
Name	Greg Hewitt
Organisation	Wells Town Council
Agent Name	Andrea Long
Agent Organisation	Compasspoint Planning and Rural Consultants
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	Paragraph 8.4.4 (page 102), of the Local Plan refers to 'disproportionately large-scale development in these smaller towns may have an adverse impact on their character and thus diminish their attractiveness as tourist destinations. Furthermore, such developments may encourage unnecessary car journeys from the larger towns. Consequently, it is considered that developments here should be smaller in scale and should be designed to meet identified needs in the town and its immediate surroundings.'
Modifications requested	This paragraph should be amended to include reference to the impact of heavy lorries on the condition of the B1105 and generally of traffic management.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	Wells Town Council wishes to have the opportunity to make/amplify its points to the Inspector
Attachment(s)	

Policy E 4 Retail & Town Centre Development

Consultation Point Title	Retail & Town Centre Development
Consultation Point Number	Policy E 4
Section of the Plan	Policy E 4 Retail & Town Centre Development
ID	LPS172
Response Date	23/02/2022 14:41:27
Name	Miss Naomi Chamberlain
Organisation	Norfolk County Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	The County Council supports the inclusion of a Policy for retail and town centres and the objectives of the policy. This policy can work successfully alongside the County Councils Market Town Network Improvement Strategies produced for North Walsham and Fakenham focussing on transport issues including town centre improvements for all modes of transport. This continues with a town centre first approach in line with the NPPF, for retail, leisure, and cultural uses.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

8.6 New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions

Consultation Point Title	New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions
Consultation Point Number	8.6
Section of the Plan	8.6, 8.7, 8.8
ID	LPS230
Response Date	24/02/2022 11:31:00
Name	Ms Sarah Mitchell
Organisation	RSPB
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	We do actually find these policies to be effective, but thought including cross-referencing with the GIRAMs work here would be of benefit.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

Policy E 6 New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites

Consultation Point Title	New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites
Consultation Point Number	Policy E 6
Section of the Plan	Policy E 6 New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites
ID	LPS74
Response Date	04/03/2022 09:11:53
Name	Ms Emma Stannard
Organisation	Blakeney Hotel
Agent Name	Mr John Long
Agent Organisation	John Long Planning Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	<p>Blakeney Hotel has a concern over the application of Policy E 6 and its potential impact on the Hotel's prospective proposals to expand and provide more tourist accommodation at the Hotel. Whilst it is accepted that the Policy is supportive of proposals for the expansion of an existing business, the Policy as written specifically requires Hotel development to demonstrate compliance with the sequential approach in accordance with national and local retail policies (E 6 – Section 2). The Policy is not totally clear whether this part is applicable to just 'new' hotels; or to 'all' hotel development including existing hotel business expansion proposals. It is noted that the Policy's reasoned justification/supporting text suggests that the extension to existing tourist accommodation section relates to extensions of specific types of tourism accommodation, but does not specifically mention hotel accommodation. Blakeney Hotel assumes that hotels are included within the definition of tourism accommodation; and therefore that the part of the policy relating to Hotel development (E 6 - Section 2) is for proposals for 'new' hotels only, and would not apply to extensions of existing hotels. However, it is not totally clear in the Policy and a small change to the Policy would clarify the situation.</p> <p>If Policy E 6 – Section 2 is applicable to all hotel development (new hotels and existing hotel expansion proposals), it would mean a proposal at the Blakeney Hotel for additional guest bedrooms, would have to comply with Policy ECN 4 Retail and Town Centres and require the sequential test to be applied and demonstrate that there are no available sites in nearby main town centres or edge of town centres. This is not practical, viable or feasible for Blakeney Hotel.</p> <p>Blakeney Hotel are not certain that this is the Policy's intention and would be alarmed if it was, as it would effectively restrict the Hotel's (and many other hotels not in town centre locations) ability to grow and expand to meet business and visitor needs. The Policy would therefore fail the Justified Soundness Test. However, it can be easily remedied with a minor clarification.</p>
Modifications requested	Blakeney Hotel request that the Policy is amended to confirm that the Section 2 and the application of the sequential test is for proposal for new hotels only; and that the expansion of existing hotel businesses to provide additional tourism accommodation is exempt from the

	<p>sequential test, to ensure that existing hotel businesses are able to grow and expand to meet business and visitor needs:</p> <p>"2. Where the development is for a <u>new</u> hotel, this should demonstrate compliance with the sequential approach in accordance with national retail policy and Policy E 4 'Retail & Town Centre Development'."</p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To support the Hotel's comments and participate in the discussions concerning tourism accommodation.
Attachment(s)	
Consultation Point Title	New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites
Consultation Point Number	Policy E 6
Section of the Plan	Policy E 6 New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites
ID	LPS82
Response Date	04/03/2022 10:40:00
Name	Mr Paul Timewell
Organisation	Blue Sky Leisure
Agent Name	Mr John Long
Agent Organisation	John Long Planning Ltd
<p>Do you consider the plan to be Legally Compliant? * Yes * No</p>	Yes
<p>Has the duty to cooperate been met? * Yes * No</p>	Yes
<p>Do you consider the plan to be Sound? * Yes * No</p>	No
<p>Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy</p>	It is not effective
Explanation	<p>Blue Sky Leisure can support Policy E 6 particularly point b, the support for static holiday caravans and holiday lodge proposals where they are for a replacement static caravan site or holiday lodge accommodation which would result in the removal of an existing clifftop static caravan site or the relocation of existing provision which is within the Coastal Change Management Area or Environment Agency Flood Risk Zone 3.</p> <p>However, Blue Sky Leisure suggest that for clarity Policy E 6 Section 3 should refer to the extensions to exiting tourist accommodation, static caravans and holiday lodges '<u>sites</u>', which is assumed to be the intention and as implied by the policy title, rather than the extensions to individual static caravan and lodge 'units'. It is assumed that extensions to individual units, such as verandas/decking will be dealt with by the usual development management policies.</p>
Modifications requested	<p>Blue Sky Leisure suggests that the policy E6 section 3 is amended to refer to extension to static caravans and lodges sites:</p> <ol style="list-style-type: none"> 1 <i>Business expansion and extensions to existing tourist accommodation, static caravan <u>sites</u> and holiday lodges <u>sites</u> will be supported where:</i> 2 <i>the proposal demonstrates measurable biodiversity net-gains; and,</i> 3 <i>the proposal would not have an adverse impact upon:</i>

	<p>4 <i>the defined special qualities of the Area of Outstanding Natural Beauty;</i></p> <p>5 <i>the key characteristics and valued features of the defined Landscape;</i></p> <p>iii. <i>residential amenity; and,</i></p> <p>1 <i>the safety and operation of the local highway network.</i></p> <p>2 <i>All proposals within a designated Coastal Change Management Area shall demonstrate through a Coastal Erosion Vulnerability Assessment that the proposal will not result in an increased risk to life or to property.</i></p>
<p>Appear at examination hearing session(s)?</p> <p>* No, I do not wish to participate in examination hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To further discuss Blue Sky Leisure's challenges and the positive support the Local Plan should be providing to tourism accommodation business in North Norfolk in response to climate change, coastal adaptation and the covid 19 pandemic.
Attachment(s)	
Consultation Point Title	New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites
Consultation Point Number	Policy E 6
Section of the Plan	Policy E 6 New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites
ID	LPS108
Response Date	18/02/2022 15:36:23
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
<p>Do you consider the plan to be Legally Compliant?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Has the duty to cooperate been met?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Do you consider the plan to be Sound?</p> <p>* Yes</p> <p>* No</p>	No
<p>Reason(s) not Sound</p> <p>* It is not positively prepared</p> <p>* It is not effective</p> <p>* It is not justified</p> <p>* It is not consistent with national policy</p>	It is not justified
Explanation	New proposals/ expansion of existing tourist accommodation, static caravans and holiday lodges will be supported - theNorth Norfolk economy is at risk of being overly dependent on the visitor economy and surely we shd look elsewhere for economic growth. Is this sustainable tourism? This policy mentions the impact on teh AONB but not specifically the other protected sites such as RAMSARs and SSSIs.
Modifications requested	Proposals for new tourist accommodation or extensions of existing should be limited and weighed against other opportunities for economic growth, and the impact on designated habitat sites assessed and mitigated.
<p>Appear at examination hearing session(s)?</p> <p>* No, I do not wish to participate in examination hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

Consultation Point Title	New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites
Consultation Point Number	Policy E 6
Section of the Plan	Policy E6 New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites
ID	LPS296
Response Date	03/03/2022 09:00:47
Name	
Organisation	White Lodge (Norwich) Ltd
Agent Name	Mr Sam Hazell
Agent Organisation	Lawson Planning Partnership Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	<p>SEE ATTACHED FILE</p> <p>The Plan is unsound when considered against the related tests set out in paragraph 35 of the NPPF (2021) as explained below.</p> <ul style="list-style-type: none"> • Not Positively prepared– the proposed Small Growth Village Strategy approach will not provide enough homes of the right type in the right places for a growing population to meet the area’s needs (including affordable) and could frustrate the delivery of sustainable housing development. • Not Justified– the strategy is not appropriate, taking into account the reasonable alternative to allocate suitable and available sites in Small Growth Villages, and is not based on proportionate evidence. • Not Effective– the plan does not provide landowners/ developers with sufficient planning certainty and will not therefore, deliver the required development, including affordable housing, in Small Growth Villages over the plan period. • Not Consistent with National Policy– The proposed Small Growth Village Strategy approach will not deliver sufficient homes, nor support community vitality & services viability, it will not therefore enable the delivery of sustainable development in rural areas. This approach would run counter to para 78 which states, “In rural areas, planning policies and decisions should be responsive to local circumstances and support housing development that reflect local needs”, and para 79, “To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.” <p>We OBJECT to the approach of policy E6 which is overly restrictive by only supporting proposals for new tourist accommodation where the site is within the boundary of a selected settlement, as set out in detail in the representations letter dated 1st March 2022, attached.</p>
Modifications requested	<p>SEE ATTACHED FILE</p> <p>Tourism is an important component of the District’s economy. In order to support rural prosperity and to make the Plan sound, the wording of the Policy E6 criteria 1a should be amended and proposals supported where:</p>

	<ul style="list-style-type: none"> the site is within the boundary of a Selected Settlement, or <u>the proposals are small-scale and well-related to a Selected Settlement or established tourism attraction</u>; or.....,
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	In accordance with our legal right to appear before and be heard by the inspector at the hearing. We wish to elaborate on our representations, which set out the changes we have requested to the strategy approach and the identified interrelated policies that are required to make the plan sound.
Attachment(s)	176_HighKelling_Reg19.Reps.Letter.FINAL_1.3.22.pdf FINAL LPPRepslett WhiteLodge NNLP 18.06.19.pdf
Consultation Point Title	New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites
Consultation Point Number	Policy E 6
Section of the Plan	Policy E 6 New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites
ID	LPS345
Response Date	04/03/2022 14:41:30
Name	Miss Natalie Beal
Organisation	Broads Authority
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Comment This section does not mention the Broads. The type of development could impact the setting of the Broads. This issue can be addressed by referring to the setting of the Broads. at policy. Relevant part of NPPF The Broads and the setting of the Broads is protected at NPPF paragraph 176
Modifications requested	Proposed change E6 1 d i: the defined special qualities of the Area of Outstanding Natural Beauty and the Broads. E6 3 b i: the defined special qualities of the Area of Outstanding Natural Beauty and the Broads.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites

Consultation Point Number	Policy E 6
Section of the Plan	Policy E 6 New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites
ID	LPS351
Response Date	04/03/2022 15:32:00
Name	
Organisation	Wensum Pools Ltd
Agent Name	Mr Alan Presslee
Agent Organisation	Cornerstone Planning Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified; It is not consistent with national policy
Explanation	<p><u>Policy E6:</u></p> <p>We contend that Policy E6 is unnecessarily constraining. Paragraph 84 (Supporting a Prosperous Rural Economy) of the NPPF, states: <i>“Planning policies and decisions should enable [inter alia]: c) sustainable rural tourism and leisure developments which respect the character of the countryside.”</i></p> <p>“Sustainable” does not mean that such should all be restricted to sites within a selected settlement, or just involve the replacement of an existing holiday caravan or lodge. The NPPF does not treat “sustainable rural tourism” development in the same way it treats housing; nor should the Local Plan. Indeed, it acknowledges as much at paragraph 8.6.8, when noting: <i>“Proposals that are not for holiday accommodation will be treated as permanent dwellings and determined under relevant policies of this Plan.”</i></p> <p>We believe that the policy should be amended to offer clear support for sustainable rural tourism, in accordance with the NPPF. Not unconstrained/uncontrolled development; but not limited to designated settlements either. It’s acknowledged that such development should “respect the character of the countryside” (as indicated by the NPPF) and so consider that criteria d) i - iv of Policy E6 (and other policies of the Plan concerned with highways, landscape, ecology, amenity, etc.) are appropriate in determining such.</p> <p>As it stands, Policy E6 is unsound as it neither justified nor consistent with national policy.</p>
Modifications requested	As Above
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To explain/elaborate
Attachment(s)	
Consultation Point Title	New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites
Consultation Point Number	Policy E 6
Section of the Plan	Policy E 6 New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites
ID	LPS332

Response Date	04/03/2022 12:45:00
Name	Mr Archie Soames
Organisation	The Barsham Estate
Agent Name	Miss Charlotte Hatton
Agent Organisation	DPP
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not consistent with national policy
Explanation	SEE ATTACHED FILE
Modifications requested	SEE ATTACHED FILE
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	Reg 19 response.pdf
Consultation Point Title	New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites
Consultation Point Number	Policy E 6
Section of the Plan	Policy E 6 New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites
ID	LPS376
Response Date	07/03/2022 11:08:00
Name	
Organisation	Holkham Estate
Agent Name	Mr Garth Hanlon
Agent Organisation	Savills (UK) Limited
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified; It is not consistent with national policy
Explanation	Introduction

Savills (UK) Ltd is instructed by The Holkham Estate to make the necessary and relevant representations to the Regulation 19 version of the Local Plan for North Norfolk. As a major landowner within the District, it is important to engage with the Development Plan process and as such, the representations are submitted to ensure that the Plan is positively prepared, justified, effective and consistent with national policy within the NPPF. This submission is in relation to proposed policy E6.

Representations

This representation is an objection to Policy E6 which should be amended to address the shortcomings set out below in relation to the numbered sections of the proposed policy. In the context of these representations, we do not consider that the policy is justified nor consistent with national policy.

Policy E6 New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites

The policy which seeks to govern proposals for new tourist accommodation is unduly restrictive given the expectation in National Planning Policy Framework para 84 (c) that sustainable rural tourism and leisure developments which respect the character of the countryside will be enabled. The policy as drafted is too restrictive as it limits development onerously. Policy SS 2 seeks to encourage appropriate development in the rural areas in accordance with the NPPF, which calls for development to be limited and to minimize adverse effects on designated areas (para 176).

Although the text of the plan at 8.6 explains that existing businesses will be able to expand and new-build tourism accommodation will be allowed 'in appropriate locations' this fails to specifically recognise the locational requirements for some types of hotel development. The text goes on to explain that existing businesses can expand and existing buildings can be reused but that new development will not normally be permitted. The strategic policy of the plan to protect the countryside is Policy SS 2 and there is no need for Policy E6 to seek to reaffirm it.

The proposed Policy E6 should be revised to address the following points –

- 1 in relation to Policy E6.1.a.

The requirement for a site to be within a Selected Settlement rules out many attractive and sustainable opportunities for use, reuse and expansion of existing tourism locations

Recommend insert new section c –

Special circumstances relating to the location of the site or the nature of the proposed development are shown to justify development in the countryside having regard to paragraph 176 of the NPPF and other material considerations

Renumber sections c and d accordingly.

- 1 in relation to Policy E6 1.b

The policy says this is specifically relevant to proposals for new tourist accommodation but the opportunity to provide new tourist accommodation under this proposed provision is limited to the opportunity to replace an existing facility. The test should be the acceptability of the impact of development, including new development.

- 1 In relation to E6 1.d

Even within the limited scope of the policy as drafted, the wording of this criterion prevents development which might offer significant benefits in terms of removing current risks, harms and impacts that outweigh a new significant impact. The wording should be changed to require proposals to evidence an overall net benefit from the development in order to be permitted.

Recommend insert additional wording –

The proposal is for replacement or expansion of static caravan or holiday lodge accommodation including proposed relocation and new sites and

- 1 the proposal demonstrates measurable biodiversity net gains; and,
- 2 the proposal offers overriding advantages in terms of Coastal Management Change or Flood risk objectives, social, economic or environmental benefits sufficient to outweigh any significant detrimental impact upon:
- 3 the defined special qualities of the Area of Outstanding Natural Beauty;

	<p>4 the key characteristics and valued features of the defined Landscape Type;</p> <p>iii. residential amenity; and,</p> <p>1 the safety and operation of the local highway network.</p> <p>1 In relation to Policy E6 2</p> <p>This proposed provision is not clearly thought through and creates unreasonable barriers to tourism-based hotel development outside town or settlement centre locations. According to the definition of Main Town Centre Uses in the NPPF, hotel development is clearly a separate use from 'retail development'. The NPPF encourages hotel provision to be made in sustainable locations at settlement centres but there may be a strong business case for a hotel or the expansion of an existing hotel in a rural area due to the attraction of the location, the quality of the facility or its proximity to a particular setting or recreational opportunity.</p> <p>It is inappropriate to require a retail sequential test and specifically, the reference to proposed Policy E4 'Retail & Town Centre Development' which has no relevance to hotel proposals. The policy considerations should be cast wider in terms of special circumstances for development beyond town centres, to recognise the social, environmental and economic benefits of delivering accommodation and visitor facilities close to the areas where tourists wish to visit and spend their time. This section of the proposed policy should set out relevant criteria in terms of measuring the social, environmental and economic impacts and benefits of the proposal.</p> <p>Recommend rewording –</p> <p>2.i) Where the development is for a hotel within an existing settlement it is located in the town centre where a suitable site is available or</p> <p>2.ii) Where the development is for a hotel in a countryside location the application evidences overriding social, economic or environmental benefits sufficient to outweigh any significant detriment to the natural and local environment, including any formal designations in this plan.</p> <p>1 In relation to E6 3</p> <p>This section of the policy lists potential adverse impacts arising from a proposal but does not allow for exceptional circumstances or the opportunity for specific benefits or mitigations to outweigh an element of harm. The criteria should recognise that whilst proposals can give rise to harm (adverse impact) to any of the aspects set out in the policy such harm can nevertheless be modest, mitigated or outweighed by the overall advantages of the proposal. The policy should outline the matters of concern that the Council expects to be addressed in any planning application and recognise the relevance of a robust business case for development of a particular type in a particular location.</p> <p>Recommend rewording –</p> <p>3 b. the application evidences overriding social, economic or environmental benefits sufficient to outweigh any significant detriment to the natural and local environment, including</p> <p>1 any formal designations in this plan</p> <p>2 the defined qualities of the Area of Outstanding Natural Beauty</p> <ul style="list-style-type: none"> • the key characteristics and valued features of the defined landscape <p>1 residential amenity; and</p> <p>2 the safety and operation of the local highway network.</p>
<p>Modifications requested</p>	<p>1 in relation to Policy E6.1.a.</p> <p>The requirement for a site to be within a Selected Settlement rules out many attractive and sustainable opportunities for use, reuse and expansion of existing tourism locations</p> <p>Recommend insert new section c –</p> <p>Special circumstances relating to the location of the site or the nature of the proposed development are shown to justify development in the countryside having regard to paragraph 176 of the NPPF and other material considerations</p> <p>Renumber sections c and d accordingly.</p> <p>1 in relation to Policy E6 1.b</p>

The policy says this is specifically relevant to proposals for new tourist accommodation but the opportunity to provide new tourist accommodation under this proposed provision is limited to the opportunity to replace an existing facility. The test should be the acceptability of the impact of development, including new development.

1 In relation to E6 1.d

Even within the limited scope of the policy as drafted, the wording of this criterion prevents development which might offer significant benefits in terms of removing current risks, harms and impacts that outweigh a new significant impact. The wording should be changed to require proposals to evidence an overall net benefit from the development in order to be permitted.

Recommend insert additional wording –

The proposal is for replacement or expansion of static caravan or holiday lodge accommodation including proposed relocation and new sites and

- 1 **the proposal demonstrates measurable biodiversity net gains; and,**
- 2 **the proposal offers overriding advantages in terms of Coastal Management Change or Flood risk objectives, social, economic or environmental benefits sufficient to outweigh any significant detrimental impact upon:**
- 3 **the defined special qualities of the Area of Outstanding Natural Beauty;**
- 4 **the key characteristics and valued features of the defined Landscape Type;**

iii. residential amenity; and,

- 1 **the safety and operation of the local highway network.**

1 In relation to Policy E6 2

This proposed provision is not clearly thought through and creates unreasonable barriers to tourism-based hotel development outside town or settlement centre locations. According to the definition of Main Town Centre Uses in the NPPF, hotel development is clearly a separate use from 'retail development'. The NPPF encourages hotel provision to be made in sustainable locations at settlement centres but there may be a strong business case for a hotel or the expansion of an existing hotel in a rural area due to the attraction of the location, the quality of the facility or its proximity to a particular setting or recreational opportunity.

It is inappropriate to require a retail sequential test and specifically, the reference to proposed Policy E4 'Retail & Town Centre Development' which has no relevance to hotel proposals. The policy considerations should be cast wider in terms of special circumstances for development beyond town centres, to recognise the social, environmental and economic benefits of delivering accommodation and visitor facilities close to the areas where tourists wish to visit and spend their time. This section of the proposed policy should set out relevant criteria in terms of measuring the social, environmental and economic impacts and benefits of the proposal.

Recommend rewording –

2.i) Where the development is for a hotel within an existing settlement it is located in the town centre where a suitable site is available or

2.ii) Where the development is for a hotel in a countryside location the application evidences overriding social, economic or environmental benefits sufficient to outweigh any significant detriment to the natural and local environment, including any formal designations in this plan.

1 In relation to E6 3

This section of the policy lists potential adverse impacts arising from a proposal but does not allow for exceptional circumstances or the opportunity for specific benefits or mitigations to outweigh an element of harm. The criteria should recognise that whilst proposals can give rise to harm (adverse impact) to any of the aspects set out in the policy such harm can nevertheless be modest, mitigated or outweighed by the overall advantages of the proposal. The policy should outline the matters of concern that the Council expects to be addressed in any planning application and recognise the relevance of a robust business case for development of a particular type in a particular location.

Recommend rewording –

	<p>3 b. the application evidences overriding social, economic or environmental benefits sufficient to outweigh any significant detriment to the natural and local environment, including</p> <ol style="list-style-type: none"> 1 any formal designations in this plan 2 the defined qualities of the Area of Outstanding Natural Beauty <ul style="list-style-type: none"> • the key characteristics and valued features of the defined landscape <ol style="list-style-type: none"> 1 residential amenity; and 2 the safety and operation of the local highway network.
<p>Appear at examination hearing session(s)?</p> <p>* No, I do not wish to participate in examination hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites
Consultation Point Number	Policy E 6
Section of the Plan	Policy E 6 New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites
ID	LPS412
Response Date	07/03/2022 13:10:00
Name	
Organisation	Bidwells LLP
Agent Name	Mr Iain Hill
Agent Organisation	Bidwells
<p>Do you consider the plan to be Legally Compliant?</p> <p>* Yes</p> <p>* No</p>	
<p>Has the duty to cooperate been met?</p> <p>* Yes</p> <p>* No</p>	
<p>Do you consider the plan to be Sound?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Reason(s) not Sound</p> <p>* It is not positively prepared</p> <p>* It is not effective</p> <p>* It is not justified</p> <p>* It is not consistent with national policy</p>	It is not effective It is not consistent with national policy
Explanation	<p>We write on behalf of the owners of The Pigs, Edgefield (TBE). TBE have extensive experience of the tourist/leisure trade; owning a range of facilities in Norfolk, including: Byfords, Holt, The Ffolkes, Hillington, The Assembly House, Norwich and Sponge, Holt. The company employs approximately 300 people and has an annual turnover of £10 million.</p> <p>By way of background, The Pigs was purchased in 2006 and has been transformed from a 'run down' public house into a thriving leisure facility. As well as a restaurant, The Pigs has responded to market demand by expanding to provide a range of facilities including, a spa, luxury accommodation and a children's play area. This has been achieved through financial investment in the region of £5million.</p> <p>The improvements to The Pigs have made a significant contribution to the local economy; generating tourism and jobs, as well as expenditure in local trades.</p> <p>The Pigs, like any other business, needs to continually evolve to ensure it meets the ever-changing requirements of its market and, therefore, remains competitive.</p> <p>In recent years, in addition to those facilities provided at locations such as The Pigs, the tourist sector has seen an increased demand for small/medium scale self-catering accommodation i.e. cabins / lodges,</p>

in rural locations, such as North Norfolk. The following list provides examples of such facilities which are located both within the locality and further afield.

- Barnsdale Lodge & Rutland Retreats

<http://www.barnsdalelodge.co.uk/pages/home>

- Fritton Lake

<https://www.somerleyton.co.uk/fritton-lake/>

- Norfolk Woods. Pentney, West Norfolk

<https://www.darwinescapes.co.uk/parks/norfolk-woods-resort-spa/about-us/>

These facilities, which are continuing to evolve, are unique in that as well as providing self-catering accommodation, provide residents with the opportunity to utilise other facilities available within the wider site. For example, people staying in the cabins / lodges are able to access a range of leisure facilities, such as bars, spa and restaurants, provided by the associated facility, as well as benefitting from services such as a concierge.

In this regard, it is essential that any planning policy relating to the development of tourist related facilities provides sufficient flexibility to allow businesses to respond to changes in market demand.

Therefore, whilst the general principle of Policy E6 is advocated, notably the support, in principle, for the development of new build tourist accommodation and the expansion and extension to existing tourist facilities, it is requested that changes are made to the policy to ensure that it is consistent with, and sufficiently flexible to respond to, market requirements and conforms with the National Planning Policy Framework (NPPF) and therefore 'sound'.

As drafted, Policy E6 contains a presumption against new build tourist accommodation in the countryside, unless it relates to the expansion of an existing business. As detailed above, the nature of the tourist sector is changing with, amongst other things, increasing demand for self-catering accommodation in rural areas. Whilst the example of the facilities provided above demonstrates that there are clear links with existing businesses, there will potentially be certain cases where new business ventures seek to locate in a rural area. As drafted the Policy precludes this.

It is, therefore, suggested that rather than excluding new build tourist accommodation in the countryside, Policy E6 should recognise that applications for new build tourist accommodation, which is not linked to an existing business, will be permitted in the countryside where it can be demonstrated that the proposal would not have a detrimental impact on the environment.

As well as providing more flexibility, this approach is considered to be a more robust means of assessing the suitability of a proposal. For example, as drafted, the policy would allow, in principle, the expansion of an existing businesses in a rural area, whilst precluding a new development in the same location, even where the two proposals were essentially identical in terms of the scale and quantum of development and perceived impact on the environment.

In addition, the proposed wording of Policy E6 is, as drafted, considered to be inconsistent with paragraph 84 of the NPPF which relates to 'supporting a prosperous rural economy'. More specifically, whilst paragraph 84 a) states that planning policies should enable the sustainable growth and expansion of all types of business in rural areas, through both the conversion of existing buildings and well-designed new buildings, it goes on to state that (paragraph 84 c) that planning policies should also enable '*sustainable rural tourism and leisure developments which respect the character of the countryside*'.

It does not state anywhere in the NPPF that growth within the countryside, particularly in relation to rural tourism and leisure developments, should be restricted to that associated with the expansion of existing businesses.

The flexibility for new tourist accommodation to be developed in the countryside, irrespective as to whether it relates to an existing business, is incorporated in the relevant policies of a number of other Local Plans which have either recently been, or are about to be, adopted.

For example, the recently adopted Waveney Local Plan (March 2019) allows, in principle, the development of a range of tourist related accommodation, including new self-catering tourist accommodation, in the countryside, irrespective of whether it relates to the expansion of an existing business. (Policy WLP8.15 – New Self Catering Tourist Accommodation).

To regulate tourist related development in the Countryside and ensure that it will not have an adverse impact on the locations in which it is proposed, a threshold relating to the scale of development has been adopted. The scale states that:

- small scale development (10 or fewer units) can be accommodated anywhere;
- medium scale development (11-79 units) is required to have good access to A or B roads; &
- large Scale developments (80+) is required to be close to market towns.

Accordingly, rather than preclude development of new tourist related development in the countryside that is not linked to an existing business, the policy supports all types of tourist related development, but adopts a threshold to ensure it is of an appropriate scale to its location.

In addition, Breckland District Council's Local Plan policy on Tourism (Policy EC 07) (November 2019), states that:

"Proposals for new tourism related development attracting a significant number of visitors should be located within, or be accessible to, the market towns. Smaller development proposals involving new tourism related development should be of a suitable scale and type to protect the character of the townscape and landscape within which they are situated."

~~It is, in a similar manner to Waveney District Council, evident that Breckland District Council have, rather than preclude tourist related development, sought to promote such development provided it can be demonstrated that it would be of an appropriate scale to its location and would not have an adverse impact on the environment. The approach adopted by both Councils is considered to be in accordance with the NPPF and recognises the need of both existing and new business ventures to be able to develop in rural areas, subject to consideration of other planning matters.~~

It is, in a similar manner to Waveney District Council, evident that Breckland District Council have, rather than preclude tourist related development, sought to promote such development provided it can be demonstrated that it would be of an appropriate scale to its location and would not have an adverse impact on the environment. The approach adopted by both Councils is considered to be in accordance with the NPPF and recognises the need of both existing and new business ventures to be able to develop in rural areas, subject to consideration of other planning matters.

In addition, the policy is also inconsistent with draft Policy SS 2 Development in the Countryside and Policy E8 New Tourist Attractions & Extensions which, subject to the satisfaction of certain criteria, permits new build facilities for tourist attractions in designated countryside. It is, in our view, perverse to adopt a different approach in relation to tourist accommodation and tourist attractions.

It is, therefore, recommended that the policy is revised in order to ensure that the policy is consistent with the NPPF and, crucially, that the requirements of the tourism sector are met, allowing the economic benefits detailed at paragraph 10.45 to be realised.

Modifications requested

To make the policy sound the following amendments are proposed:

**Policy E6
New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites**

1 Proposals for new tourist accommodation, static holiday caravans and holiday lodges(1) will be supported where:

a, ~~the site is within the boundary of a Selected Settlement~~ *The proposal would enhance the tourism offer, benefit the local economy and be of a suitable scale and type for its location,*

b. *The development is of a scale where the environment and infrastructure of the location can accommodate the visitor impact; or*

c. *the proposal is for a replacement static caravan site or holiday lodge accommodation which would result in the removal of an existing clifftop static caravan site or the relocation of existing provision which is within the Coastal Change Management Area or Environment Agency Flood Risk Zone 3;(2) and,*

d, *the proposal demonstrates measurable biodiversity net-gains; and,*

e, *the proposal would not have a significant detrimental impact upon:*

	<ol style="list-style-type: none"> 1 the defined special qualities of the Area of Outstanding Natural Beauty; 2 the key characteristics and valued features of the defined Landscape Type; <ol style="list-style-type: none"> iii. residential amenity; and, 1 the safety and operation of the local highway network. 2 Where the development is for a hotel, this should demonstrate compliance with the sequential approach in accordance with national retail policy and Policy E 4 'Retail & Town Centre Development'. 3 Business expansion and extensions to existing tourist accommodation, static caravans and holiday lodges will be supported where: 4 the proposal demonstrates measurable biodiversity net-gains; and, 5 the proposal would not have an adverse impact upon: 6 the defined special qualities of the Area of Outstanding Natural Beauty; 7 the key characteristics and valued features of the defined Landscape; <ol style="list-style-type: none"> iii. residential amenity; and, 1 the safety and operation of the local highway network <p>All proposals within a designated Coastal Change Management Area shall demonstrate through a Coastal Erosion Vulnerability Assessment that the proposal will not result in an increased risk to life or to property.</p> <ol style="list-style-type: none"> 1 Including buildings such as cabins and guest houses. 2 Taking into account the equivalent risk from all sources of flooding. <p>Deleted Text - Strikethrough Italics Text – Proposed Amendment</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	I reserve the right to appear prior to publication of the draft agendas that will set out the Inspector's matters and questions to form the basis of the discussions at the Hearings. The intention to appear is to seek to ensure that the Policy can be made sound, if required.
Attachment(s)	
Consultation Point Title	New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites
Consultation Point Number	Policy E 6
Section of the Plan	Policy E 6 New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites
ID	LPS483
Response Date	07/03/2022 18:12:17
Name	Mr Andrew Hird
Organisation	Woodlands Caravan Site (Trimingham) Ltd
Agent Name	Mr Alastair Curran
Agent Organisation	Planning Places Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No

Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective/it is not positively prepared
Explanation	<p>It is considered that Policy E6 could be more effective in terms of facilitating tourist development. North Norfolk relies upon the tourism industry for its local economy:</p> <p><i>North Norfolk's visitor economy is currently worth £470m pa (2014 figures, Destination Research), with 546k staying trips and 7.5m day trips. Tourism-related employment is 10.5k jobs, with 7.6k FTEs – 26% of all employment in the district.</i></p> <p><i>Tourism growth in the UK is currently running at 4% (average overall growth is 2.5%) but in Norfolk it is 8%. To continue that trend would mean an additional £38m to the district's visitor economy and another 840 jobs pa. [Information provided by Visit North Norfolk].</i></p> <p>Policy E6 will not support proposals that will have an adverse impact upon Areas of Outstanding National Beauty (AONB), key characteristics of the defined landscape, or other considerations. It is considered that the intrinsic landscape features of North Norfolk which are part of the attraction for holiday makers, should be protected, however existing holiday sites are generally located in sensitive locations.</p> <p>Although the policy appears to be supportive, realistically Policy E6 will provide limited support to most existing tourism businesses. Unless the policy allows for the planning balance (provision of public benefits to outweigh any limited harm to the landscape), or require specific improvements, such as 'enhanced landscaping' most sites would not be able to expand through Policy E6. As such, it is considered that the wording around Policy E6 be revised to make greater acknowledgement of the local issues and provide support for how necessary development could be facilitated</p>
Modifications requested	<p>A potential solution would be for the policy to allow the expansion of existing sites, through nearby, but not necessarily adjoining, land. Instead allowing for one static caravan site to exist, but be located in different locations, but with an internal shuttle service being provided to facilitate the transport of patrons between 'hubs' could be a way to ensure development and expansion is possible, without resulting in potentially harmful impacts upon the AONB or special landscape character areas.</p> <p>Through expanding upon the wording of Policy E6, and acknowledging the multiple constraints typically associated with existing tourist accommodation sites, the Policy could be made more effective and more positively prepared.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To discuss how Policy E6 could be modified to allow for the expansion of tourist destinations and the economic benefits this would bring to the local area.
Attachment(s)	
Consultation Point Title	New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites
Consultation Point Number	Policy E 6
Section of the Plan	Policy E 6 New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites
ID	LPS473
Response Date	07/03/2022 17:59:52
Name	Mr Andrew Hird
Organisation	Woodlands Caravan Site (Trimingham) Ltd
Agent Name	Mr Alastair Curran

Agent Organisation	Planning Places
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>Policy E6 is considered to be sound, in that it facilitates the expansion of existing tourism sites resulting in a justified, effective, positively prepared policy that is consistent with national policy.</p> <p>The Covid 19 pandemic and the continuous rise in living costs (including heating), has resulted in tourism businesses requiring greater revenue to survive. The most effective way for businesses within the tourism industry, particularly caravan and lodge sites, to generate greater revenue is to expand through additional accommodation. By supporting developments for sustainable expansion, policy E6 meets the objectively assessed needs of the local area showing that the policy is both positively prepared and somewhat effective.</p> <p>The policy is considered to be consistent with national policy as it enables to a degree sustainable rural tourism and leisure developments which respect the character of the countryside as per paragraph 84 of the National Planning Policy Framework (NPPF), 2021.</p> <p>The policy is considered to be legally compliant and follows the council's duty to cooperate. The policy is part of a local plan which has followed the councils adopted Local Development Scheme (LDS) and has emerged as part of a process of community involvement. The council has also provided a sustainability appraisal report alongside this plan which is considered sound.</p> <p>On this basis Policy E6 is considered to be sound.</p>
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To provide verbal evidence supporting the need for sustainable tourism to be promoted through Policy E6.
Attachment(s)	
Consultation Point Title	New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites
Consultation Point Number	Policy E 6
Section of the Plan	Policy E 6 New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites
ID	LPS686
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes	Yes

* No	
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Sound – subject to project level HRA where required and the recommendations outlined below. We support the recommendation of the HRA which states that wording or supporting text could be strengthened and cross-referenced to ENV5 or GIRAMS. Natural England supports the consideration of environmental net gain within these policies as well as the need to demonstrate no adverse effects on the special qualities of the protected landscape, coastal landscape and AONB.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

8.7 Touring Caravan & Camping Sites

Consultation Point Title	Touring Caravan & Camping Sites
Consultation Point Number	8.7
Section of the Plan	8.7.2
ID	LPS231
Response Date	24/02/2022 11:36:00
Name	Ms Sarah Mitchell
Organisation	RSPB
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	States 'The use of land for touring caravan and camp sites has a lower impact than new-build accommodation as they are not permanently occupied and in winter months there may be little evidence of activity'. We suggest this presumption is incorrect. The impact of a growing tourism industry has considerable potential for increased recreational disturbance throughout the year and should be given greater scrutiny. This issue has been highlighted during the pandemic; a period where we have seen an increase in the number of s.73 planning applications made by holiday parks and accommodation providers who wish to extend site seasonal occupancy and holiday site footprint as well as s106 applications for 'pop-up' campsites. We have found the rise in holiday accommodation planning applications along the Norfolk coast alarming and have also raised the issue with King's Lynn and North West Norfolk Borough Council.
Modifications requested	Suggest the statement is taken out of the Plan unless it can be evidenced. Acknowledgement of the growing disturbance and pressures on infrastructure and the environment as a result of a growing holiday park sector which is often now open for the majority of the year should be made.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

Policy E 7 Touring Caravan & Camping Sites

Consultation Point Title	Touring Caravan & Camping Sites
Consultation Point Number	Policy E 7
Section of the Plan	Policy E 7 Touring Caravan & Camping Sites
ID	LPS109
Response Date	18/02/2022 15:43:22
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	point 1c- are there certain landscape characters or conservation areas (in addition to AONB etc) where new sites would not be permitted?
Modifications requested	There should be an additional point 1e that these should not be sited in specific landscape characters and conservation areas.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Touring Caravan & Camping Sites
Consultation Point Number	Policy E 7
Section of the Plan	Policy E 7 Touring Caravan & Camping Sites
ID	LPS209
Response Date	23/02/2022 23:25:29
Name	Mrs Gemma Harrison
Organisation	Cley Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound	

<ul style="list-style-type: none"> * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy 	
Explanation	CLRs fully support this policy but ask that consideration is given to not allow wild camping in some of the most sensitive areas of the AONB North Norfolk coastline.
Modifications requested	
Appear at examination hearing session(s)? <ul style="list-style-type: none"> * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s) 	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Touring Caravan & Camping Sites
Consultation Point Number	Policy E 7
Section of the Plan	Policy E 7 Touring Caravan & Camping Sites
ID	LPS346
Response Date	04/03/2022 14:42:21
Name	Miss Natalie Beal
Organisation	Broads Authority
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? <ul style="list-style-type: none"> * Yes * No 	
Has the duty to cooperate been met? <ul style="list-style-type: none"> * Yes * No 	
Do you consider the plan to be Sound? <ul style="list-style-type: none"> * Yes * No 	
Reason(s) not Sound <ul style="list-style-type: none"> * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy 	
Explanation	Comment This section does not mention the Broads. The type of development could impact the setting of the Broads. This issue can be addressed by referring to the setting of the Broads at policy E7 3. Relevant part of NPPF The Broads and the setting of the Broads is protected at NPPF paragraph 176.
Modifications requested	Proposed change In all cases proposals must demonstrate measurable biodiversity net-gains; and that the proposal would not have a significantly detrimental impact upon: The key characteristics and valued features of the defined Landscape Type; the Broads , residential amenity; and the safety and operation of the local highway network.
Appear at examination hearing session(s)? <ul style="list-style-type: none"> * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s) 	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Touring Caravan & Camping Sites
Consultation Point Number	Policy E 7

Section of the Plan	Policy E 7 Touring Caravan & Camping Sites
ID	LPS605
Response Date	02/03/2022 12:17:00
Name	Ms Kerry Harris
Organisation	Thornage Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>Policy SS2 (Development in the Countryside) is applied to the designated Countryside Policy Area, as defined on the Policies Map. While the policy approach is welcome, including the reference to rural conservation areas (para. 4.2.1) it is noted that the list of permissible development includes criterion (f) "recreation and tourism".</p> <p>However, landscape sensitivity needs to remain a primary consideration. Currently, a mixed message is given when policy E7 (Touring Caravans & Camping Sites) is also taken into consideration; for while it is worded in a promotional way it directs the applicant away from those which are visually sensitive. However, conspicuous by its absence, is any express reference to the Glaven Valley Conservation Area ("GVCA"), which is the only rural conservation area within the district. Further, while awaiting its consultation draft conservation area appraisal and draft management plan later in 2022 (so outwith this Local Plan consultation), nonetheless, the North Norfolk Landscape Character Assessment SPD (2021) places emphases on the undeveloped rural character and appearance of the GVCA as well as addressing its particular landscape merits which echo those of the AONB, Heritage Coast and Undeveloped Coast</p> <p>Therefore, it is anomalous that the GVCA does not receive express reference as another exception.</p>
Modifications requested	<p>While it may be said that policy ENV7 will still need to be applied in respect of a site specific proposal within the GVCA, nonetheless, in the interests of soundness additional words need to be added to ensure that the intended objective of this policy is more effectively achieved.</p> <p>In the interests of consistency of approach the Parish Council proposes "or a rural Conservation Area" be added to Policy E7(1)(c). This choice of words provides the right emphasis and more easily contrasts the GVCA boundaries (and lack of suitability for E7 uses) with those of the individual settlement conservation areas (where different considerations might apply).</p> <p>The amended policy would then read:</p> <p>Policy E 7 Touring Caravan & Camping Sites 1. The use of land(1) for touring caravan and camping sites(2) will be supported where: a. the site is within the boundary of a Selected Settlement; or, b. the proposal is for the expansion of a site already in use for touring and camping; or c. the site lies outside of the boundary of a Selected Settlement but does not lie within the AONB, Heritage Coast, or Undeveloped Coast or a rural Conservation Area; and, d. complies with Policy CC 7 'Flood Risk & Surface Water Drainage' and national policy including where appropriate the sequential and exceptions tests.</p>

Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Touring Caravan & Camping Sites
Consultation Point Number	Policy E 7
Section of the Plan	Policy E 7 Touring Caravan & Camping Sites
ID	LPS687
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>Sound – subject to project level HRA where required and the recommendations outlined below.</p> <p>We support the recommendation of the HRA which states that wording or supporting text could be strengthened and cross-referenced to ENV5 or GIRAMS.</p> <p>Natural England supports the consideration of environmental net gain within these policies as well as the need to demonstrate no adverse effects on the special qualities of the protected landscape, coastal landscape and AONB.</p>
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Policy E 8 New Tourist Attractions & Extensions

Consultation Point Title	New Tourist Attractions & Extensions
Consultation Point Number	Policy E 8
Section of the Plan	Policy E 8 New Tourist Attractions & Extensions
ID	LPS110
Response Date	18/02/2022 15:46:35
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Point 2 - conservation areas are omitted
Modifications requested	Point 2 - add in no detrimental impact on conservation areas
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	New Tourist Attractions & Extensions
Consultation Point Number	Policy E 8
Section of the Plan	Policy E 8 New Tourist Attractions & Extensions
ID	LPS347
Response Date	04/03/2022 14:43:14
Name	Miss Natalie Beal
Organisation	Broads Authority
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective	

* It is not justified * It is not consistent with national policy	
Explanation	Comment This section does not mention the Broads. The type of development could impact the setting of the Broads. This issue can be addressed by referring to the setting of the Broads at policy E8 2. Relevant part of NPPF The Broads and the setting of the Broads is protected at NPPF paragraph 176.
Modifications requested	Proposed change In all cases proposals must demonstrate measurable biodiversity net-gains; and that the proposal would not have a significantly detrimental impact upon: The key characteristics and valued features of the defined Landscape Type; the Broads residential amenity; and the safety and operation of the local highway network.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	New Tourist Attractions & Extensions
Consultation Point Number	Policy E 8
Section of the Plan	Policy E 8 New Tourist Attractions & Extensions
ID	LPS379
Response Date	07/03/2022 11:18:39
Name	
Organisation	Holkham Estate
Agent Name	Mr Garth Hanlon
Agent Organisation	Savills (UK) Limited
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified; It is not consistent with national policy
Explanation	Introduction Savills (UK) Ltd is instructed by The Holkham Estate to make the necessary and relevant representations to the Regulation 19 version of the Local Plan for North Norfolk. As a major landowner within the District, it is important to engage with the Development Plan process and as such, the representations are submitted to ensure that the Plan is positively prepared, justified, effective and consistent with national policy within the NPPF. Representations This representation is an objection to Policy E8 which should be amended to address the shortcomings set out below in relation to the numbered sections of the proposed policy. It is our view that the policy as drafted is not justified and nor is it consistent with national policy. 1.a This section is unduly restrictive and amounts to a blanket prohibition of tourist development in the AONB, Heritage Coast or Undeveloped Coast areas. The policy should at the very least allow for the consideration of the specific merits of any proposed new

	<p>development in the three designated areas and set out the weight to be accorded to different material considerations. It may well be the case that a significant harm arising from new development is outweighed by the benefit of removing an existing impact or introducing other new merits.</p> <p>1 This policy should also be reworded to recognise that any harmful impact must be shown to be mitigated or outweighed by social, environmental or economic benefits</p> <p>Recommend rewording –</p> <p>1 The Council will support proposals for new build tourist attractions and extensions to existing attractions across the District. Proposals will be permitted where:</p> <p>2 it has been demonstrated that there are no suitable buildings for re-use in the locality</p> <p>3 the application is supported by details sufficient to satisfy the Local Planning Authority that the merits of the proposal in terms of social, environmental and economic impacts outweigh any identified harm, and particularly any harm to the designated AONB, Heritage Coast, or Undeveloped Coast;</p> <p>4 In all cases, proposals must demonstrate measurable biodiversity net-gains and fully address landscape, residential amenity and highway network considerations</p>
Modifications requested	<p>1.a This section is unduly restrictive and amounts to a blanket prohibition of tourist development in the AONB, Heritage Coast or Undeveloped Coast areas. The policy should at the very least allow for the consideration of the specific merits of any proposed new development in the three designated areas and set out the weight to be accorded to different material considerations. It may well be the case that a significant harm arising from new development is outweighed by the benefit of removing an existing impact or introducing other new merits.</p> <p>1 This policy should also be reworded to recognise that any harmful impact must be shown to be mitigated or outweighed by social, environmental or economic benefits</p> <p>Recommend rewording –</p> <p>1 The Council will support proposals for new build tourist attractions and extensions to existing attractions across the District. Proposals will be permitted where:</p> <p>2 it has been demonstrated that there are no suitable buildings for re-use in the locality</p> <p>3 the application is supported by details sufficient to satisfy the Local Planning Authority that the merits of the proposal in terms of social, environmental and economic impacts outweigh any identified harm, and particularly any harm to the designated AONB, Heritage Coast, or Undeveloped Coast;</p> <p>4 In all cases, proposals must demonstrate measurable biodiversity net-gains and fully address landscape, residential amenity and highway network considerations</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	New Tourist Attractions & Extensions
Consultation Point Number	Policy E 8
Section of the Plan	Policy E 8 New Tourist Attractions & Extensions
ID	LPS530
Response Date	07/03/2022 17:00:00
Name	Mr Andrew Hird
Organisation	Woodlands Caravan Site (Trimingham) Ltd
Agent Name	Mr Alastair

	Curran
Agent Organisation	Planning Places Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not consistent with national policy
Explanation	<p>Policy E8 is considered to be ineffective and inconsistent with national policy. The policy states that proposals in relation to tourist attractions within the AONB and Undeveloped Coastal Areas will not be supported either as new sites or extensions to existing attractions. This conflicts with both policy E6 of the draft allocation plan and paragraphs 84 and 176 of the NPPF.</p> <p>Paragraph 84 enables sustainable rural tourism and leisure developments which respect the character of the countryside.</p> <p>Paragraph 176 of the NPPF allows for development within the AONB where development can be designed to avoid or minimise any adverse impacts. However, policy E8 does not allow for any development within the AONB, Heritage Coast or Undeveloped Coast even if the proposals respect the character of the countryside. Therefore, policy E8 is inconsistent with national policy.</p> <p>Policy E8 is also contrary to policy E6 of the same local plan, which like paragraphs 84 and 176 of the NPPF supports extensions to existing tourist sites which would not have an adverse impact on the defined special qualities of an AONB, even if the existing site is within it.</p> <p>It is considered that policy E8 should be revised in light of the above to facilitate appropriate development in the AONB and sensitive landscape areas, especially where it can be proven there would be no, or limited impacts as per paragraphs 176 and 177 of the NPPF.</p>
Modifications requested	It is considered that policy E8 should be revised considering its conflict with the NPPF and policy E6 of this plan. Instead, it should be reworded to facilitate appropriate development in the AONB and sensitive landscape areas, especially where it can be proven there would be no, or limited impacts as per paragraphs 176 and 177 of the NPPF but wider benefits to the public or existing businesses.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	<p>We are able to utilise the distinct knowledge of a local operator and the collective 'Visit North Norfolk' to assist the Inspector with obtaining tourism related data, as well as being able to provide further clarity upon the sector and the ramifications of Covid 19.</p> <p>It would also be beneficial to verbalise our rational in regard to making Policy E8 sound, through helping alter the wording of the policy to have greater impact for existing operators and the public.</p>
Attachment(s)	
Consultation Point Title	New Tourist Attractions & Extensions
Consultation Point Number	Policy E 8
Section of the Plan	Policy E 8 New Tourist Attractions & Extensions
ID	LPS688
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England

Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>Sound – subject to project level HRA where required and the recommendations outlined below.</p> <p>We support the recommendation of the HRA which states that wording or supporting text could be strengthened and cross-referenced to ENV5 or GIRAMS.</p> <p>Natural England supports the consideration of environmental net gain within these policies as well as the need to demonstrate no adverse effects on the special qualities of the protected landscape, coastal landscape and AONB.</p>
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Policy E 9 Retaining an Adequate Supply & Mix of Tourist Accommodation

Consultation Point Title	Retaining an Adequate Supply & Mix of Tourist Accommodation
Consultation Point Number	Policy E 9
Section of the Plan	Policy E 9 Retaining an Adequate Supply & Mix of Tourist Accommodation
ID	LPS111
Response Date	18/02/2022 15:59:15
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	Point 2 - where will replacement tourist accommodation be allowed? Elsewhere in the vicinity isn't very specific. Should replacement tourist accommodation be in less sensitive landscapes? What sort of development proposals would be supported- to principal residency for example? Again, as said elsewhere, is North Norfolk too dependent on tourist accommodation? reuse should be to principal residences or affordable housing'
Modifications requested	Point 2 should be more specific about where replacement accommodation should be allowed. There should be more flexibility about the of use away from tourist accommodation.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Retaining an Adequate Supply & Mix of Tourist Accommodation
Consultation Point Number	Policy E 9
Section of the Plan	Policy E 9 Retaining an Adequate Supply & Mix of Tourist Accommodation
ID	LPS134
Response Date	21/02/2022 15:34:41
Name	Mrs Gemma Harrison
Organisation	Holt Town Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	No

Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	Holt Town Council are keen to see an increase in permanent residential development and therefore OBJECT to this policy. Town Cllrs don't see the need in securing future holiday lets, there is already a huge pressure on housing stock in North Norfolk with the attractive holiday lets being 2/3-bedroom houses which is also the starter homes needed for first time buyers. The high level of holiday let accommodation is driving up prices of residential accommodation for so many residents, making it impossible for them to afford to stay in the places they have grown up in. Town Cllrs feel that North Norfolk is a long way from losing its tourist accommodation and instead more needs to be done to protect and retain existing permanent residents. Therefore, Holt Town Council question how sound this policy is and asks the Inspector to look at the evidence base and in particular compare it to other evidence, such as housing availability, house prices etc.
Modifications requested	Policy not needed or amended to just deal with Hotels.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Retaining an Adequate Supply & Mix of Tourist Accommodation
Consultation Point Number	Policy E 9
Section of the Plan	Policy E 9 Retaining an Adequate Supply & Mix of Tourist Accommodation
ID	LPS210
Response Date	23/02/2022 23:32:12
Name	Mrs Gemma Harrison
Organisation	Cley Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	Cley Parish Council object to keeping an adequate supply of holiday accommodation, by ensuring a holiday let is replaced elsewhere if it goes back into another use. The demand for housing stock for local families is such that residential housing for local families should be a priority. This policy should be amended to maybe just focus on larger hotels. Many areas of North Norfolk suffer from a high percentage of

	holiday lets and therefore this policy doesn't reflect the need for an increase in local housing stock, therefore is unsound and not effective.
Modifications requested	Amend to focus just on larger hotels and not smaller holiday lets.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

9 Places & Sites

Consultation Point Title	Places & Sites
Consultation Point Number	9
Section of the Plan	9 Places & Sites
ID	LPS621
Response Date	07/03/2022 15:06:00
Name	Alicia Hull & Peter Crouch
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Given the change in life styles brought on by covid19 and the climate emergency, there should be more flexibility in allowing workshops and small businesses to be located in small settlements.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

9.1 Introduction

Consultation Point Title	Introduction
Consultation Point Number	9.1
Section of the Plan	9.1.4
ID	LPS129
Response Date	24/02/2022 16:25:00
Name	Mr. John Edwards
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	The Local Plan definition of settlement boundaries is not sound.
Modifications requested	Para. 9.1.4: the basis of the definition of settlement boundaries needs to be clarified as it does not refer to topography or urban form. It appears to be simply a result of the number of dwellings planned and, consequently, arbitrary.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

9.2 Site Allocations

Consultation Point Title	Site Allocations
Consultation Point Number	9.2
Section of the Plan	9.2.2
ID	LPS435
Response Date	07/03/2022 18:08:43
Name	
Organisation	Richborough Estates
Agent Name	Mrs Raj Bains
Agent Organisation	Boyer Planning
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	<p>Please refer to full statement of representations (see LPS263) on behalf of our client.</p> <p>Paragraph 9.2.2 of the submission version of the Local Plan states that: 'the sites that have been allocated are the most suitable sites when considered against the alternatives appraised through the site assessment process and Sustainability Appraisal.' It further adds that: 'the proposed sites are available for development and have a realistic prospect of delivering the required growth within the timeframe of the Local Plan.'</p> <p>We disagree with this paragraph as we consider that land at Paston Gateway would be a suitable site for development. The Housing and Economic Land Availability Assessment (HELAA) 2017, appraised Land at Paston Gateway, which is referenced as H0160 in the Part 1 Assessment of Housing Land (Appendix 2). The Council's assessment describes the site as: 'greenfield and is reasonably well related to North Walsham, has access to facilities and utilities'. Therefore, we disagree that the site is remote as described in the SA as this contradicts the site assessment set out the HELAA.</p> <p>It is not considered that alternative sites have been appropriately considered through the SA process for inclusion and allocation in the proposed plan.</p> <p>As set out in Section 7 of the attached representations, the proposed SUE (Policy NW62/A) presents some significant challenges before this site can be developed. As a result, we strongly consider the development of the site will not begin until 2030 at the earliest. This will leave 6 years of the plan period, which is essentially the latter part of the proposed plan to deliver a significant amount of development, which is unrealistic and unlikely to be deliverable.</p> <p>As we have set out in our comments, the emerging plan proposes 2,150 new dwellings in North Walsham, which are expected to come forward from two site allocations in North Walsham; Policy NW62/A and Policy NW01/B. Noting that 1,037 dwellings are projected to be completed post-plan period, the proposed housing provision in North Walsham equates to 1,113 dwellings to be completed between 2024-2036.</p> <p>Based on the Council's proposed housing trajectory of the proposed SUE and realistic commencement of this site coming forward from 2030/31, a total of 550 dwellings would be completed during the final 6 years of the plan period, leaving a total of 1,250 dwellings to be completed post plan period, 213 dwellings more than the Council project.</p>

	We find the Council have overestimated the housing delivery of the proposed plan and without any robust information to support the housing projections; the proposed site allocations policy (Policy DS 1 – Development Site Allocations) is not justified and therefore unsound.
Modifications requested	In response to Chapter 9.2 and Policy DS 1, we strongly suggest the Council consider allocating alternative smaller and medium sites that are able to provide and maintain an adequate supply of housing in North Walsham in the short (0 – 5 year) to medium term period (5 – 10 year). Should the Council fail to consider alternative or reserves sites for inclusion to the Local Plan, an early commitment to review the policies of the Plan after the first 5 years should be sought in accordance with paragraph 33 of the NPPF (2021), given that there is a high risk of under delivery in housing particularly from the proposed North Walsham SUE proposed in Policy NW62/A
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	Our representations provide fundamental concerns about the proposed policies contained in the Local Plan. It is critical the Inspector hears our views on why we think the Plan is unsound and will fail to meet local housing needs of North Norfolk. Ultimately, our views could help assist the Council in ensuring there is an adequate supply of new housing across the District and throughout the short term, medium and long term period of the Local Plan.
Attachment(s)	
Consultation Point Title	Site Allocations
Consultation Point Number	9.2
Section of the Plan	9.2 Site Allocations
ID	LPS263
Response Date	07/03/2022 17:50:00
Name	
Organisation	Richborough Estates
Agent Name	Mrs Raj Bains
Agent Organisation	Boyer Planning
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	SEE ATTACHED FILE Please refer to full statement of representations (attached) on behalf of our client. The proposed Local Plan Policy NW62/A sets out a mixed-use Sustainable Urban Extension (SUE) amounting to 108 hectares for the allocation of approximately 1,800 dwellings, 7 hectares of employment land, green infrastructure, community facilities and a new road linking Norwich Road, Cromer Road and the industrial estate. The proposed site-specific requirements of the policy include the prior approval and adoption of a comprehensive Development Brief. This is required to incorporate a site wide Vision and Masterplan and a Design Code. The Development Brief is to set out plans for the early

	<p>delivery of a link road connecting Norwich Road to Cromer Road and a suitable route over the railway for access to Lyngate/Folgate Road industrial estate.</p> <p>Policy HOU 1 of the emerging Local Plan proposes a minimum housing target of 9,600 dwellings over the plan period. Section 23 of the emerging plan proposes a housing trajectory, which we consider provides for an overestimated housing provision during the first 5 years of the plan. A large proportion of this provision is expected to be delivered from the proposed site allocations, particularly Policy NW62/A; however, we are concerned that the evidence does not support that this site will come forward at the projected time and that the Council should consider allocating additional small and medium sites to make the plan resilient to change and fundamentally to ensure the overall housing need is achieved.</p> <p>These representations support development and growth in North Walsham and the recognition within the Local Plan that North Walsham is a relatively unconstrained location for high levels of growth. However, for the reasons set out in our representations it is considered that the emerging Local Plan is not sound. Our client has fundamental concerns with the proposed plan including the deliverability of the proposed SUE, an overestimate of supply within the housing trajectory and the Council's approach towards maintaining an adequate supply of housing over the course of the plan period.</p> <p>It is considered that the emerging plan is not justified as it fails to provide a robust and credible evidence base to support the housing delivery of the proposed site allocations, which could fail to meet local housing needs in the short term period (first 5 years of the plan). The absence of flexibility within the plan to respond to any potential shortfalls in delivery is a key issue. Should the proposed North Walsham SUE fail to come forward during the plan period, or even towards the latter part of the plan period, there is a high risk that the plan would fail to provide the minimum housing requirement.</p>
Modifications requested	<p>SEE ATTACHED FILE</p> <p>We consider that the Council have failed to allocate sufficient sites in the short and medium term (0-10 years of the plan) to ensure deliverability of the housing requirement over the plan period. We consider that additional sites should be allocated, such as land at Paston Gateway, to ensure that housing deliverability would take place within the earlier part of the plan period before the SUE comes on stream, to ensure an adequate supply of housing is available across the District.</p> <p>It is considered that Land at Paston Gateway, which is located north of North Walsham, is a suitable and sustainable site that could deliver housing in the short term for up to 330-350 market and affordable dwellings and associated public open space. This site, which has previously been considered by NNDC presents an excellent opportunity to deliver a high quality sustainable development in North Walsham which is both viable and deliverable.</p>
<p>Appear at examination hearing session(s)?</p> <p>* No, I do not wish to participate in examination hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
Justification for appearing at hearing	<p>Our representations provide fundamental concerns about the proposed policies contained in the Local Plan. It is critical the Inspector hears our views on why we think the Plan is unsound and will fail to meet local housing needs of North Norfolk. Ultimately, our views could help assist the Council in ensuring there is an adequate supply of new housing across the District and throughout the short term, medium and long term period of the Local Plan.</p>
Attachment(s)	<p>220225 - North Norfolk Reg 19 Reps - Final.pdf Appendix 1 - Land at Paston Gateway Illustrative Layout.pdf Appendix 2 - North Walsham West Consultation & Engagement Report.pdf</p>
Consultation Point Title	Site Allocations
Consultation Point Number	9.2
Section of the Plan	9.2 Site Allocations
ID	LPS234
Response Date	24/02/2022 11:42:00
Name	Ms

	Sarah Mitchell
Organisation	RSPB
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared
Explanation	The Local Plan identifies all allocations within the Borough and the HRA assesses those screened for likely significant effects. Where allocations are set close to the coast (Cromer, Wells-next-the-Sea, Blakeney, Sheringham) particular attention needs to be paid to mitigation required for increased recreational disturbance to species and habitats of designated sites. We are pleased this is included in the Plan, for example, in paragraph 9.2.8 and that Wells and Blakeney are identified in the HRA (Stage 2, Appropriate Assessment: Recreation). However, key areas have been omitted.
Modifications requested	We would suggest also including Cromer and Sheringham due to their immediate proximity to The Greater Wash SPA.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Site Allocations
Consultation Point Number	9.2
Section of the Plan	9.2 Site Allocations
ID	LPS728
Response Date	28/02/2022 08:14:00
Name	Mrs Debbie Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	

Explanation	<p>We very much welcome the preparation of the Historic Environment Topic Paper and in particular the Heritage Impact Assessments for each of the sites. These provide a sound and robust basis for the allocations.</p> <p>However, it is important that the recommended wording from these HIAs(section 3) is carried through into the policies. Further advice on this is given in our covering letter.</p> <p>Historic England's Advice Note on Site Allocations HEAN3 includes advice on site allocation policies at paragraphs 3.1 – 3.2. It states, 'The level of detail required in a site allocation policy will depend on aspects such as the nature of the development proposed and the size and complexity of the site. However, it ought to be detailed enough to provide information on what is expected, where it will happen on the site and when development will come forward including phasing. Mitigation and enhancement measures identified as part of the site selection process and evidence gathering are best set out within the policy to ensure that these are implemented.'</p>
Modifications requested	<p>Amend policies to include recommended wording from HIAs.</p> <p>Revisit supporting text and policy wording to ensure sufficient detail and consistent approach with respect to the historic environment.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Site Allocations
Consultation Point Number	9.2
Section of the Plan	Paragraphs 9.2.0 - 9.2.9
ID	LPS359
Response Date	04/03/2022 17:37:17
Name	
Organisation	Church Commissioners for England
Agent Name	Mr Ollie Eyre
Agent Organisation	Deloitte
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	<p>The Church Commissioners for England have previously submitted representations as part of the Call for Sites exercise in 2016 and identified a site ('Land south of Norwich Road') as having the potential to provide up to 87 dwellings.</p> <p>These previous representations put forward 'Land south of Norwich Road' in Ludham as suitable for allocation for residential development assisting in the required growth of North Norfolk over the Plan Period.</p> <p>However, the North Norfolk HELAA 2017 identified, 'Land south of Norwich Road' as unsuitable for development.</p> <p>In addition, the Church Commissioners for England also submitted representations to the Regulation 18 Consultation and Call for Sites (Small Growth Villages) exercises in May 2019. As well as re-confirming proposals for 'Land South of Norwich Road' this</p>

	<p>representation also included 8 smaller Commissioners' sites within Horning for consideration.</p> <p>In the published Regulation 19 Local Plan document, none of the Commissioners' sites are allocated for residential development. The Commissioners site "Land East of Abbot Road", which is subject to a live application, has also not been reallocated in the Regulation 19 draft.</p> <p>For the reasons identified in the Commissioners' response in paragraphs 20.0.1. - 20.2.3. and Policy SS1 we do not consider the plan to be sound.</p>
Modifications requested	<p>It is the Commissioners' view that their sites represent an excellent opportunity for the North Norfolk Local Plan to demonstrate how it will meet identified local housing need within North Norfolk between now and 2036. The sites are wholly within the Commissioners' ownership, and are suitable, available, and achievable when considered against the criteria found in the PPG to be used when assessing sites for allocations within Local Plans. The Commissioners would invite the Council to reconsider the allocations.</p> <p>Further information relating to the modifications the Commissioners' consider necessary to make the Plan sound can be found in the Commissioners' responses to paragraphs 20.0.1. - 20.2.3 and Policy SS1.</p> <p>Please also see the attached for further information.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	The Church Commissioners for England have been engaged throughout the plan making process and still have outstanding concerns regarding the soundness of the plan.
Attachment(s)	North Norfolk Reg 19 Draft Reprs LEP and EQAR Reviewed.pdf

Policy DS 1 Development Site Allocations

Consultation Point Title	Development Site Allocations
Consultation Point Number	Policy DS 1
Section of the Plan	Policy DS 1 Development Site Allocations
ID	LPS112
Response Date	18/02/2022 16:03:10
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	There is concern in Coastal Ward about the potential use of new dwellings as holiday or second homes (this would apply to Wells and Blakeney), and with infrastructure capacity in Holt.
Modifications requested	Designation of new homes for principal residency in coastal towns and villages. Provision of infrastructure (especially parking and health care) prior to development in Holt.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Development Site Allocations
Consultation Point Number	Policy DS 1
Section of the Plan	Policy DS1 Development Site Allocations
ID	LPS306
Response Date	03/03/2022 09:02:42
Name	
Organisation	White Lodge (Norwich) Ltd
Agent Name	Mr Sam Hazell
Agent Organisation	Lawson Planning Partnership Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No

<p>Reason(s) not Sound</p> <ul style="list-style-type: none"> * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy 	<p>It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy</p>
<p>Explanation</p>	<p>SEE ATTACHED FILE</p> <p>The Plan is unsound when considered against the related tests set out in paragraph 35 of the NPPF (2021) as explained below.</p> <ul style="list-style-type: none"> • Not Positively prepared– the proposed Small Growth Village Strategy approach will not provide enough homes of the right type in the right places for a growing population to meet the area’s needs (including affordable) and could frustrate the delivery of sustainable housing development. • Not Justified– the strategy is not appropriate, taking into account the reasonable alternative to allocate suitable and available sites in Small Growth Villages, and is not based on proportionate evidence. • Not Effective– the plan does not provide landowners/ developers with sufficient planning certainty and will not therefore, deliver the required development, including affordable housing, in Small Growth Villages over the plan period. • Not Consistent with National Policy– The proposed Small Growth Village Strategy approach will not deliver sufficient homes, nor support community vitality & services viability, it will not therefore enable the delivery of sustainable development in rural areas. This approach would run counter to para 78 which states, “In rural areas, planning policies and decisions should be responsive to local circumstances and support housing development that reflect local needs”, and para 79, “To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.” <p>We OBJECT to Policy DS1 because it does allocate any sites in any of the Small Growth Villages, and in particular High Kelling, as set out in our related objection to Policy SS1 Spatial Strategy, and as set out in detail in the representations letter dated 1st March 2022, attached.</p> <p>Please also see separate representations which request changes to the approach and detailed wording of Policy SS1, Policies Map, Policy HOU1, Policy HOU2, Policy HC4, and Policy E6, which provide further justification in support of our representations on the Plan which should be read as a whole.</p>
<p>Modifications requested</p>	<p>SEE ATTACHED FILE</p> <p>In order to enable housing development that reflects local circumstances and needs and to make the Plan sound, it should be modified to identify site allocations for housing developments of appropriate scale at Small Growth Villages, to contribute to meeting local need (including affordable) and support local rural vitality and services viability, in accordance with the NPPF and as set out in detail in the representations letter dated 1st March 2022, attached.</p> <p>High Kelling has a good range of services and is well related to the towns of Holt to the west, and Sheringham & Cromer to the northeast, via sustainable travel modes, and the principal road network.</p> <p>We request that the site at the Former Four Seasons Nursery, High Kelling, is allocated for residential development as set out in our letter of 18th June 2019 submitted in response to the Reg 18 consultation, attached. The site is located in a sustainable location, where it will support both existing services in the settlement of High Kelling and that of those nearby. This underused site forms part of the established village functionally and visually and has the potential to provide much needed housing, including making a meaningful contribution to the affordable housing need in the village. Our 2019 submission with attached feasibility layout demonstrates that this site can be laid out in a manner which respects the prevailing character of the area and the amenities of nearby adjacent properties. It is considered that this amendment would address the soundness objection.</p>
<p>Appear at examination hearing session(s)?</p> <ul style="list-style-type: none"> * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s) 	<p>Yes, I wish to participate in hearing session(s)</p>

Justification for appearing at hearing	In accordance with our legal right to appear before and be heard by the inspector at the hearing. We wish to elaborate on our representations, which set out the changes we have requested to the strategy approach and the identified interrelated policies that are required to make the plan sound.
Attachment(s)	176_HighKelling_Reg19.Reps.Letter.FINAL_1.3.22.pdf (5) FINAL LPPRepslett WhiteLodge NNLP 18.06.19.pdf (5)
Consultation Point Title	Development Site Allocations
Consultation Point Number	Policy DS 1
Section of the Plan	Policy DS1 Development Site Allocations
ID	LPS471
Response Date	07/03/2022 17:25:39
Name	
Organisation	Trinity College Cambridge
Agent Name	Mrs Kirstie Clifton
Agent Organisation	Define Planning and Design
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>SEE ATTACHED FILE</p> <p>Trinity College Cambridge continues to support the allocation of Site Reference F01/B Land North of Rudham Stile Lane for development and considers the site to be a suitable location for strategic growth within Fakenham, reflecting its status as a Large Growth Town within the settlement hierarchy.</p> <p>Indeed, as shown on the Landownership Plan that is included with these representations (Ref: DE_033_F01-B Rev A), the site adjoins land that has already secured outline planning permission (Site Ref: F01A and NNDC Application Ref: PO/17/0680) including for supporting infrastructure in the way of a primary means of access into the site, plus education and local centre facilities. The means of access and relationship between both sites is included on the above plan.</p> <p>Allocation site F01/B comprises a total site area of circa 26.5 hectares (ha). Trinity College Cambridge is promoting land comprising circa 17.7 hectares (ha) of that allocation as shown on the plan, with the remaining land comprising existing sports and recreation facilities and agricultural land being within separate land ownership.</p> <p>Given this, the principle of allocating the site is considered sound. However, in accordance with the four tests set out under NPPF paragraph 35, the capacity requirements of the policy should be slightly amended to ensure that it is justified and effective, and deliverable over the plan period.</p> <p>On the basis that some existing uses may be retained, in particular existing sports facilities, it is proposed that the residential development capacity should include a range from 350-560 dwellings, plus 100 units of elderly care accommodation, open space and supporting infrastructure. In this way, the policy will avoid unnecessarily restricting the delivery of development across the majority of the site within the control of Trinity College Cambridge.</p> <p>It is noted that the policy confirms planning permission will be granted for development subject to compliance with the site specific and general policies of the Plan.</p>

Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	As the agent promoting an area of Land North of Rudham Stile Lane, Fakenham, Define Planning and Design Ltd wish to reserve the right to participate in the hearing sessions in relation to Policies DS1 and F01/B.
Attachment(s)	NNLP Reg 19 Reps - Define Planning and Design on behalf of Trinity College Cambridge.pdf DE033_F01-B Boundary Plan REVA.pdf
Consultation Point Title	Development Site Allocations
Consultation Point Number	Policy DS 1
Section of the Plan	Policy DS 1 Development Site Allocations
ID	LPS799
Response Date	28/02/2022 14:38:00
Name	Mr Darl Sweetland
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>The Local Plan seeks to plan for 12,096 homes between 2016 and 2036. Excluding completions and sites with planning permission sites policy and sites for some 7,281 homes are required at an annual average rate of 485 a year. Across the four categories of settlement 35 settlements are identified to accommodate growth with 1890 homes being planned for through windfalls.</p> <p>SUPPORT: Anglian Water welcomes the engagement of infrastructure providers (9.2.9). Our standard approach to planning to support growth is to plan investment in water supply and wastewater through our five-year plans. Anglian Water produces two long term plans to set out and agree investment with regulators which is then funded by customers through their water bills. The Drainage and Wastewater Management Plan (DWMP) for 2025 to 2030 (www.anglianwater.co.uk/about-us/strategies-and-plans/drainage-and-wastewater-management-plan) is currently being prepared and will consider growth planned by Councils in their Local Plans. To assess the need for new infrastructure we use a forecast population. This is derived from a review of the adopted local plan cross referenced against accepted planning applications. Where Anglian Water are confident in the local plan (adopted/examination stage) we take the full growth forecast for the end of the planning period. This is then adjusted to consider the short-term population change based on our knowledge from planning applications. Beyond the planning period Anglian Water uses the housing/ population trend. Where the Local Plan is not adopted, we take known planning applications and follow a trend line for growth.</p> <p>To unpack this Anglian Water wanted as part of the previous regulatory process to plan for and secure agreement to invest to provide capacity to meet (& manage) demand at the levels of growth set out in all published plans. This was not agreed by Ofwat and so we have taken</p>

the above approach that sites will be factored in when the Local Plan is adopted. When major sites seek planning approval then these will be considered and given more weight/ certainty in Anglian Water's updated models. Sites with full planning will be given full weight in modelling and in evidenced submitted to Ofwat to agree funding for new or expanded treatment capacity in each five- year plan. Developers are required to pay for the new connections and network capacity for water supply and sewers to serve their sites (i.e., 10.0.8 re. Cromer and point 6. And 7. in Policy C07/2).

For specific sites developers are advised to contact Anglian Water developers and to complete a pre-application enquiry (www.anglianwater.co.uk/developing/planning-capacity/planning-and-capacity) to develop a feasible solution for water supply and drainage requirements.

Wastewater Recycling Centre (WRC) capacity

Taken together the unconstrained WRC capacity in North Norfolk could accommodate the planned level of growth if the spatial allocation of sites simply followed the available capacity. Significant headroom is available at two of the three principles locations for growth at Cromer and North Walsham. Recognising that the plan is now at pre submission stage we understand that it is now difficult to change the spatial distribution of growth to use headroom elsewhere which would both reduce the carbon impact of growth from works to expand WRC capacity. Undertaking either less or no expansion work to cater for growth would also lower customer bills.

For example, additional growth – or bringing forward growth earlier in the plan period at Cromer and North Walsham – could remove, reduce, or delay the need for investment in WRC's Holt, Mundesley, Badersfield and other WRCs. This would reduce the carbon costs of building additional capacity at those growth locations by utilising capacity at existing WRC in accordance with the Sustainability Hierarchy and the plan's overarching vision of climate resilient sustainable development. Growth in locations served by existing WRCs with headroom could also enable consideration of reductions of growth levels in settlements which suffer from flooding and other environmental constraints. Based on the emerging Plan it is likely that investment by customers will be required at Fakenham (11.1.5), Mundesley and Holt within the Plan period to enable the planned growth at seven settlements to have adequate wastewater treatment capacity at their most proximate WRC. Treatment at WRC which are not the closest site is technically feasible although not a sustainable option given the energy and carbon costs (construction and operation).

Looking at growth levels Anglian Water would consider plans for the Fakenham WRC capacity in AMP9 (2030-35). Based on allocations in the Plan, without investment capacity at Fakenham WRC could be used up in or before 2032. Capacity at Mundesley and Holt is the subject of review as part of the new DWMP. If required investment at Mundesley and Holt could increase capacity in AMP8 (2025-30). Anglian Water's AMP8 plans could be brought forward early in AMP8 to support confirmed growth allocations when the Local Plan is adopted.

NOTE: Anglian Water notes the allocations in Policy DS1 and will plan investment to meet the levels of growth at those sites when the Local Plan is adopted.

Nutrient Neutrality

Anglian Water is aware that Natural England (NE) are in the early stages of assessing the implications of growth in Norfolk on water quality at European level designated nature conservation sites. The water courses which NE may seek to require developers to show that their development would not add to nutrient pollution include the Wensum, Bure, Ant and Thurne. Sixteen of the 35 settlements identified for growth would be served by WRC which discharge treated wastewater into these water courses. If none of the developments at these locations could demonstrate Nutrient Neutrality, circa 1450 homes would need to allocate to other settlements and sites. This assumes that sites with existing planning permission/ already in construction could continue to be built.

SUPPORT: In view of the current emerging position on nutrient neutrality Anglian Water recognises the need – in Policy F10, for example – for the Council to require:

Enhancement to sewerage infrastructure should be undertaken prior to the first occupation of any dwelling to prevent detriment to the environment and comply with the Water Framework Directive obligations.

	<p>SUPPORT: Anglian Water support the requirement for site-specific assessment and measures to address local habitat designations. For example, Policy HV01/B requires:</p> <p><i>Provision of a site-specific Water Catchment and Foul Water Drainage Strategy prior to the commencement of development and be aligned with a wider catchment strategy produced by Anglian Water and ensure there is no adverse impact on the integrity of the Broads SAC/SPA.</i></p>
Modifications requested	<p>Anglian Water is aware that Natural England (NE) are in the early stages of assessing the implications of growth in Norfolk on water quality at European level designated nature conservation sites. The water courses which NE may seek to require developers to show that their development would not add to nutrient pollution include the Wensum, Bure, Ant and Thurne. Sixteen of the 35 settlements identified for growth would be served by WRC which discharge treated wastewater into these water courses. If none of the developments at these locations could demonstrate Nutrient Neutrality, circa 1450 homes would need to allocate to other settlements and sites. This assumes that sites with existing planning permission/ already in construction could continue to be built.</p> <p>SUPPORT: In view of the current emerging position on nutrient neutrality Anglian Water recognises the need – in Policy F10, for example – for the Council to require:</p> <p><i>Enhancement to sewerage infrastructure should be undertaken prior to the first occupation of any dwelling to prevent detriment to the environment and comply with the Water Framework Directive obligations.</i></p>
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Development Site Allocations
Consultation Point Number	Policy DS 1
Section of the Plan	Policy DS 1 Development Site Allocations
ID	LPS803
Response Date	07/03/2022 18:09:00
Name	
Organisation	Turley Planning
Agent Name	Mr Steve Kosky
Agent Organisation	
Do you consider the plan to be Legally Compliant?	
* Yes	
* No	
Has the duty to cooperate been met?	
* Yes	
* No	
Do you consider the plan to be Sound?	No
* Yes	
* No	
Reason(s) not Sound	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	<p>SEE ATTACHED FILES</p> <p>1.1 These representations have been prepared by Turley on behalf of Pigeon Investment Management Ltd (hereafter referred to as Pigeon) on behalf of Pigeon Land Ltd and Jean Margaret Clifton, Jane Michelle Clifton and Iain David Clifton (the Landowners). These representations are made pursuant to the North Norfolk Local Plan, Regulation 19 Consultation, January 2022, in support of the promotion of Land at</p>

Runton Road / Clifton Park, Cromer (the Site), for a new high quality landscape and design-led sustainable scheme.

1.2 The promoted Site lies on the western edge of Cromer, approximately 1km from the town centre and forms a natural and sustainable extension to the town. The Site enjoys good walking links to the town centre and the railway station and is well served by regular bus services, with existing bus stops located immediately to the east of the Site.

1.3 The Site is 8 ha in area and can bring forward a high quality landscape and design-led sustainable scheme comprising 3 ha of land for the provision of approximately 55 new homes, including 19 new affordable homes, together with Extra Care accommodation, on land south of the A149 and west of Clifton Park. The remaining majority of the Site area will comprise 5 ha of new publicly accessible green space, allotments, ecological enhancements and new footpath connections. This equates to 60% of the Site being retained in the public realm.

1.4 The Site has no known constraints to early delivery and is of a scale that can be brought forward rapidly to meet urgent housing needs within the early years of the plan period, thereby assisting the Council in meeting its five year housing land supply requirement. A detailed analysis of the Runton Road / Clifton Park Site and the scheme advocated by Pigeon on behalf of the Landowners is provided within the accompanying Delivery Statement, submitted in conjunction with these representations, a copy of which, is attached at Appendix 2.

1.5 In terms of the spatial strategy, Pigeon fully supports the designation of Cromer as a Large Growth Town, recognising its function as an administrative centre, popular tourist destination and its strategic road and rail connections. However Pigeon objects to the omission of the above promoted Site from the Proposed Submission Version of the Plan, given its favourable location and sustainable characteristics. These have been recognised by the previous status of the Site as an emerging mixed-use allocation in the First Draft Local Plan (FDLP) for approximately 90 new homes and 2 hectares of land for a two-form entry primary school (under FDLP Policy C10/1), and subsequently by Planning Officers who recommended the allocation of the Site within the Regulation 19 Local Plan to the Council's Planning Policy & Built Heritage Working Party on two separate occasions [FOOTNOTE 1]

FOOTNOTE 1

Planning Policy & Built Heritage Working Party - Monday 13th July 2020

(<https://modgov.north-norfolk.gov.uk/eListDocuments.aspx?CId=141&Mid=608&Ver=4>); and Planning Policy & Built Heritage Working Party – Monday 13th September 2021

(<https://modgov.north-norfolk.gov.uk/eListDocuments.aspx?CId=141&Mid=680&Ver=4>)

1.6 Whilst the need for a new primary school in Cromer is no longer a material factor in the selection of the Site, the new homes and Extra Care components of the Site remain highly sustainable and would help to address this obvious shortfall.

1.7 Therefore Pigeon considers that the failure to include the above Site as a continued allocation is a significant shortcoming of the emerging Draft Local Plan and it therefore fails the test of soundness. To remedy the situation, the Site should therefore be taken forward as an allocation in the Draft Plan, in accordance with the written recommendation of Officers [FOOTNOTE 2].

FOOTNOTE 2

Planning Policy & Built Heritage Working Party - Monday 13th July 2020

(<https://modgov.north-norfolk.gov.uk/eListDocuments.aspx?CId=141&Mid=608&Ver=4>); and Planning Policy & Built Heritage Working Party – Monday 13th September 2021

(<https://modgov.north-norfolk.gov.uk/eListDocuments.aspx?CId=141&Mid=680&Ver=4>)

1.8 In terms of comparative analysis, it is important to note that Pigeon's promoted Site at Runton Road / Clifton Park, does not have any landscape designations and is not a valued landscape. In particular, the Pigeon Site does not lie within the Norfolk Coast Area of Outstanding Natural Beauty (AONB).

1.9 This contrasts with the other strategic allocations currently proposed by the Local Plan to be taken forward for strategic development at Cromer, which are both located in the AONB and currently contribute to its designation.

1.10 In this regard, the Former Golf Practice Ground at Overstrand Road (Policy C16) and Land West of Pine Tree Farm, Norwich Road (Policy C22/2) lie within the Norfolk Coast AONB.

1.11 Accordingly, the future development of these two sites will result in the permanent loss of land which currently contributes to this important national landscape designation. However sites C16 and C22/2 have both been taken forward, despite their visual impacts and permanent severance from the AONB when other, considerably less constrained sites, such as Pigeon's Site remain available in Cromer, as identified by Officers.

1.12 Of particular note is that site location C22/2 is in multiple land ownerships and to date there is no available evidence of any known collaboration agreement between the landowners.

1.13 Furthermore there are also tangible and unresolved highways issues which currently render this site both undeliverable and undevelopable in the context of Annex 2 of the NPPF.

1.14 Pigeon additionally have significant concerns in relation to the delivery of other sites in Fakenham and North Walsham as well as the minimum number of new homes to be provided.

1.15 These concerns are set out in Section 2 of these representations, supported by further evidence from Savills at Appendix 1.

1.16 In consideration of the above matters, Pigeon therefore do not accept that the Draft Local Plan, as submitted for this Regulation 19 consultation, meets the test of soundness, as set out in paragraph 35 of the NPPF, by reason of the following criteria:

Positively Prepared – The Plan is not positively prepared as it does not provide sufficient deliverable allocations for the number of new homes required.

Justified – The Draft Local Plan is not an appropriate strategy, taking into account the unresolved constraints on the current allocations in Cromer within the AONB and the lack of proportionate evidence to discount other reasonable alternative sites which remain available, such as Pigeon's promoted Site.

Effective – The Draft Local Plan is clearly not effective, as some of the strategic site allocation choices made in the AONB at Cromer are not deliverable, as set out within these representations.

Consistent with National Policy – The Draft Local Plan, as presented, does not enable the delivery of sustainable development in accordance with the policies in the Framework and other statements of national planning policy, as set out within these representations.

Land at Runton Road / Clifton Park, Cromer

4.1 The promoted Site lies on the western edge of Cromer and forms a natural and cohesive extension to the town. The Site is located approximately 1km from the town centre with good walking links to both the town centre and the railway station. The Site is well served by regular bus services to Cromer town centre as well as further afield, with existing bus stops positioned immediately east of the Site, adjacent to Clifton Park.

4.2 As set out above, in the interim period between the First Draft Local Plan Consultation allocation and the current Regulation 19 Consultation, the proposals have been modified and revised to reflect a new vision for the Scheme. The promoted Site has increased the extent of publicly accessible green space, with over 60% of the Site being retained for publicly accessible green space and offers a high quality landscape and design-led sustainable scheme for approximately 55 new dwellings, including new affordable homes, plus Extra Care accommodation, set over 3 ha, with the remaining 5 ha to the west reserved for landscaping, public open space and associated infrastructure works.

4.3 A detailed description of the proposals is provided in the supporting Delivery Statement at **Appendix 2**. In summary, the revised Scheme comprises the following attributes:

- The provision of approximately 55 new homes, of which up to 19 would be new affordable homes, with the inclusion of bungalows and a significant proportion of 2 and 3 bedroom homes.
- Land for Extra Care accommodation to help meet the Council's identified need for specialist accommodation in Cromer;
- The proposals represent a low density, landscape-led scheme, with over 60% of the Site retained as public open space, with new allotments also provided to meet an identified shortfall within Cromer;
- The Scheme will create a network of interconnected green spaces, with existing Public Rights of Way and new footpath and cycle connections;

- A green corridor will be provided along Bridleway BR22 and new green links delivered between Mill Lane, Runton Road and Fp16/Sandy Lane;
- A generous area of open space will be provided at the frontage of the Site with the A149 to provide an attractive Green Gateway entrance to the town.
- The combination of the Green Gateway and the undeveloped nature of the western area of the Site, will maintain the existing sense of clear visual separation between Cromer and East Runton;
- Surface water to be drained via a Sustainable Urban Drainable System (SuDS).

Conclusions & Recommendations

8.1 These representations have been prepared in support of a high quality landscape and design-led sustainable scheme for approximately 55 new homes, including 19 new affordable homes, together with Extra Care accommodation, on land south of the A149 and west of Clifton Park.

8.2 The NPPF recognises that small to medium sites, such as the promoted Site, which are unconstrained and do not require significant upfront infrastructure can be built out relatively quickly. This proposal would therefore make a positive contribution to the Council's continuous delivery of housing in the early years of the Plan period.

8.3 The location and orientation of the Site relative to surrounding built form means that development on the land would read as a logical extension to Cromer. The Site is also sustainably located close to employment sites and within a reasonable walking distance of local shops and services.

8.4 Importantly, the Site is not located in the Norfolk Coast AONB and is close to bus stops providing a frequent service into the Town Centre, where there is an extensive range of services and facilities. There are also opportunities to cycle and walk directly into Cromer Town Centre. The Pigeon proposals therefore represent an excellent opportunity for the early delivery of much needed market and affordable housing together with Extra Care accommodation, close to existing services and facilities in a highly viable and sustainable location. The Site thereby warrants reallocation in the Submission Version of the Local Plan, as originally recommended by Officers.

8.5 The assessment of the promoted Site, as set out in Section 3 of these representations and in the Delivery Statement at Appendix 1, clearly demonstrates that the proposed scheme performs a positive economic, social and environmental role and comprises sustainable development in accordance with the provisions of the NPPF.

8.6 In contrast, the Council's strategy for future growth and development in Cromer is unsound, as two unsustainable sites, both of which have a demonstrable impact upon the Norfolk Coast AONB (one of which is also not deliverable in the context of Annex 2 of the NPPF) have been allocated for mixed-use residential development when other suitable alternative sites located outside of the AONB at Cromer are available, such as the Site promoted by Pigeon.

8.7 Cumulatively, the combination of the site allocations at Overstrand Road and Pine Tree Farm will together result in the permanent loss of over 32 ha of land from the North Norfolk AONB, which will fail the test of soundness at the Local Plan Examination, unless the Council can unequivocally demonstrate there are no other suitable site alternatives and that the resultant loss of land from the AONB is in the public interest.

8.8 The Council's evidence base however does not provide any indication that this exercise has been undertaken, which means that the Draft Local Plan is fundamentally flawed.

8.9 The Regulation 19 Plan fails to clearly justify and set a housing requirement. We disagree with the approach taken by the Council and consider that the housing requirement set in Policy HOU1 should not be 9,600 homes as proposed but should be at least 10,620 homes.

8.10 Policy HOU1 sets out a total supply of 12,096 homes. However, this includes delivery beyond the 2016-2036 plan-period, which means only 10,599 dwellings are projected to come forward within the plan period. This figure falls short of the housing requirement of 10,620, before taking into account delivery concerns in respect of allocations in Fakenham, North Walsham and Cromer.

8.11 In consideration of the above matters, Pigeon therefore does not accept that the Draft Local Plan, as submitted for this Regulation 19 consultation, meets the test of soundness, as set out in paragraph 35 of the NPPF, by reason of the following criteria:

	<ul style="list-style-type: none"> • <u>Positively Prepared</u> – The Plan is not positively prepared as it does not provide sufficient allocations for the number of new homes required. • <u>Justified</u> – The Draft Local Plan is not an appropriate strategy, taking into account the unresolved constraints on the current allocations in Cromer within the AONB and the lack of proportionate evidence to discount other reasonable alternative sites which remain available, such as Pigeon’s promoted Site. In addition, there is no indication from the evidence base that the exceptional circumstances test has been appropriately carried out or met. • <u>Effective</u> – The Draft Local Plan is clearly not effective, as some of the strategic site allocation choices made in the AONB at Cromer are not deliverable. In addition, there remain significant concerns regarding the deliverability of allocations in Fakenham, North Walsham and Cromer. • <u>Consistent with National Policy</u> – The Draft Local Plan, as presented, does not enable the delivery of sustainable development in accordance with the policies in the Framework and other statements of national planning policy, as set out within these representations. <p>Recommendation: Land at Runton Road / Clifton Road, Cromer</p> <p>8.12 These representations and the revised Scheme set out in the accompanying Delivery Statement demonstrate that there are no significant reasons to outweigh the numerous identified social and economic benefits of the allocation of Land at Runton Road / Clifton Park. These include new market and affordable homes, new Extra Care accommodation and significant new community green infrastructure on the majority of the Site. This has been recognised and supported by Officers, but rejected by Members.</p> <p>8.13 The adverse impacts of the proposals are limited to a change in character of only around 40% the Site with a resultant minimal impact upon a wider landscape. The entirety of the Site lies outside of the AONB and it has no other statutory landscape designations nor is it identified as a valued landscape.</p> <p>8.14 The overall balance of material considerations and the relative merits of the proposals accordingly weigh in favour of the reinstatement of the Site as an allocation for mixed-use residential development and publicly accessible green space.</p>
Modifications requested	<p>SEE ATTACHED FILES</p> <p>8.15 Therefore these representations conclude that in order for the Draft Local Plan to be found sound that it is strongly recommended that the promoted Site is reinstated as an allocation.</p> <p>8.16 This reinstated allocation will help to address the shortfalls arising from the significant compound number of delivery issues identified by these representations at a number of other strategic sites in Cromer, Fakenham and North Walsham.</p> <p>8.17 The Site can assist with these shortfalls by delivering approximately 55 new homes, including approximately 19 new affordable homes, together with Extra Care accommodation, on land south of the A149 and west of Clifton Park, in accordance with recommendations of Officers of the Council.</p>
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	<p>Pigeon Investment Management - Responses to the North Norfolk Regulation 19 Consultation - January 2022 FINAL.pdf Appendix 1 - North Norfolk Assessment of Identified LHN.pdf Appendix 2 - Land at Clifton Park - Delivery Statement.pdf</p>
Consultation Point Title	Development Site Allocations
Consultation Point Number	Policy DS 1
Section of the Plan	Policy DS 1 Development Site Allocations
ID	LPS785
Response Date	08/03/2022 09:31:00
Name	Ms

	Eleanor Roberts
Organisation	Water Management Alliance
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>Thank you for consulting the Water Management Alliance on the North Norfolk Proposed Submission Version (Regulation 19 Publication) Local Plan. The Parishes included in the Housing Allocation Plan have some lands located within the boundary of the Internal Drainage District (IDD) of the Broads (2006) Internal Drainage Board (IDB) and Norfolk Rivers Internal Drainage Board (IDB). The Board's Byelaws therefore apply to those lands.</p> <p>A copy of the Board's Byelaws for The Broads IDB can be accessed on our website (https://www.wlma.org.uk/uploads/BIDB_Byelaws.pdf), along with maps of the IDD (https://www.wlma.org.uk/uploads/84-BIDB_drainindex.pdf). A copy of the Board's Byelaws for Norfolk Rivers IDB can be accessed on our website (https://www.wlma.org.uk/uploads/NRIDB_Byelaws.pdf), along with maps of the IDD (https://www.wlma.org.uk/uploads/179-NRIDB_Index.pdf).</p> <p>In keeping with other WMA member Boards, the principal function of the Broads (2006) IDB and Norfolk Rivers IDB is to provide flood protection within the Board's area. Certain watercourses within the IDD have been designated as 'Adopted Watercourses' by the Board. The adoption of a watercourse is an acknowledgement by the Board that the watercourse is of arterial importance to the IDD and as such, will normally receive maintenance from the IDD.</p> <p>For clarity, Main Rivers within each IDB are regulated by the Environment Agency.</p> <p>The Board's rationale and approach towards managing flood risk and water levels within the IDD is set out in the WMA Group's Planning and Byelaw Strategy document (https://www.wlma.org.uk/uploads/WMA_Planning_and_Byelaw_Policy.pdf). The Board will comment on planning for all major developments (10 or more properties) within the IDD watershed that are likely to discharge surface water into a watercourse within the IDD. Under certain circumstances, some major developments outside the IDD boundary may also be regulated by the Board's byelaws. We request that the Board is consulted as any planning application comes forward relating to any of the identified allocation sites.</p> <p>In order to reduce potential conflict between the planning process and the Board's regulatory regime and consenting process please be aware of the points set out below.</p> <p>Sites within WMA Board IDD</p> <ul style="list-style-type: none"> F10 Fakenham, Land South of Barons Close <p>This allocation site is partially within the Norfolk Rivers IDD, and I note the presence of a Board Adopted watercourse (DRN093G0101 – MN51 Fakenham) adjacent to the southern site boundary, as well as riparian watercourses to the east and west. For any future proposals at this site, please be aware of the following:</p> <ul style="list-style-type: none"> • Surface water disposal from new developments should be in line with the drainage hierarchy (as per best practice). • If surface water is proposed to be disposed of via infiltration, we would recommend that the proposed strategy is supported by ground investigation to determine the infiltration potential of the site and the depth to groundwater. If on-site material were to be considered

favourable then we would advise infiltration testing in line with BRE Digest 365 (or equivalent) to be undertaken to determine its efficiency.

- If a surface water discharge is proposed to a watercourse, the proposed development will require land drainage consent in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment of a Surface Water Development Contribution fee, calculated in line with the Board's charging

policy (https://www.wma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf).

- The discharge of treated foul water to a watercourse within the IDD requires land drainage consent in line with the Board's byelaws (specifically byelaw 3).

- Any works within 9 metres of a Board adopted watercourse will require consent to relax Byelaw 10 (no obstructions within 9 metres of the edge of drainage or flood risk management infrastructure).

- If development proposals involve works to alter a Board Adopted watercourse, consent is required under Section 23 of the Land Drainage Act 1991 (and byelaw 4).

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

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

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

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

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

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

- If it is proposed that a site disposes of surface water via infiltration, we recommend that the viability of this proposal is evidenced by ground investigation followed by infiltration testing in line with BRE Digest 365.

- If a surface water discharge is proposed to a watercourse within the watershed catchment of the Board's IDD then we request that this be in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible.

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

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

- BLA04/A, Blakeney, Land East of Langham Road
- BRI01, Briston, Land East of Astley Primary School

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

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

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

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

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

Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Consultation Point Title	Cromer
Consultation Point Number	10
Section of the Plan	10.0.3
ID	LPS521
Response Date	24/02/2022 12:00:00
Name	Mr William Horner
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	<p>A substantial part of the land in C22/2 falls within previous amended planning applications regarding P0/18/1551 which were rejected due to grave concerns from Highways who found that traffic leaving this site along the Roughton Road towards Mill Lane would cause unacceptable risks caused by sight line issues as it entered the B1436 Felbrigg road. They found these problems to be "Irresolvable!"</p> <p>Traffic leaving the proposed site of C22/2, even if it has no exit onto the Roughton Road will exit by the Norwich Road. Rather than brave the gridlock that so often blights Cromer, drivers, as before from P0/18/1551 will seek the same escape route. This is easily accomplished when leaving C22/2 by turning right along the Norwich road (A149) travelling a short distance and then turning right along Carr Road turning left at the junction of the Roughton Road and Mill road to exit onto the B1436. This, the very same place that Highways found the problems associated with it to be "irresolvable."</p> <p>Because the size of C22/2 is much greater than P0/18/1551 this must involve even more traffic braving these "irresolvable" sight lines. The increased risks of death and serious injury at this junction cannot be understated, should a suit be brought against the authority as a result of foreseeable and forewarned hazards as a rate payer I would not like to subsidise the costs of the defence and substantial damages that may be awarded.</p> <p>I have heard from sound sources that part of the reason for including this site in the submission is that it will improve bio diversity.</p> <p>A vigorous opposition to P0/18/1551 was presented by Roughton parish council whose permissible new building constructions were limited by various plans to a relative handful. An extremely well attended Parish Council meeting voted overwhelmingly by some 98% against such a development within their parish. Pertinent objections to such were sent by the Parish Clerk demanding substantial compensation of at least £1,000,000 should this development proceed. Part of C22/2 falls within the very same area as before.</p> <p>I believe the plan to develop C22/2 in its entirety to be unjustified and unsound because a large infill area of undeveloped wasteland near the centre of Cromer which lies within its own parish boundary the development of which would ameliorate these problems has not been included in the plan and the plan is therefore unsound.</p>
Modifications requested	There is a large undeveloped infill site to the west of Clifton Park which lies within the Cromer parish boundary. Development of this site would naturally and harmoniously extend the present building line, and,

because of its size a visual gap between the next settlement of East Runton could readily be achieved.

This site has been considered for development before and was rejected quite some time ago. I am reliably informed from various official sources that the reasons given for rejection were "arranged" as a result of power politics and vested interests to facilitate this rejection, and that this is why it is not included in the current plan, biodiversity issues being played up as part of the arrangement. It defies logic that the large area of irreplaceable productive arable land within C22/2 with its rich bio diversity and crop rotation cycles so valuable to pollinating insects which is also vitally important to so much wildlife should be sacrificed when this site off Clifton Park is available. I have also heard from these same reliable sources, difficult though it is to believe, that to promote C22/2 the most extraordinary claims are being made that development would actually improve bio diversity because of the garden areas being created. Modern developments leave little room for gardens which in the main are not insect or bird friendly. If this argument that development is good for bio diversity then surely this argument is equally valid for the infill site off Clifton Park!

In view of these allegations I would politely request that the Independent Planning Inspector examines the grounds for its previous refusal to see if the reasons for that refusal hold good with today's current need for large expansion, and that the reasons for its omission in the current plan withstands such scrutiny with regard to today's pressing needs.

If this site were to be included in the plan it would save irreplaceable productive arable land and better facilitate a more balanced proposed growth in Cromer. It would also have the following advantages:

(i) The new sports pitch could be located within Cromer parish boundary and Cromer football club could actually play in Cromer, not in another parish. The site would be within easier walking distance approximately .8 miles (1.25 km) from the town centre, much nearer than the approximate 1.4 miles (2.25km) than the current proposed site C22/2.

(ii) By locating the sports pitch here intensely lit night time activities would have no serious effect on Dark Skies and would help maintain the Dark Skies on the more remote proposed site of C22/2.

(iii) The level of traffic entering on both sides of Cromer in the long tourist season causes serious long delays and gridlock on one side of Cromer along the A149 coast road from East Runton and the A148 on one side. On the other side of Cromer the same gridlock problems entering Cromer are encountered on Cromwell Road with its input from the coast road, the A149 and the Roughton Road. The location and full development of C22/2 means that all the extra traffic arising from this development wishing to exit through Cromer could only pass through it from that side of the town. By reducing the size of C22/2 and building its balanced reduction on the land to the west of Clifton Drive it would more equally distribute the extra vehicle traffic with each site's entry into Cromer being in opposite directions traffic would now flow in opposing directions through Cromer. Implementing this proposal and sharing the size of the development of C22/2 to the land west of Clifton Park would therefore mitigate any additional congestion and strain upon an already stretched infrastructure. By adopting this proposal it would also reduce the significant risks highlighted by Highways Department with the extra traffic from nearby developments flowing along the Roughton road/Mill Lane and exiting onto the B1436.

(iv) Upon entering Clifton Park immediately to the west the first two cul-de-sacs have been left undeveloped at their ends unlike the ones higher up which have buildings at the end. The end of the second cul-de-sac has wide sweeping curves to both the left and right immediately abutting this land providing ready access to the site and no structural impediment to further development into this adjoining parcel of land. Ready access has thus already been provided for by the previous developer for further development of this site which has been left fallow and overgrown ready for just such an occasion.

(v) There is already a sound existing footpath by the side of the A149 leading directly into Cromer.

<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	<p>No, I do not wish to participate in examination hearing session(s)</p>
<p>Justification for appearing at hearing</p>	
<p>Attachment(s)</p>	

Consultation Point Title	Cromer
Consultation Point Number	10
Section of the Plan	10.0.7
ID	LPS523
Response Date	24/02/2022 12:00:00
Name	Mr William Horner
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	<p>Page 154 of the submission 10.0.7 "summarises the main considerations which influence the suggested location of development sites are the need to:"</p> <ul style="list-style-type: none"> • "Ensure a choice of sites are available to improve the prospects of delivery." • "Avoid locations which are detached from the town and not related to existing built up areas." • "Provide a large level site suitable for outdoor sport well related to the town which is accessible by walking and public transport." • "Locate developments where they are, or can be connected, to key services and the town centre preferably by walking, cycling or public transport " • "Avoid locations which would result in unacceptable impacts on the highway network." <p>I believe these "considerations" have not been far reaching enough to consider another large undeveloped site ripe for development in Cromer. For this reason I believe the plan is unjustified, fatally flawed and unsound.</p>
Modifications requested	<p>There is a large undeveloped infill scrubland site to the west of Clifton Park which is within the Cromer parish boundary. Development of this site which has two readily available prepared access sites left for further development would naturally and harmoniously extend the present building line, which, because of its size could preserve a meaningful visual gap between settlements.</p> <p>I understand this site has been considered for development before and was rejected quite some time ago. I am reliably informed that the reasons given for rejection were purely political and the reasons for rejection were "arranged" to facilitate this outcome!</p> <p>If this site were to be included in the plan and the rejection of any previous planning application rigorously reassessed in light of current demand it may better facilitate a more balanced proposed growth in Cromer and would have the following advantages:</p> <p>(i) It fulfils the majority of submission considerations by being in a location which is not detached from town, has an existing footpath, is already connected to key services, ensures a greater choice of sites to improve the prospects of delivery and provides the level site required for the sports facility which is much closer to town than the proposed site of C22/2.</p> <p>(ii) The new sports pitch could now be located within Cromer parish boundary and would be within easier walking distance being approximately .8 miles (1.25 km) from the town centre, much nearer than the approximate 1.4 miles (2.25km) than the current proposed</p>

	<p>site C22/2. The size of the plot should also ensure that a substantial important visual gap between settlements is maintained.</p> <p>(iii) By locating the sports pitch here intensely lit night time activities would have no serious effect on Dark Skies and would help maintain the Dark Skies on the more remote proposed site of C22/2.</p> <p>(iv) The level of traffic through Cromer in the long tourist season causes serious long delays and gridlock as traffic attempts to enter Cromer from all its entry points. By solely developing C22/2 (which would only have one direct access route into Cromer) all traffic from that site wishing to access Cromer would place extra stress upon an already hard pressed infrastructure. If the development of C22/2 was split between two sites-C22/2 and land adjacent to Clifton Park this should significantly reduce any additional congestion by each site having a different opposing access route through Cromer.</p> <p>(vi) Upon entering Clifton Park immediately to the west the first two cul-de-sacs have been left undeveloped at their ends unlike the ones higher up which have buildings at the end of the cul-de-sac. The end of the second cul-de-sac has wide sweeping curves to both the left and right immediately abutting this area providing no structural impediment to further development into this adjoining parcel of land. Ready access has thus already been provided for by the previous developer to develop this site which has been left fallow and overgrown ready for such an occasion!</p> <p>(vii) Since this abandoned land has been left fallow and degenerated into scrubland the few (2?) official footpaths could be easily incorporated into any future development. Point 2 above deals with Bio diversity issues and that bio diversity issues have no greater significance overall than other proposed sites.</p> <p>I believe the additional information (i) to (vii) is more closely aligned with the "considerations" of the submission plan listed above and hope it helps the independent Planning Inspector to reach a fair and balanced decision.</p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Cromer
Consultation Point Number	10
Section of the Plan	10.0.6
ID	LPS522
Response Date	24/02/2022 12:00:00
Name	Mr William Horner
Organisation	
Agent Name	
Agent Organisation	
<p>Do you consider the plan to be Legally Compliant? * Yes * No</p>	
<p>Has the duty to cooperate been met? * Yes * No</p>	
<p>Do you consider the plan to be Sound? * Yes * No</p>	No
<p>Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy</p>	It is not justified
Explanation	Page 154 of the submission 10.0.6 states that no "infill sites" are available in Cromer which necessitates building outside Cromer parish boundaries. Because the plan does not include a large undeveloped

	area of infill land within the Cromer parish I believe this to be unsound and unjustified.
Modifications requested	<p>This site has been considered for development before and was rejected quite some time ago. I am reliably informed that the reasons given for rejection were driven by purely political motives and that the reasons for rejection were "arranged" to facilitate this outcome and satisfy vested interests. Its surprising exclusion from the current plan adds weight to these allegations.</p> <p>In view of these allegations I would politely request that the Independent Planning Inspector examines the grounds for it's previous refusal to see if the reasons for that refusal hold good with today's current needs and that its omission is sound.</p> <p>By assessing current needs if this site were to be included in the plan this would better facilitate a more balanced proposed growth in Cromer and would have the following advantages:</p> <p>(i) The new sports pitch could be located within Cromer parish boundary and would be within easier walking distance, approximately .8 miles (1.25 km) from the town centre, much nearer than the approximate 1.4 miles (2.25km) than the current proposed site C22/2.</p> <p>(ii) By locating the sports pitch here intensely lit night time activities would have no serious effect on Dark Skies and would help maintain the Dark Skies on the more remote proposed site of C22/2.</p> <p>iii) The level of traffic through Cromer in the long tourist season causes serious long delays, congestion and gridlock on all the roads leading into Cromer from both sides of it's centre. If some of the development of C22/2 was split between these two sites it would reduce the extra traffic burden of these additional infrastructure problems caused by solely developing C22/2. Sharing the size of this development should therefore mitigate any additional congestion by each site having a different access route through Cromer.</p> <p>(iv) Upon entering Clifton Park immediately to the west the first two cul-de-sacs have been left undeveloped at their ends unlike the ones higher up which have buildings at the end. The end of the second cul-de-sac has wide sweeping curves to both the left and right immediately abutting this land providing no structural impediment to further development into this adjoining parcel of land. Ready access has thus already been provided for by the previous developer to develop this site which has been left fallow and overgrown ready for such an occasion!</p> <p>(v) I believe there are as few as two official footpaths here which could readily be incorporated within any development, and that bio diversity issues here would not be significantly different from some of the other proposed sites.</p> <p>(vi) This development has the advantage of being within the Cromer parish boundary and because of it's size little difficulty should be encountered from encroachment upon the East Runton parish boundary.</p> <p>(vii) There is already an existing footpath leading directly into Cromer.</p>
Appear at examination hearing session(s)?	No, I do not wish to participate in examination hearing session(s)
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Cromer
Consultation Point Number	10
Section of the Plan	10.0.8
ID	LPS524
Response Date	24/02/2022 12:00:00
Name	Mr William Horner
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	
* Yes	

* No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	The Local Plan's lack of effective guarantees in maintaining the current level of provision for infrastructure does not provide a secure and assured outcome once development begins. Because of the complete absence of any such guarantees I submit these plans must be considered unsound.
Modifications requested	<p>1) Serious doubts about the ability of the Cromer G.P. practice to cope with the extra demand must be raised. Page 155 (10.0.6) states that The Health Authority "indicates there is "LIKELY" to be sufficient capacity to support the proposed growth." Speaking personally My family has often found it difficult to get a Doctors appointment with our G.P. without a wait of sometimes up to a week or more, and this BEFORE Covid! The word "Likely" is too vague to give one confidence that the local doctors practice would cope with the extra burden placed upon it, especially with the difficulties experienced nationally with recruitment of doctors. To ensure the soundness of the plan a firm promise and commitment from The Health Authority might place the proposals in a more favourable light.</p> <p>2) Similarly, the word "Likely" in the response from the Education Authority on the same page does not engender confidence in their ability to cope with the undoubted extra demand these proposals would create. Again a firm promise and commitment from them might ensure the soundness of the plan.</p> <p>3) Anglian Water has indicated "off site water supply reinforcements will be required in certain locations and furthermore that for new developments of over 10 dwellings some enhancement to the foul sewerage network capacity will be required." Cromer is in one of the driest counties in England with the tourist trade making huge demands upon the system. I understand Anglian Water is building a new reservoir to cope with rising demand. Guarantees should be sought from Anglian Water that the system can cope with the proposed developments before such developments take place thus ensuring safe delivery of the scheme without detriment to the local population.</p> <p>4) The highway Authority has indicated network improvements associated with each of the proposals will be required. Issues with the Roughton road with planning application PO/18/1551, which is now part of the current plan C22/2 resulted in the application being denied because of irresolvable problems. At first glance these may seem to be overcome if sole access to C22/2 is via the Norwich Road, however, Cromer because of the coast road running through it creates a bottle neck for traffic and in the long tourist season gridlock is the norm in Cromer. Residents of C22/2 will no doubt soon wish to avoid the interminable wait to pass through Cromer and use an alternative route as I and so many others do. It is likely, human nature being what it is, that these residents in order to avoid long delays will exit and return C22/2 by means of Carr Lane (off the Norwich road) which leads them to Mill Road and the B1436 thus creating the very same problems that the Highways Authority found to be "irresolvable."</p> <p>There is a possible solution to this problem which is not included in the current plan. The A149 leading out of Cromer towards East Runton has a large area of infill undeveloped wasteland not included in the current plan which is ripe for development, and, because of its size could maintain visual gaps between settlements, this land is to the west of Clifton Park.</p> <p>When Clifton Park was being developed two cul-de-sacs immediately abutting this undeveloped land have been left open ended with surfaced access ready for the further development of this site which has been left fallow and is now scrubland. By reducing the size of C22/2 and placing some of that development here this should significantly reduce traffic flow along Mill Road. Because these two sites would be on either side of Cromer town centre, should it be necessary for traffic from either site to go through Cromer these two</p>

	<p>sites having such separation would lessen the accumulative congestion as the traffic would be going in opposing directions.</p> <p>This new site being much nearer Cromer town centre by a factor of approximately two than C22/2 may therefore also be more suitable for the proposed Cromer sports site having the added advantage of being within the Cromer parish boundary and having existing footpaths along if boundary.</p> <p>N.B. The only guarantee to prevent infrastructure failure within the plan is for the electricity supply.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Cromer
Consultation Point Number	10
Section of the Plan	10.0.8
ID	LPS657
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	<p>10.0.8 ... There is a general need to improve open space provision including new allotments together with improved access to the countryside.</p> <p>This does not meet the "Effective" test of soundness.</p> <p>The Plan proposes to build houses on pieces of countryside with significant wildlife value that are currently adjacent to built-up areas – and which therefore already provide access to the countryside. These include the former golf practice ground at Cromer and Pine Tree Farm.</p>
Modifications requested	The Plan should maintain existing access to the countryside.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

Policy C07/2 Land at Cromer High Station, Norwich Road

Consultation Point Title	Land at Cromer High Station, Norwich Road
Consultation Point Number	Policy C07/2
Section of the Plan	Policy C07/2 Land at Cromer High Station, Norwich Road
ID	LPS181
Response Date	23/02/2022 14:43:44
Name	Miss Naomi Chamberlain
Organisation	NPS Property Consultants on behalf of Norfolk County Council as landowner
Agent Name	
Agent Organisation	NPS Property Consultants
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	NPS Property Consultants support the inclusion of the land at Cromer High Station for housing development, which is owned by Norfolk County Council. The site is suitable and available for development and can be delivered within the Local Plan period.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land at Cromer High Station, Norwich Road
Consultation Point Number	Policy C07/2
Section of the Plan	Policy C07/2 Land at Cromer High Station, Norwich Road
ID	LPS602
Response Date	28/02/2022 15:17:00
Name	Mr David Dewbery
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	

Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>This site was previously allocated for 40 houses, and none have been built in all the years since that plan. Not only that, but the only application also that was submitted was only for 19 houses, and that was withdrawn. It's obviously a difficult site – it's got access issues and is next to industry. I don't think this is a deliverable site so shouldn't be relied on as part of this plan.</p>
Modifications requested	<p>There appears to be an overoptimistic reliance on deliverability by North Norfolk as the sites selected within Cromer plan, will be difficult, problematic and with the uncertainty of not delivering within the life of the plan, therefore other sites should be included to assist in providing flexibility and deliverability in compliance with the plan and policy. Such as site listed below:-</p> <p>As an alternative, there is another Site known as West of Roughton road, Cromer (C19/1) which should have been given more credibility during this plan process. This site has been favourably rated by the Council during site assessment and was only dismissed because Highways thought access was difficult. Since then, an alternative access has been identified and NCC Highways have confirmed it could not object and would support a development of around 85 -100 dwellings.</p> <p>This information was provided to Mark Ashwell prior to a committee meeting in which sites were considered for inclusion. But for some reason decided not to bring this to the attention of the committee during the meeting. That senior council officer personally apologised to the landowner for omitting to mention the site, despite being given the opportunity during the meeting. When it did get presented, to a later meeting, it was like an afterthought and the facts were not properly set out for consideration.</p> <p>All utilities and services are readily available to the site. AWA have confirmed that there is more than adequate sewage capacity within the Metton Road system to handle this site. The site is available for immediate delivery and would fill the gap for housing supply in the next five years before the other sites are likely to become available and start delivering urgently required homes.</p> <p>This site has many benefits and a much lower visibility impact as it can easily be screened from view. At the eastern side there is already mature houses extending the complete length of the boundary. To the northern side of the site there is an existing development of mature houses and bungalows. To the western side of the site there is a development of individual houses woodland and tree lined hedging. To the southern side there is a mature hedging and trees, visual impact when accessing Cromer along the Roughton Road would be minimal as the site falls gently away to the west providing suitable screening opportunities.</p> <p>I believe there has been a failure to assess the inclusion of sites properly and therefore the site C19/1 (accessed off Compit Hills, and not Roughton road as the committee were told) should be reconsidered based on actual current facts.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land at Cromer High Station, Norwich Road
Consultation Point Number	Policy C07/2
Section of the Plan	Policy C07/2 Land at Cromer High Station, Norwich Road
ID	LPS689
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	

Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>Sound - Subject to project level HRA.</p> <p>In line with the plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal.</p> <p>This allocation is also located within or in close proximity to the Norfolk Coast AONB. Due consideration should be taken to determine any adverse effects on the special qualities of the protected landscape. Priority habitats and species should also be considered to assess the impact of the development proposals on local wildlife, in line with paragraphs 175 and 176 of the NPPF.</p>
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Policy C16 Former Golf Practice Ground, Overstrand Road

Consultation Point Title	Former Golf Practice Ground, Overstrand Road
Consultation Point Number	Policy C16
Section of the Plan	Policy C16 Former Golf Practice Ground, Overstrand Road
ID	LPS247
Response Date	24/02/2022 16:36:00
Name	Innova Property Ltd
Organisation	Innova Property Ltd
Agent Name	Julia Edwards
Agent Organisation	Corylus
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<p>We question the deliverability of this site because:</p> <ul style="list-style-type: none"> • It has a long history of refused applications for residential development • The landowner similarly has a long history of conflict with the LPA, including enforcement action on this site • The site is currently within Core Strategy policy EN3 Undeveloped Coast <p>We question whether these factors have been properly considered – we have raised concerns re the SA/evidence base (see rep made to Section 1 of this plan)</p> <p>Our observations suggest sites south of Cromer are better located, without deliverability concerns and further from sensitive coastline and nearby village of Overstrand</p>
Modifications requested	To make plan sound: review SA/evidence base – our observations suggest sites south of Cromer are better located, without deliverability concerns and further from sensitive coastline and nearby village of Overstrand
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To facilitate the Local Plan process
Attachment(s)	
Consultation Point Title	Former Golf Practice Ground, Overstrand Road
Consultation Point Number	Policy C16
Section of the Plan	Policy C16 Former Golf Practice Ground, Overstrand Road
ID	LPS603
Response Date	28/02/2022 15:17:00
Name	Mr David Dewbery
Organisation	
Agent Name	

Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>This site has been considered for inclusion in the LDF in the past but never brought forward as there have been difficulties in negotiating with the landowner. I think that remains a concern for deliverability of this site.</p> <p>Also, some years ago there were excavations/trial holes over the site, and it was reported at the time that running sand/silt and possibly an underground aquifer were located within the site. If this was to be the case, then delivery for large-scale building work would be difficult.</p> <p>The site is currently included in the Undeveloped Coast area, and it looks like the boundary of that has just been redrawn in this plan to exclude the site. There isn't much unspoilt coast left, and not far from here, a lot of it is eroding. For all these reasons, I question whether this is an appropriate site to rely on for development in the plan.</p>
Modifications requested	<p>There appears to be an overoptimistic reliance on deliverability by North Norfolk as the sites selected within Cromer plan, will be difficult, problematic and with the uncertainty of not delivering within the life of the plan, therefore other sites should be included to assist in providing flexibility and deliverability in compliance with the plan and policy. Such as site listed below:-</p> <p>As an alternative, there is another Site known as West of Roughton road, Cromer (C19/1) which should have been given more credibility during this plan process. This site has been favourably rated by the Council during site assessment and was only dismissed because Highways thought access was difficult. Since then, an alternative access has been identified and NCC Highways have confirmed it could not object and would support a development of around 85 -100 dwellings.</p> <p>This information was provided to Mark Ashwell prior to a committee meeting in which sites were considered for inclusion. But for some reason decided not to bring this to the attention of the committee during the meeting. That senior council officer personally apologised to the landowner for omitting to mention the site, despite being given the opportunity during the meeting. When it did get presented, to a later meeting, it was like an afterthought and the facts were not properly set out for consideration.</p> <p>All utilities and services are readily available to the site. AWA have confirmed that there is more than adequate sewage capacity within the Metton Road system to handle this site. The site is available for immediate delivery and would fill the gap for housing supply in the next five years before the other sites are likely to become available and start delivering urgently required homes.</p> <p>This site has many benefits and a much lower visibility impact as it can easily be screened from view. At the eastern side there is already mature houses extending the complete length of the boundary. To the northern side of the site there is an existing development of mature houses and bungalows. To the western side of the site there is a development of individual houses woodland and tree lined hedging. To the southern side there is a mature hedging and trees, visual impact when accessing Cromer along the Roughton Road would be minimal as the site falls gently away to the west providing suitable screening opportunities.</p> <p>I believe there has been a failure to assess the inclusion of sites properly and therefore the site C19/1 (accessed off Compit Hills, and not Roughton road as the committee were told) should be reconsidered based on actual current facts.</p>
Appear at examination hearing session(s)?	

* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Former Golf Practice Ground, Overstrand Road
Consultation Point Number	Policy C16
Section of the Plan	Policy C16 Former Golf Practice Ground, Overstrand Road
ID	LPS423
Response Date	07/03/2022 14:16:00
Name	Mrs Helen Morris
Organisation	RCA Regeneration Ltd
Agent Name	Helen Morris
Agent Organisation	
Do you consider the plan to be Legally Compliant?	Yes
* Yes	
* No	
Has the duty to cooperate been met?	
* Yes	
* No	
Do you consider the plan to be Sound?	Yes
* Yes	
* No	
Reason(s) not Sound	
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	We are supportive of Policy C16 - Former Golf Practice Ground, Overstrand Road (Cromer) for the proposed allocation of approximately 150 dwellings, elderly care accommodation, public open space and associated on and off-site infrastructure as it would assist in providing a significant proportion of the required housing for this Large Growth Town.
Modifications requested	
Appear at examination hearing session(s)?	Yes, I wish to participate in hearing session(s)
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	We wish to reserve the right to attend the hearing session specific to Cromer, if possible.
Attachment(s)	
Consultation Point Title	Former Golf Practice Ground, Overstrand Road
Consultation Point Number	Policy C16
Section of the Plan	Policy C16 Former Golf Practice Ground, Overstrand Road
ID	LPS447
Response Date	07/03/2022 16:06:38
Name	Mr Robert Harbord-Hammond
Organisation	
Agent Name	Mr Satish Jassal
Agent Organisation	Satish Jassal Architects

Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	The landowner fully supports the adoption of this site for the use of residential dwellings, elderly care accommodation, public open space, and associated on and off-site infrastructure. The site is within walking distance to the town centre and located on public transportation routes. The site is in one ownership, and it is currently underutilised land. This site is the most sustainable site in Cromer and will provide a significant amount of housing and elderly care accommodation for Cromer and North Norfolk. We will work closely with North Norfolk District Council and consult with local residents to develop a suitable and sustainable plan for the site.
Modifications requested	We suggest no modifications to the Local Plan.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	We wish to take part in the hearing session to support the Local Plan, in particular, support the allocation of the Former Golf Practice Ground, Overstrand Road (C16) into the Local Plan.
Attachment(s)	
Consultation Point Title	Former Golf Practice Ground, Overstrand Road
Consultation Point Number	Policy C16
Section of the Plan	Policy C16 Former Golf Practice Ground, Overstrand Road
ID	LPS486
Response Date	07/03/2022 18:15:00
Name	
Organisation	Sutherland Homes
Agent Name	Mr Mark Singer
Agent Organisation	Barton Willmore
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	SEE ATTACHED FILE
Modifications requested	SEE ATTACHED FILE
Appear at examination hearing session(s)?	Yes, I wish to participate in hearing session(s)

* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	Please see our representations attached and submitted via email
Attachment(s)	220307 Representations to NNDC Draft Local Plan Proposed Submission Version (C16).pdf (1)
Consultation Point Title	Former Golf Practice Ground, Overstrand Road
Consultation Point Number	Policy C16
Section of the Plan	Policy C16 Former Golf Practice Ground, Overstrand Road
ID	LPS690
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	Yes
* Yes	
* No	
Has the duty to cooperate been met?	Yes
* Yes	
* No	
Do you consider the plan to be Sound?	Yes
* Yes	
* No	
Reason(s) not Sound	
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	Sound – Subject to project level HRA. In line with the plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal. This allocation is also located within or in close proximity to the Norfolk Coast AONB. Due consideration should be taken to determine any adverse effects on the special qualities of the protected landscape. Priority habitats and species should also be considered to assess the impact of the development proposals on local wildlife, in line with paragraphs 175 and 176 of the NPPF.
Modifications requested	
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Former Golf Practice Ground, Overstrand Road
Consultation Point Number	Policy C16
Section of the Plan	Policy C16 Former Golf Practice Ground, Overstrand Road
ID	LPS808
Response Date	07/03/2022 18:09:00
Name	
Organisation	Turley Planning
Agent Name	Mr

	Steve Kosky
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>5.1 This Site is proposed for allocation to facilitate the development of approximately 150 new homes, plus specialist elderly care accommodation, on the eastern side of Cromer under Policy C16 of the Draft Local Plan. The Site comprises 6.4 hectares of open and attractive coastal landscape, within 500 metres of the Overstrand Cliffs and is completely undeveloped in character, having formerly been used for outdoor sport and recreation. Whilst the Site adjoins the settlement edge and is located approximately 1 km from Cromer town centre, the Site lies wholly within the North Norfolk Coast AONB and is acknowledged in the Policy wording to be '<i>visually prominent from areas close to the Site</i>' (10.2.2). The area is also located within the Coastal Shelf as defined in the LCA.</p> <p>5.2 The rationale for the allocation in the policy wording suggests that the inevitable visual impacts of the development can be mitigated by the retention of existing hedgerows around the site noting that it is critical therefore that any new development does not form a '<i>harsh edge</i>' in this sensitive location. Consequently the policy requires '<i>careful attention to the site layout, building heights and materials in order to minimise the visual impact of the development on the Norfolk Coast Area of Outstanding Natural Beauty</i>'.</p> <p>5.3 Accordingly the policy wording recognises that there will be a visual impact on a national landscape designation, which requires substantive mitigation, resulting in a constraint to the development. However the implications of this policy are much more significant, as in reality the allocation of this Site represents a permanent loss of 6.4 ha of the AONB designation in a sensitive coastal setting of national importance. As such, it is incumbent upon the Council to fully demonstrate that the permanent removal of such land from a nationally designated site is justified. In this regard, Paragraph 176 of the NPPF requires that '<i>great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues</i>'.</p> <p>5.4 Paragraph 177 of the NPPF therefore requires that when considering applications for development within Areas of Outstanding Natural Beauty, that permission should be refused for major development, other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. This duty is equally relevant at the Plan making stage and exceptional circumstances will not exist without an assessment of the need for the development in the public interest and the impact of permitting it, or refusing it, upon the local economy.</p> <p>5.5 The Council is also required to assess the scope for developing outside the designated area, or meeting the need for the development in some other way. In practical terms this means that exceptional circumstances will not exist, where other more suitable site alternatives are available outside of the designated area. However in relation to this Site allocation we have found no evidence of the exceptional circumstances test having been undertaken nor how the public interest will be served in bringing this site forward.</p>
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s)	

* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

10.3 Mixed-Use: Land West of Pine Tree Farm (C22/2)

Consultation Point Title	Mixed-Use: Land West of Pine Tree Farm (C22/2)
Consultation Point Number	10.3
Section of the Plan	10.3 Mixed-Use: Land West of Pine Tree Farm (C22/2)
ID	LPS98
Response Date	20/02/2022 15:10:00
Name	Ron Roper
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified; It is not consistent with national policy
Explanation	<p>The Cromer pine tree plan is a AONB is protected and is a buffer zone between the parish of Roughton and Northrepps.</p> <p>Development of this site is not consistent with the NPPF:</p> <p>NPPF policy on AONBs</p> <p>'115. Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.</p> <p>116. Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:</p> <ul style="list-style-type: none"> • the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; • the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and • any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.'
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Mixed-Use: Land West of Pine Tree Farm (C22/2)
Consultation Point Number	10.3
Section of the Plan	10.3 Mixed-Use: Land West of Pine Tree Farm (C22/2)
ID	LPS256
Response Date	06/03/2022 15:02:00
Name	Mr Steven

	Hardisty
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared It is not justified
Explanation	The submission states (Page 154 10.0.6) that Cromer has no suitable infill sites available. Such a site within exists within Cromer itself and has not been included in the submission, for this reason I believe the plan to be unjustified and unsound.
Modifications requested	<ul style="list-style-type: none"> • Within Cromer's western end is a large area of undeveloped unproductive land to the west of Cromer which if developed would extend the existing building line within Cromer's parish boundary and should not infringe upon another's. • When this site was considered for development before it was rejected for what were rumoured to be vested interests and political power games. Rumour also suggests that its bio diversity issues were deliberately inflated to promote its rejection, it therefore comes as no surprise that it has been omitted from the current submission. It is hoped that the inspector re-assesses the validity of its omission in the Local Plan. <p>By including this site in the Local Plan a better distribution of growth in Cromer could be achieved and result in the improvements listed below:</p> <ol style="list-style-type: none"> 1 Cromer is a notorious bottleneck for traffic as it tries to enter and leave via all its roads, this is especially true in the prolonged tourist season. By sharing the development of C22/2 with this suggested site it would ameliorate these infrastructure problems because traffic entering Cromer from these sites would be doing so from different sides of the town. The problems encountered by Highways for which PO/18/1551 was rejected due to the dangers of entering the B1436 would be diminished by having some development away from it on the other side of town. Solely developing C22/2 would inevitably lead to drivers avoiding congested Cromer by Carr Lane or turning left at the Cromwell Road roundabout onto the Roughton Road and thus to the B1436 2 The proposed shared area for development lies to the west of Cromer along the A149 and surrounds Seacroft camping park on the south side of the road. 3 It is undeveloped and overgrown with prepared various access points and has an existing footpath along the A149 4 The new sports pitch if located here would be in Cromer parish for Cromer Football Club and be much nearer Cromer Town Centre to encourage walking. 5 By locating the sports facilities here brightly lit night time activities would have lesser impact on night skies than the more remote C22/2
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Policy C22/2 Land West of Pine Tree Farm, Norwich Road

Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS141
Response Date	23/02/2022 14:46:00
Name	Miss Naomi Chamberlain
Organisation	Norfolk County Council - Highway Authority (Major & Estate Development)
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Policy C22/2, point 2 requires the provision of a roundabout at the southern access from the site to the A149. Policy map C22/2 does not seem to include sufficient land to enable delivery of a technically acceptable, on-line roundabout at the south access to the A149.
Modifications requested	The allocation needs to be increased to include additional land further south of the proposed area and east of the A149 (Policy map C22/2), enabling provision of an on-line roundabout at the south access from the site to the A149.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS243
Response Date	24/02/2022 15:57:00
Name	Brown & Co and Corylus
Organisation	
Agent Name	Julia Edwards
Agent Organisation	Brown & Co and Corylus Planning & Environmental Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound?	No

* Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared
Explanation	SEE ATTACHED FILE NNDC Local Plan response B & C to pol 10.3
Modifications requested	SEE ATTACHED FILE NNDC Local Plan response B & C to pol 10.3
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To facilitate the Local Plan process.
Attachment(s)	NNDC Local Plan Response B and C to Pol 10.3.pdf
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS281
Response Date	01/03/2022 10:32:00
Name	Miss Jane Gardiner
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	The plan mentions a bridge or alternative over the railway line but does not go any further. Currently there is not a footpath that runs on the west side of the Norwich Road between the disused railway bridge with the Northrepps sign on it and the operational railway bridge. There is a partial footpath from Stevens Road to just past Aldis Close and then it stops. In order for people to be able to walk on the west side of Norwich Road safely consideration needs to be given to this. It is already quite difficult to cross over this road at busy times and with more traffic from the new development this will make it worse. The document states that it wants people to be able to walk or cycle to the sports facilities so a continuous footpath on the side of the road that the facility is on makes total sense for safety. With the development including housing for the elderly consideration needs to be taking into account for them to be able to access the walkways. considered for their
Modifications requested	Creating an accessible and continuous pathway on the west side of the Norwich Road will be required for complete safe access to the development for people.
Appear at examination hearing session(s)?	No, I do not wish to participate in examination hearing session(s)

* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS604
Response Date	28/02/2022 15:17:00
Name	Mr David Dewbery
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	
* Yes	
* No	
Has the duty to cooperate been met?	
* Yes	
* No	
Do you consider the plan to be Sound?	
* Yes	
* No	
Reason(s) not Sound	
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	<p>This site has several difficult and problematic issues, which may or may not be resolvable, but are not going to be fixed within the next plan period. Consequently, I would question the deliverability of this site. These important factors, include:</p> <ul style="list-style-type: none"> • All services and utilities need to cross/pass under, and a new footbridge constructed over the Norwich Cromer rail line. Negotiations with Railtrack in order to facilitate this will undoubtedly prove complicated and lengthy (as I know from past experience) and will take many years to reach a full legal agreement. • Anglian Water have also confirmed that there is no available additional capacity within the foul and surface water network serving this part of Cromer, and the pipe network terminates before the rail line, therefore access to infrastructure is not possible. • Also importantly, there is the apparent misguided assumption and reliance of three major landowners, (despite their past differences and feuds) reaching agreement to provide the appropriate parcels of land to enable construction of a new roundabout / road realignment and new highway & footpath upgrades to the main A149, this must meet and conform to Norfolk highways regulation requirements before approval. These Highway improvements would also necessitate the destruction of several oak trees which are over a hundred years old. • This site is very good grade agricultural land and in the heart of the AONB with established coppice / woodland & Mature trees /also providing a large mix of woodland habitat and home to many species of wildlife on the site.
Modifications requested	<p>There appears to be an overoptimistic reliance on deliverability by North Norfolk as the sites selected within Cromer plan, will be difficult, problematic and with the uncertainty of not delivering within the life of the plan, therefore other sites should be included to assist in providing flexibility and deliverability in compliance with the plan and policy. Such as site listed below:-</p> <p>As an alternative, there is another Site known as West of Roughton road, Cromer (C19/1) which should have been given more credibility</p>

	<p>during this plan process. This site has been favourably rated by the Council during site assessment and was only dismissed because Highways thought access was difficult. Since then, an alternative access has been identified and NCC Highways have confirmed it could not object and would support a development of around 85 -100 dwellings.</p> <p>This information was provided to Mark Ashwell prior to a committee meeting in which sites were considered for inclusion. But for some reason decided not to bring this to the attention of the committee during the meeting. That senior council officer personally apologised to the landowner for omitting to mention the site, despite being given the opportunity during the meeting. When it did get presented, to a later meeting, it was like an afterthought and the facts were not properly set out for consideration.</p> <p>All utilities and services are readily available to the site. AWA have confirmed that there is more than adequate sewage capacity within the Metton Road system to handle this site. The site is available for immediate delivery and would fill the gap for housing supply in the next five years before the other sites are likely to become available and start delivering urgently required homes.</p> <p>This site has many benefits and a much lower visibility impact as it can easily be screened from view. At the eastern side there is already mature houses extending the complete length of the boundary. To the northern side of the site there is an existing development of mature houses and bungalows. To the western side of the site there is a development of individual houses woodland and tree lined hedging. To the southern side there is a mature hedging and trees, visual impact when accessing Cromer along the Roughton Road would be minimal as the site falls gently away to the west providing suitable screening opportunities.</p> <p>I believe there has been a failure to assess the inclusion of sites properly and therefore the site C19/1 (accessed off Compit Hills, and not Roughton road as the committee were told) should be reconsidered based on actual current facts.</p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS505
Response Date	07/03/2022 21:13:00
Name	Mr Mike Jones
Organisation	Norfolk Wildlife Trust
Agent Name	
Agent Organisation	
<p>Do you consider the plan to be Legally Compliant? * Yes * No</p>	
<p>Has the duty to cooperate been met? * Yes * No</p>	
<p>Do you consider the plan to be Sound? * Yes * No</p>	No
<p>Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy</p>	It is not effective
Explanation	Due to the proximity to existing woodland on site, Beckett's Plantation, we recommend that the following is added to the policy text. 'In order

	to help buffer the existing woodland on site from indirect impacts from new housing, a stand-off distance of at least 20m should be secured from any new built development. It is recommended that delivery of Biodiversity Net Gain includes an element of natural vegetation to buffer the existing woodland edge, preferably through natural regeneration from the woodland'.
Modifications requested	Due to the proximity to existing woodland on site, Beckett's Plantation, we recommend that the following is added to the policy text. 'In order to help buffer the existing woodland on site from indirect impacts from new housing, a stand-off distance of at least 20m should be secured from any new built development. It is recommended that delivery of Biodiversity Net Gain includes an element of natural vegetation to buffer the existing woodland edge, preferably through natural regeneration from the woodland'.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS520
Response Date	23/02/2022 12:00:00
Name	Mr David Brown
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared
Explanation	Cromer's infrastructure is unable to support the current development plans for the following reasons: (1) Of the seven points raised (page 155 10.0.8) only one requires adequate safeguards before work can commence. (2) The difficulties and dangers of traffic leaving C22/2 have not been addressed. A recent planning application PO/18/1551 - the majority of the area of which now lies within C22/2 was refused because Highways could not resolve the problems of traffic leaving that site via Roughton Road and entering the B1436. Because of poor sight lines and consequent dangers to this traffic this application was refused. Developing C22/2 would create an even greater safety problem because of it's size. Traffic leaving the site and wishing to avoid Cromer's congested traffic by its exit on the Norwich road would turn to the right down Carr Lane or, to the left and up the Roughton Road, both routes leading to the same exit difficulties which highways found to be "irresolvable." Frustrated drivers take impulsive dangerous decisions. (3) Safety and lives are at stake, an alternative would be a larger development in Sheringham. Sheringham certainly does not have the

	<p>traffic congestion that Cromer has, the busy coast road passing by it not through it. Along that road (A149) past the Sheringham roundabout just past the swimming complex on the left lies an area of land adjoining it that may be more suitable for a large development.</p> <p>(4) The allocation of some 133 homes for Sheringham as opposed to some 572 in Cromer places a disproportionate strain upon the inferior infrastructure of Cromer.</p>
Modifications requested	<p>The proposed Submission Version's plans -pages 154/155 policy number 10- to develop Cromer by nearly 600 dwellings have not fully taken into account the problems of expansion by this amount. No guarantees that the authority's policy 10 involved listed on pages 154/155 10.0.8 of the submission that will ensure the infrastructure success of this expansion have been obtained, the submission is therefore not positively prepared and unsound.</p> <p>Firm guarantees must surely be given on vital services such as health, education, water, sewage and road safety issues before work can commence.</p> <p>Transferring a large part of C22/2 to Sheringham whose infrastructure is more robust than Cromer's would certainly lessen the dangers of accidents on the B1436 and lessen the strain on other services.</p>
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS592
Response Date	23/02/2022 12:00:00
Name	Mr Denis Connelly
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	
* Yes	
* No	
Has the duty to cooperate been met?	
* Yes	
* No	
Do you consider the plan to be Sound?	
* Yes	
* No	
Reason(s) not Sound	
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	<p>I am writing to give my opinion and register my opposition to the plans for the proposed developments in the North Norfolk District Councils Local Plan for the Cromer Neighbourhood. Having read the plan for this area, it seems that these proposed developments may have already been decided on to proceed. Both ours and fellow residents great concerns are, and I believe ones that should also be a main concern and consideration by the Planning Officers, out of respect for existing residents is "Do we have an adequate infrastructure" to support the additional number of people that will be moving into this area. As it stands at present, it is almost impossible to get a GP appointment if you are ill. When you telephone to make an appointment, you are lucky if you can hear the message saying that you are lower than 20 in the queue. You will normally, with the waiting time being so long, be either seriously ill or recovered by the</p>

	<p>time you can get an appointment. We do not have Dentists taking on new patients or at present looking after existing patients. Our roads, which at present are poorly maintained cannot cope with the additional volume of traffic that these developments will produce. We also are already overloaded with the amount of homes and businesses using an inadequate strength of Broadband which will worsen even more with these additional homes.</p> <p>In the plans for the new homes on the Norwich Road, they say that there will be approximately 400 new homes. Does that mean there could be 500? Also it says that there will be 100 specialist elderly person's units. Is that in addition to the approximate 400 new homes or are they part of the 400.</p> <p>Will there be restrictions on people buying them as 2nd Homes, Holiday Lets and as Buy-to-Let portfolio properties. We need to see the Council encouraging the building of many affordable homes for young first time buyers and local residents to get on the housing ladder. The three types of buyer that I have previously mentioned find it easy to get a mortgage for these houses by using their existing properties as security for further lending on which they do not have to prove their affordable, expendable income. This is inflating the price of properties taking them out of the affordable income range of first time buyers. People that want to get onto the housing ladder are finding it impossible, mainly due to them being unable to save deposits because of the extortionate rents that they are forced to pay to private Buy to Let Landlords, who only have to meet the criteria of charging multiples of the mortgage repayment as rent. These often extortionate rents in many cases have to be subsidised by the public purse in the form of Housing Benefits. This is money going into wealthy Landlords Bank Accounts that could be recycled into building new affordable Council owned homes charging fair rents. How many of these homes will be affordable? Will the construction of these be enforced? We have concerns after having previously been told by a Site Manager on another local development that the Developers can get out of building affordable housing on site by starting work on the authorised development and then telling the Local Authority that they will not be able to continue with the development as it will now be unaffordable if they have to build the affordable homes on the site? He said that they normally get away with it?</p>
Modifications requested	<p>The proposed Norwich Road development of approximately 400 new homes should, due to the infrastructure and condition of our surrounding roads, only allow vehicles to enter and exit this development, if it proceeds, via the Norwich Road (A149) and not allow any link roads to Roughton Road or the 81436. Also, while being developed, construction vehicles should only be allowed access to the site via the Norwich Road and should not be allowed to come through the B1436 or surrounding country lanes, as these roads will be unable to cope with this volume of heavy vehicles and it will be extremely dangerous for local residents, cyclists and walkers.</p> <p>As stated at the start of this letter both I and my family are totally opposed to these proposed developments and hope that yourselves as a Council respect the existing residents and do the honourable thing by not allowing these developments in this area to proceed.</p>
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS594
Response Date	23/02/2022 12:00:00
Name	Mr Benjamin Connelly
Organisation	

Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>I am writing to give my opinion and register my opposition to the plans for the proposed developments in the North Norfolk District Councils Local Plan for the Cromer Neighbourhood. Having read the plan for this area, it seems that these proposed developments may have already been decided on to proceed. Both ours and fellow residents great concerns are, and I believe ones that should also be a main concern and consideration by the Planning Officers, out of respect for existing residents is "Do we have an adequate infrastructure" to support the additional number of people that will be moving into this area. As it stands at present, it is almost impossible to get a GP appointment if you are ill. When you telephone to make an appointment, you are lucky if you can hear the message saying that you are lower than 20 in the queue. You will normally, with the waiting time being so long, be either seriously ill or recovered by the time you can get an appointment. We do not have Dentists taking on new patients or at present looking after existing patients. Our roads, which at present are poorly maintained cannot cope with the additional volume of traffic that these developments will produce. We also are already overloaded with the amount of homes and businesses using an inadequate strength of Broadband which will worsen even more with these additional homes.</p> <p>In the plans for the new homes on the Norwich Road, they say that there will be approximately 400 new homes. Does that mean there could be 500? Also it says that there will be 100 specialist elderly person's units. Is that in addition to the approximate 400 new homes or are they part of the 400.</p> <p>Will there be restrictions on people buying them as 2nd Homes, Holiday Lets and as Buy-to-Let portfolio properties. We need to see the Council encouraging the building of many affordable homes for young first time buyers and local residents to get on the housing ladder. The three types of buyer that I have previously mentioned find it easy to get a mortgage for these houses by using their existing properties as security for further lending on which they do not have to prove their affordable, expendable income. This is inflating the price of properties taking them out of the affordable income range of first time buyers. People that want to get onto the housing ladder are finding it impossible, mainly due to them being unable to save deposits because of the extortionate rents that they are forced to pay to private Buy to Let Landlords, who only have to meet the criteria of charging multiples of the mortgage repayment as rent. These often extortionate rents in many cases have to be subsidised by the public purse in the form of Housing Benefits. This is money going into wealthy Landlords Bank Accounts that could be recycled into building new affordable Council owned homes charging fair rents. How many of these homes will be affordable? Will the construction of these be enforced? We have concerns after having previously been told by a Site Manager on another local development that the Developers can get out of building affordable housing on site by starting work on the authorised development and then telling the Local Authority that they will not be able to continue with the development as it will now be unaffordable if they have to build the affordable homes on the site? He said that they normally get away with it?</p>
Modifications requested	The proposed Norwich Road development of approximately 400 new homes should, due to the infrastructure and condition of our surrounding roads, only allow vehicles to enter and exit this

	<p>development, if it proceeds, via the Norwich Road (A149) and not allow any link roads to Roughton Road or the 81436. Also, while being developed, construction vehicles should only be allowed access to the site via the Norwich Road and should not be allowed to come through the B1436 or surrounding country lanes, as these roads will be unable to cope with this volume of heavy vehicles and it will be extremely dangerous for local residents, cyclists and walkers.</p> <p>As stated at the start of this letter both I and my family are totally opposed to these proposed developments and hope that yourselves as a Council respect the existing residents and do the honourable thing by not allowing these developments in this area to proceed.</p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS556
Response Date	24/02/2022 12:00:00
Name	Mr Adam Smith
Organisation	
Agent Name	
Agent Organisation	
<p>Do you consider the plan to be Legally Compliant? * Yes * No</p>	
<p>Has the duty to cooperate been met? * Yes * No</p>	
<p>Do you consider the plan to be Sound? * Yes * No</p>	No
<p>Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy</p>	
Explanation	<p>The plan in general has a lot of excellent thoughts, ideas and projections But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.</p> <p>This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became a one-way system, this small, narrow country road has become an A road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.</p> <p>We are faced with a low-level B road taking A road streams, which the County Highways Division acknowledges that it is not safe, but there is nowhere else for the traffic to go. The land that was earmarked for a potential By Pass in previous plans has now been built on so that option is no longer there for future road infrastructure improvements.</p> <p>The fact is that the simplest and easiest decision is to base a large development on one side of the town which would signify the loss of the village of Roughton which would be swallowed and absorbed into Cromer. Yet Roughton is a village, and a development placed in the area chosen is West of Pine Tree Farm is situated in between parish boundaries Northrepps and Roughton, yet the area is labelled as Cromer. This is a false heading and misinformation and therefore</p>

makes this plan misleading and wrong, which therefore presents a false plan to the local electorate and population.

Added to this is the fact that the barriers and space between Cromer and Roughton would simply disappear and Roughton would become a suburb of Cromer and remain in name only. The submission of local and neighbourhood plans along with the stated core strategy of NNDC to protect our local heritage and villages would be dismissed at a stroke, and make the entire operation of the core strategy a joke operation to be easily dismissed and overridden for the sake of convenience and ease of producing this plan.

So where does the proposal to put 500 houses on the land west of the Norwich Road without any proper access except via a track road called Carr Lane, which comes out to a less than substantial road of Roughton Road and Mill Lane with no street lighting, drainage, with secluded house entry, hedges, coupled with insufficient vision.

The improvements required from Norwich Road with a roundabout and a footbridge over that junction or beside it is a most damaging and frightening prospect which is not protecting our heritage. It will become an urban town destroying the countryside at a stroke, which NNDC have used to refuse planning and development decisions for building a single house in which is supposed to be countryside, which is illegal under planning laws.

It will adversely affect Northrepps, Roughton, Southrepps, Felbrigg, Cromer, West & East Beckham, Gresham, Hanworth, Aldborough, West & East Runton.

All this is stipulated here, before we even look at the traffic flow along and entry and exit into the B1436 at either end.

Where this plans sits if implemented it will lead to significant and a deadly increase in traffic on B1436 and Metton / Hall road. This just simply cannot happen as it cannot be used as an A road but treated as a very poorly laid out B road.

We have no pavements for school children, no policing for speed, roads barely wide enough for two lorries, and a significant increase in farm traffic with contract farming. Lack of funding for hedge/verge cutting to make the roads safer.

We already know that the B1436 cannot ever be closed after admissions by the Director of Highways and the local Highways Spokesperson. This was admitted to the Police at a recent public meeting. The roads here can not take any more volume at all but due to this plan they will have to without an infrastructural plan. This brings us back to the basic reason of this plan being unsound. At a recent meeting the director of highways stated that there was no plans to improve the B1436 in the foreseeable future. There is no budget as stipulated and agreed by the local highways spokesman and that the situation is only going to get worse.

Residents are no longer able to walk from their properties. The only way to get anywhere is by car increasing traffic, emissions, volume and intensity.

There is also the proposed development for 30 homes down Back Lane which will ensure that cars will come to the Metton Road Junction as access to Norwich Road there with a steep uphill gradient and a right turn does not bear thinking about during rush hours at least.

Lack of infrastructure in roads to support the development continually brings the B1436 into very sharp focus and we all know that North Norfolk as a whole has very poor roads with virtually no funding being put to our roads for safety or maintenance or traffic flow improvements. Emergency services can not easily get through as no pulling in places. The number of extra people will place even more pressure on already over stretched services. Should development be permitted to go ahead the infrastructure must be in place on the Norwich road before any work on building site takes place, and clearly this plan demonstrates nothing but a few lines of pointed dismissal. Traffic using Carr Lane would need to be addressed as this road is not suitable in any way to carry cut through traffic.

The estate will need to have more affordable housing to encourage and help young people to be able to stay in their homes towns thus helping to serve the range of jobs and help care for the very large volume of elderly. This again will increase traffic volumes tremendously again and shatter those plans.

Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.

	<p>Within the plan for 500 homes here, with car ownership at approximately two per household as an average there will be a large portion of these will use the B1436 adding up to over 350,000 movements yearly.</p> <p>We have not even begun to address the increase in traffic due to tourists, who are so vital to the economy, so we are told by NNDC. If they cannot get here we are destined to have this total mess to ourselves, what a lovely prospect for us all.</p> <p>That would be the biggest abject failure of all by NNDC!!</p> <p>I would also support a 30mph speed limit.</p>
Modifications requested	Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS589
Response Date	17/02/2022 12:00:00
Name	B Cooper
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>Proposed use of arable farmland in an area of Outstanding Natural Beauty. The use of an area of ONB should surely only be considered as a complete last resort after all brown fill sites have been exhausted.</p> <p>This large development of 500 homes, sports facilities and elderly care facilities all in one place will have a huge impact on the flora and fauna of this lovely area. This area incorporates Beckett's Plantation which is a habitat for many species of animals and birds including Owls, bats, brown hares, woodpeckers, buzzards and birds of prey are regularly seen. The light pollution alone from such a large development, let alone the heavy plant traffic required in its construction will drive the wildlife away, probably permanently.</p> <p>The proposed site, will cause Carr Lane and Roughton Road to become 'rat runs' for access to the town, as there are already traffic queues right back up the Norwich Road as far as the railway bridge / Station Road junction already at peak times and horrendous queues in the visitors seasons.</p> <p>Roughton Road already has a pinch point at both ends, the bottom where it joins Norwich Road and the junction of Old Mill Lane where it joins Felbrigg Road (B1436) is already a dangerous junction.</p>

	<p>The proposed site is approx 2.5 miles from the centre of town, with an uphill gradient on a return journey. People are not going to walk or cycle this distance or wait for buses with heavy shopping and children hence more car use for shopping/ doctors/ chemist/ school runs etc.</p> <p>We do not believe that Cromer has the infrastructure to cope with such a large development in this area with only one main road through from one side of town to the other. Any serious accident or incident will cause the whole town to be deadlocked. Car parking is already completely inadequate and a big problem for locals and visitors during all the holidays / half term periods.</p> <p>The proposed development will in effect 'join' Cromer to the Parish of Roughton with no separation (Councillor Sarah Butikofer's objection relating to the proposed Clifton Park development made this objection relating to the need for a buffer zone between Cromer and East Runton).</p>
Modifications requested	
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS591
Response Date	22/02/2022 16:22:00
Name	Ms Angela Carpenter
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	
* Yes	
* No	
Has the duty to cooperate been met?	
* Yes	
* No	
Do you consider the plan to be Sound?	
* Yes	
* No	
Reason(s) not Sound	
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	<p>Regarding the proposed submission to develop land west of Pine Tree Farm, reasons to object are many, negative and all highly detrimental to Cromer. The objections far outweigh any perceived positives:</p> <ul style="list-style-type: none"> • An area of Outstanding Natural Beauty – surely to develop such a precious resource should never be considered, even if it were the last resort? In the case of this proposed development, it is far from a last resort. There is absolutely no reason for it to be on the table when existing brownfield sites have yet to be exhausted. • This site is arable farmland. When current climate issues urge us to “grow local” and rely less on carbon-heavy imports, where is the logic in developing this precious resource? With time it will sadly become even more scarce, so how can we ever justify it being developed? Once it is gone, it is gone forever. • The proposed development of 500 homes, sports facilities and elderly care facilities all in one place will have a massive detrimental impact on the flora and fauna. The farmland plus Beckett’s Wood is a natural habitat for a variety of species including a breeding pair of buzzards

(fledgling chicks are a regular sight), owls, bats, brown hares, woodpeckers, other birds of prey such as kestrel and sparrow hawks, and deer. The light pollution and continuous construction work will displace all of these species on a permanent basis.

- When this proposal was originally mooted, landowner Michael Gurney conceded that perhaps the original proposal of 300 homes was too many for this space, and he resubmitted a figure of 230. He also proposed those of us with homes adjacent to the site be gifted a strip of land along our rear gardens. He suggested that the strip be 10' wide therefore providing us with a sense of distance from the development and that this land be incorporated into our gardens. He also proposed to fence in either end of the strip to prevent pedestrian access to the rear of our homes (where there is none at the moment) and to provide planting of trees or shrubs and additional fencing as required by us.
- With the large development on Roughton Road between Norwich Road and the railway bridge, we already experience bottlenecks of traffic trying to access Norwich Road, resulting in a rat run between Old Mill Lane and Felbrigg Road. This is already a dangerous junction and a genuine hazard to vehicles trying to join the Felbrigg Road (B1436).
- Summer in Cromer is becoming more difficult and stressful with each passing year. Traffic is often gridlocked, there are severe queues in and around the town as well as the approach roads, and services and infrastructure are at breaking point. The GP surgery, dental services and hospital are under immense pressure to serve the community, with appointments often allocated weeks ahead if at all. Supermarkets are often under-stocked and sold out of basic goods in the holiday season due to the influx of visitors. Water pressures and sewerage services in and around Burnt Hills are appalling and barely fit for purpose. We have a disproportionate number of power outages and scheduled breaks in service. We cannot cope with any more homes, let alone another 500!
- The proposed site is around 2 ½ miles from the town with an uphill gradient on the return journey. People will not walk this distance or wait for buses with heavy shopping or prams, or children/elderly relatives in tow. They will resort to their cars and create even more gridlock and pollution. The development plan claims to be keen to create areas suitable for pedestrians so why not look at brownfield sites closer to town on a level gradient?
- Given the scale of this development, it will effectively join Cromer to the Parish of Roughton and also Northrepps. Councillor Sarah Butikofer's objection to the proposed Clifton Park development was it was felt that a buffer zone was needed between Cromer and East Runton. Why was this deemed so essential for Clifton Park and East Runton, but not Burnt Hills, Cromer, Roughton and Northrepps?
- Pausing on the Clifton Park proposal for a moment, why was this dismissed so readily? It is far closer to the town and on less of a gradient. Furthermore, fewer people objected than the vast swell of objections from Burnt Hills and Compit Hills previously. Would it be fair and reasonable to say that it was not based on the number of objections, but the people of Clifton Park themselves, given that a fair proportion were submitted by councillors?

Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS593
Response Date	23/02/2022 12:00:00
Name	Ms Carol Connelly
Organisation	

Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>I am writing to give my opinion and register my opposition to the plans for the proposed developments in the North Norfolk District Councils Local Plan for the Cromer Neighbourhood. Having read the plan for this area, it seems that these proposed developments may have already been decided on to proceed. Both ours and fellow residents great concerns are, and I believe ones that should also be a main concern and consideration by the Planning Officers, out of respect for existing residents is "Do we have an adequate infrastructure" to support the additional number of people that will be moving into this area. As it stands at present, it is almost impossible to get a GP appointment if you are ill. When you telephone to make an appointment, you are lucky if you can hear the message saying that you are lower than 20 in the queue. You will normally, with the waiting time being so long, be either seriously ill or recovered by the time you can get an appointment. We do not have Dentists taking on new patients or at present looking after existing patients. Our roads, which at present are poorly maintained cannot cope with the additional volume of traffic that these developments will produce. We also are already overloaded with the amount of homes and businesses using an inadequate strength of Broadband which will worsen even more with these additional homes.</p> <p>In the plans for the new homes on the Norwich Road, they say that there will be approximately 400 new homes. Does that mean there could be 500? Also it says that there will be 100 specialist elderly person's units. Is that in addition to the approximate 400 new homes or are they part of the 400.</p> <p>Will there be restrictions on people buying them as 2nd Homes, Holiday Lets and as Buy-to-Let portfolio properties. We need to see the Council encouraging the building of many affordable homes for young first time buyers and local residents to get on the housing ladder. The three types of buyer that I have previously mentioned find it easy to get a mortgage for these houses by using their existing properties as security for further lending on which they do not have to prove their affordable, expendable income. This is inflating the price of properties taking them out of the affordable income range of first time buyers. People that want to get onto the housing ladder are finding it impossible, mainly due to them being unable to save deposits because of the extortionate rents that they are forced to pay to private Buy to Let Landlords, who only have to meet the criteria of charging multiples of the mortgage repayment as rent. These often extortionate rents in many cases have to be subsidised by the public purse in the form of Housing Benefits. This is money going into wealthy Landlords Bank Accounts that could be recycled into building new affordable Council owned homes charging fair rents. How many of these homes will be affordable? Will the construction of these be enforced? We have concerns after having previously been told by a Site Manager on another local development that the Developers can get out of building affordable housing on site by starting work on the authorised development and then telling the Local Authority that they will not be able to continue with the development as it will now be unaffordable if they have to build the affordable homes on the site? He said that they normally get away with it?</p>
Modifications requested	The proposed Norwich Road development of approximately 400 new homes should, due to the infrastructure and condition of our surrounding roads, only allow vehicles to enter and exit this

	<p>development, if it proceeds, via the Norwich Road (A149) and not allow any link roads to Roughton Road or the 81436. Also, while being developed, construction vehicles should only be allowed access to the site via the Norwich Road and should not be allowed to come through the B1436 or surrounding country lanes, as these roads will be unable to cope with this volume of heavy vehicles and it will be extremely dangerous for local residents, cyclists and walkers.</p> <p>As stated at the start of this letter both I and my family are totally opposed to these proposed developments and hope that yourselves as a Council respect the existing residents and do the honourable thing by not allowing these developments in this area to proceed.</p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS595
Response Date	23/02/2022 12:00:00
Name	Ms Aimee Foster
Organisation	
Agent Name	
Agent Organisation	
<p>Do you consider the plan to be Legally Compliant? * Yes * No</p>	
<p>Has the duty to cooperate been met? * Yes * No</p>	
<p>Do you consider the plan to be Sound? * Yes * No</p>	
<p>Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy</p>	
Explanation	<p>I am writing to give my opinion and register my opposition to the plans for the proposed developments in the North Norfolk District Councils Local Plan for the Cromer Neighbourhood. Having read the plan for this area, it seems that these proposed developments may have already been decided on to proceed. Both ours and fellow residents great concerns are, and I believe ones that should also be a main concern and consideration by the Planning Officers, out of respect for existing residents is "Do we have an adequate infrastructure" to support the additional number of people that will be moving into this area. As it stands at present, it is almost impossible to get a GP appointment if you are ill. When you telephone to make an appointment, you are lucky if you can hear the message saying that you are lower than 20 in the queue. You will normally, with the waiting time being so long, be either seriously ill or recovered by the time you can get an appointment. We do not have Dentists taking on new patients or at present looking after existing patients. Our roads, which at present are poorly maintained cannot cope with the additional volume of traffic that these developments will produce. We also are already overloaded with the amount of homes and businesses using an inadequate strength of Broadband which will worsen even more with these additional homes.</p> <p>In the plans for the new homes on the Norwich Road, they say that there will be approximately 400 new homes. Does that mean there could be 500? Also it says that there will be 100 specialist elderly</p>

	<p>person's units. Is that in addition to the approximate 400 new homes or are they part of the 400.</p> <p>Will there be restrictions on people buying them as 2nd Homes, Holiday Lets and as Buy-to-Let portfolio properties. We need to see the Council encouraging the building of many affordable homes for young first time buyers and local residents to get on the housing ladder. The three types of buyer that I have previously mentioned find it easy to get a mortgage for these houses by using their existing properties as security for further lending on which they do not have to prove their affordable, expendable income. This is inflating the price of properties taking them out of the affordable income range of first time buyers. People that want to get onto the housing ladder are finding it impossible, mainly due to them being unable to save deposits because of the extortionate rents that they are forced to pay to private Buy to Let Landlords, who only have to meet the criteria of charging multiples of the mortgage repayment as rent. These often extortionate rents in many cases have to be subsidised by the public purse in the form of Housing Benefits. This is money going into wealthy Landlords Bank Accounts that could be recycled into building new affordable Council owned homes charging fair rents. How many of these homes will be affordable? Will the construction of these be enforced? We have concerns after having previously been told by a Site Manager on another local development that the Developers can get out of building affordable housing on site by starting work on the authorised development and then telling the Local Authority that they will not be able to continue with the development as it will now be unaffordable if they have to build the affordable homes on the site? He said that they normally get away with it?</p>
Modifications requested	<p>The proposed Norwich Road development of approximately 400 new homes should, due to the infrastructure and condition of our surrounding roads, only allow vehicles to enter and exit this development, if it proceeds, via the Norwich Road (A149) and not allow any link roads to Roughton Road or the 81436. Also, while being developed, construction vehicles should only be allowed access to the site via the Norwich Road and should not be allowed to come through the B1436 or surrounding country lanes, as these roads will be unable to cope with this volume of heavy vehicles and it will be extremely dangerous for local residents, cyclists and walkers.</p> <p>As stated at the start of this letter both I and my family are totally opposed to these proposed developments and hope that yourselves as a Council respect the existing residents and do the honourable thing by not allowing these developments in this area to proceed.</p>
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS557
Response Date	24/02/2022 12:00:00
Name	Ms Rosemary Shaw
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	
* Yes	
* No	
Has the duty to cooperate been met?	
* Yes	
* No	

<p>Do you consider the plan to be Sound?</p> <ul style="list-style-type: none"> * Yes * No 	<p>No</p>
<p>Reason(s) not Sound</p> <ul style="list-style-type: none"> * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy 	
<p>Explanation</p>	<p>The plan in general has a lot of excellent thoughts, ideas and projections But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.</p> <p>This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became a one-way system, this small, narrow country road has become an A road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.</p> <p>We are faced with a low-level B road taking A road streams, which the County Highways Division acknowledges that it is not safe, but there is nowhere else for the traffic to go. The land that was earmarked for a potential By Pass in previous plans has now been built on so that option is no longer there for future road infrastructure improvements.</p> <p>The fact is that the simplest and easiest decision is to base a large development on one side of the town which would signify the loss of the village of Roughton which would be swallowed and absorbed into Cromer. Yet Roughton is a village, and a development placed in the area chosen is West of Pine Tree Farm is situated in between parish boundaries Northrepps and Roughton, yet the area is labelled as Cromer. This is a false heading and misinformation and therefore makes this plan misleading and wrong, which therefore presents a false plan to the local electorate and population.</p> <p>Added to this is the fact that the barriers and space between Cromer and Roughton would simply disappear and Roughton would become a suburb of Cromer and remain in name only. The submission of local and neighbourhood plans along with the stated core strategy of NNDC to protect our local heritage and villages would be dismissed at a stroke, and make the entire operation of the core strategy a joke operation to be easily dismissed and overridden for the sake of convenience and ease of producing this plan.</p> <p>So where does the proposal to put 500 houses on the land west of the Norwich Road without any proper access except via a track road called Carr Lane, which comes out to a less than substantial road of Roughton Road and Mill Lane with no street lighting, drainage, with secluded house entry, hedges, coupled with insufficient vision.</p> <p>The improvements required from Norwich Road with a roundabout and a footbridge over that junction or beside it is a most damaging and frightening prospect which is not protecting our heritage. It will become an urban town destroying the countryside at a stroke, which NNDC have used to refuse planning and development decisions for building a single house in which is supposed to be countryside, which is illegal under planning laws.</p> <p>It will adversely affect Northrepps, Roughton, Southrepps, Felbrigg, Cromer, West & East Beckham, Gresham, Hanworth, Aldborough, West & East Runton.</p> <p>All this is stipulated here, before we even look at the traffic flow along and entry and exit into the B1436 at either end.</p> <p>Where this plans sits if implemented it will lead to significant and a deadly increase in traffic on B1436 and Metton / Hall road. This just simply cannot happen as it cannot be used as an A road but treated as a very poorly laid out B road.</p> <p>We have no pavements for school children, no policing for speed, roads barely wide enough for two lorries, and a significant increase in farm traffic with contract farming. Lack of funding for hedge/verge cutting to make the roads safer.</p> <p>We already know that the B1436 cannot ever be closed after admissions by the Director of Highways and the local Highways Spokesperson. This was admitted to the Police at a recent public meeting. The roads here can not take any more volume at all but due to this plan they will have to without an infrastructural plan. This brings us back to the basic reason of this plan being unsound. At a recent meeting the director of highways stated that there was no plans to</p>

	<p>improve the B1436 in the foreseeable future. There is no budget as stipulated and agreed by the local highways spokesman and that the situation is only going to get worse.</p> <p>Residents are no longer able to walk from their properties. The only way to get anywhere is by car increasing traffic, emissions, volume and intensity.</p> <p>There is also the proposed development for 30 homes down Back Lane which will ensure that cars will come to the Metton Road Junction as access to Norwich Road there with a steep uphill gradient and a right turn does not bear thinking about during rush hours at least.</p> <p>Lack of infrastructure in roads to support the development continually brings the B1436 into very sharp focus and we all know that North Norfolk as a whole has very poor roads with virtually no funding being put to our roads for safety or maintenance or traffic flow improvements. Emergency services can not easily get through as no pulling in places. The number of extra people will place even more pressure on already over stretched services. Should development be permitted to go ahead the infrastructure must be in place on the Norwich road before any work on building site takes place, and clearly this plan demonstrates nothing but a few lines of pointed dismissal. Traffic using Carr Lane would need to be addressed as this road is not suitable in any way to carry cut through traffic.</p> <p>The estate will need to have more affordable housing to encourage and help young people to be able to stay in their homes towns thus helping to serve the range of jobs and help care for the very large volume of elderly. This again will increase traffic volumes tremendously again and shatter those plans.</p> <p>Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.</p> <p>Within the plan for 500 homes here, with car ownership at approximately two per household as an average there will be a large portion of these will use the B1436 adding up to over 350,000 movements yearly.</p> <p>We have not even begun to address the increase in traffic due to tourists, who are so vital to the economy, so we are told by NNDC. If they cannot get here we are destined to have this total mess to ourselves, what a lovely prospect for us all.</p> <p>That would be the biggest abject failure of all by NNDC!!</p>
Modifications requested	Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS597
Response Date	24/02/2022 16:06:00
Name	Joanna & Bill Miller
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	
* Yes	
* No	
Has the duty to cooperate been met?	
* Yes	

* No	
Do you consider the plan to be Sound?	
* Yes	
* No	
Reason(s) not Sound	
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	<p>We object to these houses being built on the above mentioned land because of the impact it will have:- On the wildlife that live there. We are privileged to be able to see hares, deer, foxes, Buzzards and many species of birds. Once building work starts these will all disappear.</p> <p>On the water and sewage. During the summer our water pressure drops dramatically as it is due to the holidaymakers, how will it cope with 500 more households. The sewage can barely cope as it is without adding to it.</p> <p>On the doctors' surgery, they will need to recruit more doctors, but at the last meeting we went to it was stated that there is a national shortage of doctors, so how can they recruit more?</p> <p>On traffic, it already takes ages to get into town when the holidaymakers are here, queues up Norwich Road which barely move, more traffic will just add to our woes.</p>
Modifications requested	
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS559
Response Date	25/02/2022 12:00:00
Name	Ms Carol Storey
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	
* Yes	
* No	
Has the duty to cooperate been met?	
* Yes	
* No	
Do you consider the plan to be Sound?	No
* Yes	
* No	
Reason(s) not Sound	
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	<p>The plan in general has a lot of excellent thoughts, ideas and projections But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.</p> <p>This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became a one-way system, this small, narrow country road has become an A</p>

road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.

We are faced with a low-level B road taking A road streams, which the County Highways Division acknowledges that it is not safe, but there is nowhere else for the traffic to go. The land that was earmarked for a potential By Pass in previous plans has now been built on so that option is no longer there for future road infrastructure improvements.

The fact is that the simplest and easiest decision is to base a large development on one side of the town which would signify the loss of the village of Roughton which would be swallowed and absorbed into Cromer. Yet Roughton is a village, and a development placed in the area chosen is West of Pine Tree Farm is situated in between parish boundaries Northrepps and Roughton, yet the area is labelled as Cromer. This is a false heading and misinformation and therefore makes this plan misleading and wrong, which therefore presents a false plan to the local electorate and population.

Added to this is the fact that the barriers and space between Cromer and Roughton would simply disappear and Roughton would become a suburb of Cromer and remain in name only. The submission of local and neighbourhood plans along with the stated core strategy of NNDC to protect our local heritage and villages would be dismissed at a stroke, and make the entire operation of the core strategy a joke operation to be easily dismissed and overridden for the sake of convenience and ease of producing this plan.

So where does the proposal to put 500 houses on the land west of the Norwich Road without any proper access except via a track road called Carr Lane, which comes out to a less than substantial road of Roughton Road and Mill Lane with no street lighting, drainage, with secluded house entry, hedges, coupled with insufficient vision.

The improvements required from Norwich Road with a roundabout and a footbridge over that junction or beside it is a most damaging and frightening prospect which is not protecting our heritage. It will become an urban town destroying the countryside at a stroke, which NNDC have used to refuse planning and development decisions for building a single house in which is supposed to be countryside, which is illegal under planning laws.

It will adversely affect Northrepps, Roughton, Southrepps, Felbrigg, Cromer, West & East Beckham, Gresham, Hanworth, Aldborough, West & East Runton.

All this is stipulated here, before we even look at the traffic flow along and entry and exit into the B1436 at either end.

Where this plans sits if implemented it will lead to significant and a deadly increase in traffic on B1436 and Metton / Hall road. This just simply cannot happen as it cannot be used as an A road but treated as a very poorly laid out B road.

We have no pavements for school children, no policing for speed, roads barely wide enough for two lorries, and a significant increase in farm traffic with contract farming. Lack of funding for hedge/verge cutting to make the roads safer.

We already know that the B1436 cannot ever be closed after admissions by the Director of Highways and the local Highways Spokesperson. This was admitted to the Police at a recent public meeting. The roads here can not take any more volume at all but due to this plan they will have to without an infrastructural plan. This brings us back to the basic reason of this plan being unsound. At a recent meeting the director of highways stated that there was no plans to improve the B1436 in the foreseeable future. There is no budget as stipulated and agreed by the local highways spokesman and that the situation is only going to get worse.

Residents are no longer able to walk from their properties. The only way to get anywhere is by car increasing traffic, emissions, volume and intensity.

There is also the proposed development for 30 homes down Back Lane which will ensure that cars will come to the Metton Road Junction as access to Norwich Road there with a steep uphill gradient and a right turn does not bear thinking about during rush hours at least.

Lack of infrastructure in roads to support the development continually brings the B1436 into very sharp focus and we all know that North Norfolk as a whole has very poor roads with virtually no funding being put to our roads for safety or maintenance or traffic flow improvements. Emergency services can not easily get through as no pulling in places. The number of extra people will place even more pressure on already

	<p>over stretched services. Should development be permitted to go ahead the infrastructure must be in place on the Norwich road before any work on building site takes place, and clearly this plan demonstrates nothing but a few lines of pointed dismissal. Traffic using Carr Lane would need to be addressed as this road is not suitable in any way to carry cut through traffic.</p> <p>The estate will need to have more affordable housing to encourage and help young people to be able to stay in their homes towns thus helping to serve the range of jobs and help care for the very large volume of elderly. This again will increase traffic volumes tremendously again and shatter those plans.</p> <p>Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.</p> <p>Within the plan for 500 homes here, with car ownership at approximately two per household as an average there will be a large portion of these will use the B1436 adding up to over 350,000 movements yearly.</p> <p>We have not even begun to address the increase in traffic due to tourists, who are so vital to the economy, so we are told by NNDC. If they cannot get here we are destined to have this total mess to ourselves, what a lovely prospect for us all.</p> <p>That would be the biggest abject failure of all by NNDC!!</p>
Modifications requested	Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS561
Response Date	25/02/2022 12:00:00
Name	Ms Jean Blair
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	The plan in general has a lot of excellent thoughts, ideas and projections But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.

This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became a one-way system, this small, narrow country road has become an A road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.

We are faced with a low-level B road taking A road streams, which the County Highways Division acknowledges that it is not safe, but there is nowhere else for the traffic to go. The land that was earmarked for a potential By Pass in previous plans has now been built on so that option is no longer there for future road infrastructure improvements.

The fact is that the simplest and easiest decision is to base a large development on one side of the town which would signify the loss of the village of Roughton which would be swallowed and absorbed into Cromer. Yet Roughton is a village, and a development placed in the area chosen is West of Pine Tree Farm is situated in between parish boundaries Northrepps and Roughton, yet the area is labelled as Cromer. This is a false heading and misinformation and therefore makes this plan misleading and wrong, which therefore presents a false plan to the local electorate and population.

Added to this is the fact that the barriers and space between Cromer and Roughton would simply disappear and Roughton would become a suburb of Cromer and remain in name only. The submission of local and neighbourhood plans along with the stated core strategy of NNDC to protect our local heritage and villages would be dismissed at a stroke, and make the entire operation of the core strategy a joke operation to be easily dismissed and overridden for the sake of convenience and ease of producing this plan.

So where does the proposal to put 500 houses on the land west of the Norwich Road without any proper access except via a track road called Carr Lane, which comes out to a less than substantial road of Roughton Road and Mill Lane with no street lighting, drainage, with secluded house entry, hedges, coupled with insufficient vision.

The improvements required from Norwich Road with a roundabout and a footbridge over that junction or beside it is a most damaging and frightening prospect which is not protecting our heritage. It will become an urban town destroying the countryside at a stroke, which NNDC have used to refuse planning and development decisions for building a single house in which is supposed to be countryside, which is illegal under planning laws.

It will adversely affect Northrepps, Roughton, Southrepps, Felbrigg, Cromer, West & East Beckham, Gresham, Hanworth, Aldborough, West & East Runton.

All this is stipulated here, before we even look at the traffic flow along and entry and exit into the B1436 at either end.

Where this plans sits if implemented it will lead to significant and a deadly increase in traffic on B1436 and Metton / Hall road. This just simply cannot happen as it cannot be used as an A road but treated as a very poorly laid out B road.

We have no pavements for school children, no policing for speed, roads barely wide enough for two lorries, and a significant increase in farm traffic with contract farming. Lack of funding for hedge/verge cutting to make the roads safer.

We already know that the B1436 cannot ever be closed after admissions by the Director of Highways and the local Highways Spokesperson. This was admitted to the Police at a recent public meeting. The roads here can not take any more volume at all but due to this plan they will have to without an infrastructural plan. This brings us back to the basic reason of this plan being unsound. At a recent meeting the director of highways stated that there was no plans to improve the B1436 in the foreseeable future. There is no budget as stipulated and agreed by the local highways spokesman and that the situation is only going to get worse.

Residents are no longer able to walk from their properties. The only way to get anywhere is by car increasing traffic, emissions, volume and intensity.

There is also the proposed development for 30 homes down Back Lane which will ensure that cars will come to the Metton Road Junction as access to Norwich Road there with a steep uphill gradient and a right turn does not bear thinking about during rush hours at least.

Lack of infrastructure in roads to support the development continually brings the B1436 into very sharp focus and we all know that North Norfolk as a whole has very poor roads with virtually no funding being

	<p>put to our roads for safety or maintenance or traffic flow improvements. Emergency services can not easily get through as no pulling in places. The number of extra people will place even more pressure on already over stretched services. Should development be permitted to go ahead the infrastructure must be in place on the Norwich road before any work on building site takes place, and clearly this plan demonstrates nothing but a few lines of pointed dismissal. Traffic using Carr Lane would need to be addressed as this road is not suitable in any way to carry cut through traffic.</p> <p>The estate will need to have more affordable housing to encourage and help young people to be able to stay in their homes towns thus helping to serve the range of jobs and help care for the very large volume of elderly. This again will increase traffic volumes tremendously again and shatter those plans.</p> <p>Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.</p> <p>Within the plan for 500 homes here, with car ownership at approximately two per household as an average there will be a large portion of these will use the B1436 adding up to over 350,000 movements yearly.</p> <p>We have not even begun to address the increase in traffic due to tourists, who are so vital to the economy, so we are told by NNDC. If they cannot get here we are destined to have this total mess to ourselves, what a lovely prospect for us all.</p> <p>That would be the biggest abject failure of all by NNDC!!</p>
Modifications requested	Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS600
Response Date	25/02/2022 12:00:00
Name	Ms Teresa Swift
Organisation	B1436 Safety Awareness Group
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	The recently produced document is indeed a huge volume of work and commitment to trying to address the apparently insurmountable

problems that we face in the foreseeable future. Notwithstanding the projected age, structure of the population, and the growth expected with changes in age and distribution.

The plan in general has a lot of excellent thoughts, ideas, and projections. Projections are what they are, simply projections, and they are always subject to fluctuations in several areas, which is the main reasons that these show up in missed targets, or plans.

The main omission that shows itself in every local plan published, is that there is no joined up writing between District Councils and County Councils along with other emergency services such as Ambulance, Fire, and Police. All this along with the health authorities, shows a large void and the associated areas which cause massive and calamitous side effects being left with the answer or stipulation "That's not our problem". One cannot swipe these away with the stroke of a pen, a statement, or a rubber!

This shows itself in this Local Plan Draft Publication. The gaps are horrendous and will cause untold areas of problems which in many cases will never ever, be fixed. The best, and most long running example in north Norfolk is the 81436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's. This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became a one-way system, this small, narrow country road has become an A road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.

We are faced with a low-level B road taking A road streams, which the County Highways Division acknowledges that it is not safe, but there is nowhere else for the traffic to go. The land that was earmarked for a potential Bypass in previous plans has now been built on so that option is no longer there for future road infrastructure improvements.

So, what do we find, when we look at the latest plan to be consulted and published, we see more of the same, large amounts of homes to be built, but nothing about infrastructure? No consultations with Highways about a similar length traffic plan. This affects ambulance services, fire services, police services, and general health and practitioner services. Where is the consultation to these Authorities in this plan - nowhere? It shows the same adage "Not our problem". Well quite clearly, this is not good enough currently of what is supposed to be an integrated society. Basically, it cannot go on, and this plan in these areas is still the same old plan. It's quite simply not good enough.

We are faced with the need of providing a very large number of homes in line with Government statute requirements for future housing in an ever-increasing movement population expansion. Again, in North Norfolk especially around Cromer, we are faced with growth of a very large size merely because Cromer is identified as a large growth town.

The one disadvantage here is that the town is hemmed in by areas of outstanding natural beauty and of specific heritage interests that we as a council are pledged to protect as a core structure. Coupled with losing half of the surrounding area to the sea, this makes the choosing of sites extremely difficult and one-sided.

The fact is that the simplest and easiest decision is to base a large development on one side of the town which would signify the loss of the village of Roughton which would be swallowed and absorbed into Cromer. Yet Roughton is a village, and a development placed in the area chosen is West of Pine Tree Farm is situated in between parish boundaries Northrepps and Roughton, yet the area is labelled as Cromer. This is a false heading and misinformation and therefore makes this plan misleading and wrong, which therefore presents a false plan to the local electorate and population.

Added to this is the fact that the barriers and space between Cromer and Roughton would simply disappear and Roughton would become a suburb of Cromer and remain in name only. The submission of local and neighbourhood plans along with the stated core strategy of NNDC to protect our local heritage and villages would be dismissed at a stroke and make the entire operation of the core strategy a joke operation to be easily dismissed and overridden for the sake of convenience and ease of producing this plan. This is also overridden as the village of Runton and the town borders of Cromer have been allowed to remain intact, i.e. the exact opposite of what is proposed here, under a convenient banner.

Another reason for the area between Runton and Cromer to be left is the traffic flow to and from Cromer to Runton and the effect on children

unable to take the strain during school arrival and going home especially in the dark.

So where does the proposal to put 500 houses on the land west of the Norwich Road without any proper access except via a track road called Carr lane, which comes out to a less than substantial road of Roughton Road and Mill lane with no street lighting, drainage, with secluded house entry, hedges, coupled with insufficient vision. The access on to the Norwich Road is not wide enough to facilitate safe entry / exit onto that road with a small car, let alone articulated lorries and similar vehicles.

Commercial developers build houses first to raise the capital to build road improvements later, and then try not to get involved with road building and improvements at all making their profits for their owners and shareholders even bigger.

The improvements required from Norwich Road with a roundabout and a footbridge over that junction or beside it is a most damaging and frightening prospect which is not protecting our heritage. It will become an urban town destroying the countryside at a stroke which NNDC have used to refuse planning and development decisions for building a single house in which is supposed to be countryside, which is illegal under planning laws.

It will adversely affect Northrepps, Roughton, Southrepps, Felbrigg, Cromer, West, East Beckham, Gresham, Hanworth, Aldborough, West and East Runtons.

Why is it that there is a set of one rule for one side and a different rule for the other. One could call it hypocrisy, but maybe a judicial review would be more appropriate! For this something that might well be sorely needed here.

All this is stipulated here, before we even look at the traffic flow along and entry and exit into the B1436 at either end Where this plan sits if implemented it will lead to significant and a deadly increase in traffic on 81436 and Metton /Hall Road. This just simply cannot happen as it cannot be used as an A road but treated as a very poorly laid out B road.

We have no pavements for school children, no policing for speed, roads barely wide enough for two lorries and a significant increase in farm traffic with contract farming. lack of funding for hedge/verge cutting to make the roads safer.

We already know that the 81436 cannot ever be closed after admissions by the Director of Highways and the local Highways Spokesperson. This was admitted to the Police at a recent public meeting. The roads here cannot take any more volume at all but due to this plan they will have too without an infrastructural plan. This brings us back to the basic reason of this plan being unsound. At a recent meeting the director of highways stated that there were no plans to improve the B1436 in the foreseeable future. There is no budget as stipulated and agreed by the local highways spokesman and that the situation is only going to get worse. Residents are no longer able to walk from their properties. The only way to get anywhere is by car increasing omissions, and traffic volume and intensity.

There is also the proposed development for 30 homes down Back Lane which will ensure that cars will come to the Metton Road Junction as access to Norwich Road there with a steep uphill gradient and a right turn does not bear thinking about during rush hours at least.

Lack of infrastructure in roads to support the development continually brings the 81436 into very sharp focus and we all know that North Norfolk has very poor roads with virtually no funding being put to our roads for safety or maintenance or traffic flow improvements. Emergency services cannot easily get through as no pulling in places. The number of extra people will place even more pressure on already over stretched services. Should development be permitted to go ahead the infrastructure must be in place on the Norwich Road before any work on building site takes place, and clearly this plan demonstrates nothing but a few lines of pointed dismissal.

Carr Lane also needs to be closed one end to stop all traffic trying to cut through and to be used for resident access only, also cutting off the hope to use Roughton road as a rat run. That alone is going to dramatically increase traffic levels as soon as the road is closed. This closure must then be permanent to regulate traffic into the B1436 road. The estate will need to have more affordable housing to encourage and help young people to be able to stay in their homes towns thus helping to serve the range of jobs and help care for the very large volume of elderly. This again will increase traffic volumes tremendously again and shatter those plans.

	<p>Therefore, no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population. This must be bound in legal process and this local plan makes no ref to that.</p> <p>Within the plan for 500 homes here, with car ownership at approximately two per household as an average there will be a large portion of these will use the 81436 adding up to over 350,000 movements yearly.</p> <p>It is our belief and desire that these points are answered singularly, coherently, and publicly as well as being in the media, for that is a course we shall use objectively, professionally and with purpose. As said, we are even thinking of a judicial review, as there are so many points and miscalculations, along with no inter service co-operation. This local plan is flawed for this area of North Norfolk.</p> <p>We have not even begun to address the increase in traffic due to tourists, who are so vital to the economy, so we are told by NNDC. If they cannot get here, we are destined to have this total mess to ourselves, what a lovely prospect for us all. That would be the biggest abject failure of all by NNDC!</p> <p>One important thing to add to this is we will need viability checks to surface water and flooding, that land runs downhill to the B1436 as does back lane.</p> <p>The present application for houses in back lane Roughton is being contested by the lead local flood authority who maintains an objection to that application of 30 houses.</p> <p>While we understand the flood water run off should not affect the B1436 road along back lane and Metton Road junction we, however, cannot be sure for Carr Lane/ Mill Road running down into the 81436.</p>
Modifications requested	Therefore, no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population. This must be bound in legal process and this local plan makes no ref to that.
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS558
Response Date	25/02/2022 12:00:00
Name	Brenda & Bertram Durrant
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	
* Yes	
* No	
Has the duty to cooperate been met?	
* Yes	
* No	
Do you consider the plan to be Sound?	No
* Yes	
* No	
Reason(s) not Sound	
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	The plan in general has a lot of excellent thoughts, ideas and projections But there are a lot of omissions. The best, and most long

running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.

This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became a one-way system, this small, narrow country road has become an A road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.

We are faced with a low-level B road taking A road streams, which the County Highways Division acknowledges that it is not safe, but there is nowhere else for the traffic to go. The land that was earmarked for a potential By Pass in previous plans has now been built on so that option is no longer there for future road infrastructure improvements.

The fact is that the simplest and easiest decision is to base a large development on one side of the town which would signify the loss of the village of Roughton which would be swallowed and absorbed into Cromer. Yet Roughton is a village, and a development placed in the area chosen is West of Pine Tree Farm is situated in between parish boundaries Northrepps and Roughton, yet the area is labelled as Cromer. This is a false heading and misinformation and therefore makes this plan misleading and wrong, which therefore presents a false plan to the local electorate and population.

Added to this is the fact that the barriers and space between Cromer and Roughton would simply disappear and Roughton would become a suburb of Cromer and remain in name only. The submission of local and neighbourhood plans along with the stated core strategy of NNDC to protect our local heritage and villages would be dismissed at a stroke, and make the entire operation of the core strategy a joke operation to be easily dismissed and overridden for the sake of convenience and ease of producing this plan.

So where does the proposal to put 500 houses on the land west of the Norwich Road without any proper access except via a track road called Carr Lane, which comes out to a less than substantial road of Roughton Road and Mill Lane with no street lighting, drainage, with secluded house entry, hedges, coupled with insufficient vision.

The improvements required from Norwich Road with a roundabout and a footbridge over that junction or beside it is a most damaging and frightening prospect which is not protecting our heritage. It will become an urban town destroying the countryside at a stroke, which NNDC have used to refuse planning and development decisions for building a single house in which is supposed to be countryside, which is illegal under planning laws.

It will adversely affect Northrepps, Roughton, Southrepps, Felbrigg, Cromer, West & East Beckham, Gresham, Hanworth, Aldborough, West & East Runton.

All this is stipulated here, before we even look at the traffic flow along and entry and exit into the B1436 at either end.

Where this plans sits if implemented it will lead to significant and a deadly increase in traffic on B1436 and Metton / Hall road. This just simply cannot happen as it cannot be used as an A road but treated as a very poorly laid out B road.

We have no pavements for school children, no policing for speed, roads barely wide enough for two lorries, and a significant increase in farm traffic with contract farming. Lack of funding for hedge/verge cutting to make the roads safer.

We already know that the B1436 cannot ever be closed after admissions by the Director of Highways and the local Highways Spokesperson. This was admitted to the Police at a recent public meeting. The roads here can not take any more volume at all but due to this plan they will have to without an infrastructural plan. This brings us back to the basic reason of this plan being unsound. At a recent meeting the director of highways stated that there was no plans to improve the B1436 in the foreseeable future. There is no budget as stipulated and agreed by the local highways spokesman and that the situation is only going to get worse.

Residents are no longer able to walk from their properties. The only way to get anywhere is by car increasing traffic, emissions, volume and intensity.

There is also the proposed development for 30 homes down Back Lane which will ensure that cars will come to the Metton Road Junction as access to Norwich Road there with a steep uphill gradient and a right turn does not bear thinking about during rush hours at least.

	<p>Lack of infrastructure in roads to support the development continually brings the B1436 into very sharp focus and we all know that North Norfolk as a whole has very poor roads with virtually no funding being put to our roads for safety or maintenance or traffic flow improvements. Emergency services can not easily get through as no pulling in places. The number of extra people will place even more pressure on already over stretched services. Should development be permitted to go ahead the infrastructure must be in place on the Norwich road before any work on building site takes place, and clearly this plan demonstrates nothing but a few lines of pointed dismissal. Traffic using Carr Lane would need to be addressed as this road is not suitable in any way to carry cut through traffic.</p> <p>The estate will need to have more affordable housing to encourage and help young people to be able to stay in their homes towns thus helping to serve the range of jobs and help care for the very large volume of elderly. This again will increase traffic volumes tremendously again and shatter those plans.</p> <p>Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.</p> <p>Within the plan for 500 homes here, with car ownership at approximately two per household as an average there will be a large portion of these will use the B1436 adding up to over 350,000 movements yearly.</p> <p>We have not even begun to address the increase in traffic due to tourists, who are so vital to the economy, so we are told by NNDC. If they cannot get here we are destined to have this total mess to ourselves, what a lovely prospect for us all.</p> <p>That would be the biggest abject failure of all by NNDC!!</p>
Modifications requested	Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS560
Response Date	25/02/2022 12:00:00
Name	Ms Faye Gower-Smith
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	

Explanation

The plan in general has a lot of excellent thoughts, ideas and projections. But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.

This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became a one-way system, this small, narrow country road has become an A road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.

We are faced with a low-level B road taking A road streams, which the County Highways Division acknowledges that it is not safe, but there is nowhere else for the traffic to go. The land that was earmarked for a potential By Pass in previous plans has now been built on so that option is no longer there for future road infrastructure improvements.

The fact is that the simplest and easiest decision is to base a large development on one side of the town which would signify the loss of the village of Roughton which would be swallowed and absorbed into Cromer. Yet Roughton is a village, and a development placed in the area chosen is West of Pine Tree Farm is situated in between parish boundaries Northrepps and Roughton, yet the area is labelled as Cromer. This is a false heading and misinformation and therefore makes this plan misleading and wrong, which therefore presents a false plan to the local electorate and population.

Added to this is the fact that the barriers and space between Cromer and Roughton would simply disappear and Roughton would become a suburb of Cromer and remain in name only. The submission of local and neighbourhood plans along with the stated core strategy of NNDC to protect our local heritage and villages would be dismissed at a stroke, and make the entire operation of the core strategy a joke operation to be easily dismissed and overridden for the sake of convenience and ease of producing this plan.

So where does the proposal to put 500 houses on the land west of the Norwich Road without any proper access except via a track road called Carr Lane, which comes out to a less than substantial road of Roughton Road and Mill Lane with no street lighting, drainage, with secluded house entry, hedges, coupled with insufficient vision.

The improvements required from Norwich Road with a roundabout and a footbridge over that junction or beside it is a most damaging and frightening prospect which is not protecting our heritage. It will become an urban town destroying the countryside at a stroke, which NNDC have used to refuse planning and development decisions for building a single house in which is supposed to be countryside, which is illegal under planning laws.

It will adversely affect Northrepps, Roughton, Southrepps, Felbrigg, Cromer, West & East Beckham, Gresham, Hanworth, Aldborough, West & East Runton.

All this is stipulated here, before we even look at the traffic flow along and entry and exit into the B1436 at either end.

Where this plan sits if implemented it will lead to significant and a deadly increase in traffic on B1436 and Metton / Hall road. This just simply cannot happen as it cannot be used as an A road but treated as a very poorly laid out B road.

We have no pavements for school children, no policing for speed, roads barely wide enough for two lorries, and a significant increase in farm traffic with contract farming. Lack of funding for hedge/verge cutting to make the roads safer.

We already know that the B1436 cannot ever be closed after admissions by the Director of Highways and the local Highways Spokesperson. This was admitted to the Police at a recent public meeting. The roads here can not take any more volume at all but due to this plan they will have to without an infrastructural plan. This brings us back to the basic reason of this plan being unsound. At a recent meeting the director of highways stated that there was no plans to improve the B1436 in the foreseeable future. There is no budget as stipulated and agreed by the local highways spokesman and that the situation is only going to get worse.

Residents are no longer able to walk from their properties. The only way to get anywhere is by car increasing traffic, emissions, volume and intensity.

There is also the proposed development for 30 homes down Back Lane which will ensure that cars will come to the Metton Road Junction

	<p>as access to Norwich Road there with a steep uphill gradient and a right turn does not bear thinking about during rush hours at least.</p> <p>Lack of infrastructure in roads to support the development continually brings the B1436 into very sharp focus and we all know that North Norfolk as a whole has very poor roads with virtually no funding being put to our roads for safety or maintenance or traffic flow improvements. Emergency services can not easily get through as no pulling in places. The number of extra people will place even more pressure on already over stretched services. Should development be permitted to go ahead the infrastructure must be in place on the Norwich road before any work on building site takes place, and clearly this plan demonstrates nothing but a few lines of pointed dismissal. Traffic using Carr Lane would need to be addressed as this road is not suitable in any way to carry cut through traffic.</p> <p>The estate will need to have more affordable housing to encourage and help young people to be able to stay in their homes towns thus helping to serve the range of jobs and help care for the very large volume of elderly. This again will increase traffic volumes tremendously again and shatter those plans.</p> <p>Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.</p> <p>Within the plan for 500 homes here, with car ownership at approximately two per household as an average there will be a large portion of these will use the B1436 adding up to over 350,000 movements yearly.</p> <p>We have not even begun to address the increase in traffic due to tourists, who are so vital to the economy, so we are told by NNDC. If they cannot get here we are destined to have this total mess to ourselves, what a lovely prospect for us all.</p> <p>That would be the biggest abject failure of all by NNDC!!</p>
Modifications requested	Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS562
Response Date	25/02/2022 12:00:00
Name	Ms Maggie Pennington
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective	

* It is not justified
 * It is not consistent with national policy

Explanation

The plan in general has a lot of excellent thoughts, ideas and projections. But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.

This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became a one-way system, this small, narrow country road has become an A road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.

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Added to this is the fact that the barriers and space between Cromer and Roughton would simply disappear and Roughton would become a suburb of Cromer and remain in name only. The submission of local and neighbourhood plans along with the stated core strategy of NNDC to protect our local heritage and villages would be dismissed at a stroke, and make the entire operation of the core strategy a joke operation to be easily dismissed and overridden for the sake of convenience and ease of producing this plan.

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The improvements required from Norwich Road with a roundabout and a footbridge over that junction or beside it is a most damaging and frightening prospect which is not protecting our heritage. It will become an urban town destroying the countryside at a stroke, which NNDC have used to refuse planning and development decisions for building a single house in which is supposed to be countryside, which is illegal under planning laws.

It will adversely affect Northrepps, Roughton, Southrepps, Felbrigg, Cromer, West & East Beckham, Gresham, Hanworth, Aldborough, West & East Runton.

All this is stipulated here, before we even look at the traffic flow along and entry and exit into the B1436 at either end.

Where this plan sits if implemented it will lead to significant and a deadly increase in traffic on B1436 and Metton / Hall road. This just simply cannot happen as it cannot be used as an A road but treated as a very poorly laid out B road.

We have no pavements for school children, no policing for speed, roads barely wide enough for two lorries, and a significant increase in farm traffic with contract farming. Lack of funding for hedge/verge cutting to make the roads safer.

We already know that the B1436 cannot ever be closed after admissions by the Director of Highways and the local Highways Spokesperson. This was admitted to the Police at a recent public meeting. The roads here can not take any more volume at all but due to this plan they will have to without an infrastructural plan. This brings us back to the basic reason of this plan being unsound. At a recent meeting the director of highways stated that there was no plans to improve the B1436 in the foreseeable future. There is no budget as stipulated and agreed by the local highways spokesman and that the situation is only going to get worse.

Residents are no longer able to walk from their properties. The only way to get anywhere is by car increasing traffic, emissions, volume and intensity.

	<p>There is also the proposed development for 30 homes down Back Lane which will ensure that cars will come to the Metton Road Junction as access to Norwich Road there with a steep uphill gradient and a right turn does not bear thinking about during rush hours at least.</p> <p>Lack of infrastructure in roads to support the development continually brings the B1436 into very sharp focus and we all know that North Norfolk as a whole has very poor roads with virtually no funding being put to our roads for safety or maintenance or traffic flow improvements. Emergency services can not easily get through as no pulling in places. The number of extra people will place even more pressure on already over stretched services. Should development be permitted to go ahead the infrastructure must be in place on the Norwich road before any work on building site takes place, and clearly this plan demonstrates nothing but a few lines of pointed dismissal. Traffic using Carr Lane would need to be addressed as this road is not suitable in any way to carry cut through traffic.</p> <p>The estate will need to have more affordable housing to encourage and help young people to be able to stay in their homes towns thus helping to serve the range of jobs and help care for the very large volume of elderly. This again will increase traffic volumes tremendously again and shatter those plans.</p> <p>Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.</p> <p>Within the plan for 500 homes here, with car ownership at approximately two per household as an average there will be a large portion of these will use the B1436 adding up to over 350,000 movements yearly.</p> <p>We have not even begun to address the increase in traffic due to tourists, who are so vital to the economy, so we are told by NNDC. If they cannot get here we are destined to have this total mess to ourselves, what a lovely prospect for us all.</p> <p>That would be the biggest abject failure of all by NNDC!!</p>
Modifications requested	Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS564
Response Date	25/02/2022 12:00:00
Name	P Osborne & W King
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared	

- * **It is not effective**
- * **It is not justified**
- * **It is not consistent with national policy**

Explanation

The plan in general has a lot of excellent thoughts, ideas and projections But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.

This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became a one-way system, this small, narrow country road has become an A road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.

We are faced with a low-level B road taking A road streams, which the County Highways Division acknowledges that it is not safe, but there is nowhere else for the traffic to go. The land that was earmarked for a potential By Pass in previous plans has now been built on so that option is no longer there for future road infrastructure improvements.

The fact is that the simplest and easiest decision is to base a large development on one side of the town which would signify the loss of the village of Roughton which would be swallowed and absorbed into Cromer. Yet Roughton is a village, and a development placed in the area chosen is West of Pine Tree Farm is situated in between parish boundaries Northrepps and Roughton, yet the area is labelled as Cromer. This is a false heading and misinformation and therefore makes this plan misleading and wrong, which therefore presents a false plan to the local electorate and population.

Added to this is the fact that the barriers and space between Cromer and Roughton would simply disappear and Roughton would become a suburb of Cromer and remain in name only. The submission of local and neighbourhood plans along with the stated core strategy of NNDC to protect our local heritage and villages would be dismissed at a stroke, and make the entire operation of the core strategy a joke operation to be easily dismissed and overridden for the sake of convenience and ease of producing this plan.

So where does the proposal to put 500 houses on the land west of the Norwich Road without any proper access except via a track road called Carr Lane, which comes out to a less than substantial road of Roughton Road and Mill Lane with no street lighting, drainage, with secluded house entry, hedges, coupled with insufficient vision.

The improvements required from Norwich Road with a roundabout and a footbridge over that junction or beside it is a most damaging and frightening prospect which is not protecting our heritage. It will become an urban town destroying the countryside at a stroke, which NNDC have used to refuse planning and development decisions for building a single house in which is supposed to be countryside, which is illegal under planning laws.

It will adversely affect Northrepps, Roughton, Southrepps, Felbrigg, Cromer, West & East Beckham, Gresham, Hanworth, Aldborough, West & East Runton.

All this is stipulated here, before we even look at the traffic flow along and entry and exit into the B1436 at either end.

Where this plans sits if implemented it will lead to significant and a deadly increase in traffic on B1436 and Metton / Hall road. This just simply cannot happen as it cannot be used as an A road but treated as a very poorly laid out B road.

We have no pavements for school children, no policing for speed, roads barely wide enough for two lorries, and a significant increase in farm traffic with contract farming. Lack of funding for hedge/verge cutting to make the roads safer.

We already know that the B1436 cannot ever be closed after admissions by the Director of Highways and the local Highways Spokesperson. This was admitted to the Police at a recent public meeting. The roads here can not take any more volume at all but due to this plan they will have to without an infrastructural plan. This brings us back to the basic reason of this plan being unsound. At a recent meeting the director of highways stated that there was no plans to improve the B1436 in the foreseeable future. There is no budget as stipulated and agreed by the local highways spokesman and that the situation is only going to get worse.

	<p>Residents are no longer able to walk from their properties. The only way to get anywhere is by car increasing traffic, emissions, volume and intensity.</p> <p>There is also the proposed development for 30 homes down Back Lane which will ensure that cars will come to the Metton Road Junction as access to Norwich Road there with a steep uphill gradient and a right turn does not bear thinking about during rush hours at least.</p> <p>Lack of infrastructure in roads to support the development continually brings the B1436 into very sharp focus and we all know that North Norfolk as a whole has very poor roads with virtually no funding being put to our roads for safety or maintenance or traffic flow improvements. Emergency services can not easily get through as no pulling in places. The number of extra people will place even more pressure on already over stretched services. Should development be permitted to go ahead the infrastructure must be in place on the Norwich road before any work on building site takes place, and clearly this plan demonstrates nothing but a few lines of pointed dismissal. Traffic using Carr Lane would need to be addressed as this road is not suitable in any way to carry cut through traffic.</p> <p>The estate will need to have more affordable housing to encourage and help young people to be able to stay in their homes towns thus helping to serve the range of jobs and help care for the very large volume of elderly. This again will increase traffic volumes tremendously again and shatter those plans.</p> <p>Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.</p> <p>Within the plan for 500 homes here, with car ownership at approximately two per household as an average there will be a large portion of these will use the B1436 adding up to over 350,000 movements yearly.</p> <p>We have not even begun to address the increase in traffic due to tourists, who are so vital to the economy, so we are told by NNDC. If they cannot get here we are destined to have this total mess to ourselves, what a lovely prospect for us all.</p> <p>That would be the biggest abject failure of all by NNDC!!</p>
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Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS566
Response Date	25/02/2022 12:00:00
Name	Ms Sarah Faulkes
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound?	No

<ul style="list-style-type: none"> * Yes * No 	
<p>Reason(s) not Sound</p> <ul style="list-style-type: none"> * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy 	
<p>Explanation</p>	<p>The plan in general has a lot of excellent thoughts, ideas and projections But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.</p> <p>This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became a one-way system, this small, narrow country road has become an A road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.</p> <p>We are faced with a low-level B road taking A road streams, which the County Highways Division acknowledges that it is not safe, but there is nowhere else for the traffic to go. The land that was earmarked for a potential By Pass in previous plans has now been built on so that option is no longer there for future road infrastructure improvements.</p> <p>The fact is that the simplest and easiest decision is to base a large development on one side of the town which would signify the loss of the village of Roughton which would be swallowed and absorbed into Cromer. Yet Roughton is a village, and a development placed in the area chosen is West of Pine Tree Farm is situated in between parish boundaries Northrepps and Roughton, yet the area is labelled as Cromer. This is a false heading and misinformation and therefore makes this plan misleading and wrong, which therefore presents a false plan to the local electorate and population.</p> <p>Added to this is the fact that the barriers and space between Cromer and Roughton would simply disappear and Roughton would become a suburb of Cromer and remain in name only. The submission of local and neighbourhood plans along with the stated core strategy of NNDC to protect our local heritage and villages would be dismissed at a stroke, and make the entire operation of the core strategy a joke operation to be easily dismissed and overridden for the sake of convenience and ease of producing this plan.</p> <p>So where does the proposal to put 500 houses on the land west of the Norwich Road without any proper access except via a track road called Carr Lane, which comes out to a less than substantial road of Roughton Road and Mill Lane with no street lighting, drainage, with secluded house entry, hedges, coupled with insufficient vision.</p> <p>The improvements required from Norwich Road with a roundabout and a footbridge over that junction or beside it is a most damaging and frightening prospect which is not protecting our heritage. It will become an urban town destroying the countryside at a stroke, which NNDC have used to refuse planning and development decisions for building a single house in which is supposed to be countryside, which is illegal under planning laws.</p> <p>It will adversely affect Northrepps, Roughton, Southrepps, Felbrigg, Cromer, West & East Beckham, Gresham, Hanworth, Aldborough, West & East Runton.</p> <p>All this is stipulated here, before we even look at the traffic flow along and entry and exit into the B1436 at either end.</p> <p>Where this plans sits if implemented it will lead to significant and a deadly increase in traffic on B1436 and Metton / Hall road. This just simply cannot happen as it cannot be used as an A road but treated as a very poorly laid out B road.</p> <p>We have no pavements for school children, no policing for speed, roads barely wide enough for two lorries, and a significant increase in farm traffic with contract farming. Lack of funding for hedge/verge cutting to make the roads safer.</p> <p>We already know that the B1436 cannot ever be closed after admissions by the Director of Highways and the local Highways Spokesperson. This was admitted to the Police at a recent public meeting. The roads here can not take any more volume at all but due to this plan they will have to without an infrastructural plan. This brings us back to the basic reason of this plan being unsound. At a recent meeting the director of highways stated that there was no plans to improve the B1436 in the foreseeable future. There is no budget as</p>

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Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS568
Response Date	25/02/2022 12:00:00
Name	Ms Theresa Ball
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes	

<p>* No</p>	
<p>Do you consider the plan to be Sound? * Yes * No</p>	<p>No</p>
<p>Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy</p>	
<p>Explanation</p>	<p>The plan in general has a lot of excellent thoughts, ideas and projections But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.</p> <p>This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became a one-way system, this small, narrow country road has become an A road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.</p> <p>We are faced with a low-level B road taking A road streams, which the County Highways Division acknowledges that it is not safe, but there is nowhere else for the traffic to go. The land that was earmarked for a potential By Pass in previous plans has now been built on so that option is no longer there for future road infrastructure improvements.</p> <p>The fact is that the simplest and easiest decision is to base a large development on one side of the town which would signify the loss of the village of Roughton which would be swallowed and absorbed into Cromer. Yet Roughton is a village, and a development placed in the area chosen is West of Pine Tree Farm is situated in between parish boundaries Northrepps and Roughton, yet the area is labelled as Cromer. This is a false heading and misinformation and therefore makes this plan misleading and wrong, which therefore presents a false plan to the local electorate and population.</p> <p>Added to this is the fact that the barriers and space between Cromer and Roughton would simply disappear and Roughton would become a suburb of Cromer and remain in name only. The submission of local and neighbourhood plans along with the stated core strategy of NNDC to protect our local heritage and villages would be dismissed at a stroke, and make the entire operation of the core strategy a joke operation to be easily dismissed and overridden for the sake of convenience and ease of producing this plan.</p> <p>So where does the proposal to put 500 houses on the land west of the Norwich Road without any proper access except via a track road called Carr Lane, which comes out to a less than substantial road of Roughton Road and Mill Lane with no street lighting, drainage, with secluded house entry, hedges, coupled with insufficient vision.</p> <p>The improvements required from Norwich Road with a roundabout and a footbridge over that junction or beside it is a most damaging and frightening prospect which is not protecting our heritage. It will become an urban town destroying the countryside at a stroke, which NNDC have used to refuse planning and development decisions for building a single house in which is supposed to be countryside, which is illegal under planning laws.</p> <p>It will adversely affect Northrepps, Roughton, Southrepps, Felbrigg, Cromer, West & East Beckham, Gresham, Hanworth, Aldborough, West & East Runton.</p> <p>All this is stipulated here, before we even look at the traffic flow along and entry and exit into the B1436 at either end.</p> <p>Where this plans sits if implemented it will lead to significant and a deadly increase in traffic on B1436 and Metton / Hall road. This just simply cannot happen as it cannot be used as an A road but treated as a very poorly laid out B road.</p> <p>We have no pavements for school children, no policing for speed, roads barely wide enough for two lorries, and a significant increase in farm traffic with contract farming. Lack of funding for hedge/verge cutting to make the roads safer.</p> <p>We already know that the B1436 cannot ever be closed after admissions by the Director of Highways and the local Highways Spokesperson. This was admitted to the Police at a recent public meeting. The roads here can not take any more volume at all but due to this plan they will have to without an infrastructural plan. This brings</p>

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Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS570
Response Date	28/02/2022 12:00:00
Name	D Evans
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	

<p>Has the duty to cooperate been met?</p> <ul style="list-style-type: none"> * Yes * No 	
<p>Do you consider the plan to be Sound?</p> <ul style="list-style-type: none"> * Yes * No 	No
<p>Reason(s) not Sound</p> <ul style="list-style-type: none"> * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy 	
<p>Explanation</p>	<p>The plan in general has a lot of excellent thoughts, ideas and projections But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.</p> <p>This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became a one-way system, this small, narrow country road has become an A road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.</p> <p>We are faced with a low-level B road taking A road streams, which the County Highways Division acknowledges that it is not safe, but there is nowhere else for the traffic to go. The land that was earmarked for a potential By Pass in previous plans has now been built on so that option is no longer there for future road infrastructure improvements.</p> <p>The fact is that the simplest and easiest decision is to base a large development on one side of the town which would signify the loss of the village of Roughton which would be swallowed and absorbed into Cromer. Yet Roughton is a village, and a development placed in the area chosen is West of Pine Tree Farm is situated in between parish boundaries Northrepps and Roughton, yet the area is labelled as Cromer. This is a false heading and misinformation and therefore makes this plan misleading and wrong, which therefore presents a false plan to the local electorate and population.</p> <p>Added to this is the fact that the barriers and space between Cromer and Roughton would simply disappear and Roughton would become a suburb of Cromer and remain in name only. The submission of local and neighbourhood plans along with the stated core strategy of NNDC to protect our local heritage and villages would be dismissed at a stroke, and make the entire operation of the core strategy a joke operation to be easily dismissed and overridden for the sake of convenience and ease of producing this plan.</p> <p>So where does the proposal to put 500 houses on the land west of the Norwich Road without any proper access except via a track road called Carr Lane, which comes out to a less than substantial road of Roughton Road and Mill Lane with no street lighting, drainage, with secluded house entry, hedges, coupled with insufficient vision.</p> <p>The improvements required from Norwich Road with a roundabout and a footbridge over that junction or beside it is a most damaging and frightening prospect which is not protecting our heritage. It will become an urban town destroying the countryside at a stroke, which NNDC have used to refuse planning and development decisions for building a single house in which is supposed to be countryside, which is illegal under planning laws.</p> <p>It will adversely affect Northrepps, Roughton, Southrepps, Felbrigg, Cromer, West & East Beckham, Gresham, Hanworth, Aldborough, West & East Runton.</p> <p>All this is stipulated here, before we even look at the traffic flow along and entry and exit into the B1436 at either end.</p> <p>Where this plans sits if implemented it will lead to significant and a deadly increase in traffic on B1436 and Metton / Hall road. This just simply cannot happen as it cannot be used as an A road but treated as a very poorly laid out B road.</p> <p>We have no pavements for school children, no policing for speed, roads barely wide enough for two lorries, and a significant increase in farm traffic with contract farming. Lack of funding for hedge/verge cutting to make the roads safer.</p> <p>We already know that the B1436 cannot ever be closed after admissions by the Director of Highways and the local Highways Spokesperson. This was admitted to the Police at a recent public</p>

	<p>meeting. The roads here can not take any more volume at all but due to this plan they will have to without an infrastructural plan. This brings us back to the basic reason of this plan being unsound. At a recent meeting the director of highways stated that there was no plans to improve the B1436 in the foreseeable future. There is no budget as stipulated and agreed by the local highways spokesman and that the situation is only going to get worse.</p> <p>Residents are no longer able to walk from their properties. The only way to get anywhere is by car increasing traffic, emissions, volume and intensity.</p> <p>There is also the proposed development for 30 homes down Back Lane which will ensure that cars will come to the Metton Road Junction as access to Norwich Road there with a steep uphill gradient and a right turn does not bear thinking about during rush hours at least.</p> <p>Lack of infrastructure in roads to support the development continually brings the B1436 into very sharp focus and we all know that North Norfolk as a whole has very poor roads with virtually no funding being put to our roads for safety or maintenance or traffic flow improvements. Emergency services can not easily get through as no pulling in places. The number of extra people will place even more pressure on already over stretched services. Should development be permitted to go ahead the infrastructure must be in place on the Norwich road before any work on building site takes place, and clearly this plan demonstrates nothing but a few lines of pointed dismissal. Traffic using Carr Lane would need to be addressed as this road is not suitable in any way to carry cut through traffic.</p> <p>The estate will need to have more affordable housing to encourage and help young people to be able to stay in their homes towns thus helping to serve the range of jobs and help care for the very large volume of elderly. This again will increase traffic volumes tremendously again and shatter those plans.</p> <p>Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.</p> <p>Within the plan for 500 homes here, with car ownership at approximately two per household as an average there will be a large portion of these will use the B1436 adding up to over 350,000 movements yearly.</p> <p>We have not even begun to address the increase in traffic due to tourists, who are so vital to the economy, so we are told by NNDC. If they cannot get here we are destined to have this total mess to ourselves, what a lovely prospect for us all.</p> <p>That would be the biggest abject failure of all by NNDC!!</p>
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Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS563
Response Date	25/02/2022 12:00:00
Name	Mr Neil Faulkes
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	

* Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>The plan in general has a lot of excellent thoughts, ideas and projections But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.</p> <p>This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became a one-way system, this small, narrow country road has become an A road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.</p> <p>We are faced with a low-level B road taking A road streams, which the County Highways Division acknowledges that it is not safe, but there is nowhere else for the traffic to go. The land that was earmarked for a potential By Pass in previous plans has now been built on so that option is no longer there for future road infrastructure improvements.</p> <p>The fact is that the simplest and easiest decision is to base a large development on one side of the town which would signify the loss of the village of Roughton which would be swallowed and absorbed into Cromer. Yet Roughton is a village, and a development placed in the area chosen is West of Pine Tree Farm is situated in between parish boundaries Northrepps and Roughton, yet the area is labelled as Cromer. This is a false heading and misinformation and therefore makes this plan misleading and wrong, which therefore presents a false plan to the local electorate and population.</p> <p>Added to this is the fact that the barriers and space between Cromer and Roughton would simply disappear and Roughton would become a suburb of Cromer and remain in name only. The submission of local and neighbourhood plans along with the stated core strategy of NNDC to protect our local heritage and villages would be dismissed at a stroke, and make the entire operation of the core strategy a joke operation to be easily dismissed and overridden for the sake of convenience and ease of producing this plan.</p> <p>So where does the proposal to put 500 houses on the land west of the Norwich Road without any proper access except via a track road called Carr Lane, which comes out to a less than substantial road of Roughton Road and Mill Lane with no street lighting, drainage, with secluded house entry, hedges, coupled with insufficient vision.</p> <p>The improvements required from Norwich Road with a roundabout and a footbridge over that junction or beside it is a most damaging and frightening prospect which is not protecting our heritage. It will become an urban town destroying the countryside at a stroke, which NNDC have used to refuse planning and development decisions for building a single house in which is supposed to be countryside, which is illegal under planning laws.</p> <p>It will adversely affect Northrepps, Roughton, Southrepps, Felbrigg, Cromer, West & East Beckham, Gresham, Hanworth, Aldborough, West & East Runton.</p> <p>All this is stipulated here, before we even look at the traffic flow along and entry and exit into the B1436 at either end.</p> <p>Where this plans sits if implemented it will lead to significant and a deadly increase in traffic on B1436 and Metton / Hall road. This just simply cannot happen as it cannot be used as an A road but treated as a very poorly laid out B road.</p> <p>We have no pavements for school children, no policing for speed, roads barely wide enough for two lorries, and a significant increase in farm traffic with contract farming. Lack of funding for hedge/verge cutting to make the roads safer.</p>

	<p>We already know that the B1436 cannot ever be closed after admissions by the Director of Highways and the local Highways Spokesperson. This was admitted to the Police at a recent public meeting. The roads here can not take any more volume at all but due to this plan they will have to without an infrastructural plan. This brings us back to the basic reason of this plan being unsound. At a recent meeting the director of highways stated that there was no plans to improve the B1436 in the foreseeable future. There is no budget as stipulated and agreed by the local highways spokesman and that the situation is only going to get worse.</p> <p>Residents are no longer able to walk from their properties. The only way to get anywhere is by car increasing traffic, emissions, volume and intensity.</p> <p>There is also the proposed development for 30 homes down Back Lane which will ensure that cars will come to the Metton Road Junction as access to Norwich Road there with a steep uphill gradient and a right turn does not bear thinking about during rush hours at least.</p> <p>Lack of infrastructure in roads to support the development continually brings the B1436 into very sharp focus and we all know that North Norfolk as a whole has very poor roads with virtually no funding being put to our roads for safety or maintenance or traffic flow improvements. Emergency services can not easily get through as no pulling in places. The number of extra people will place even more pressure on already over stretched services. Should development be permitted to go ahead the infrastructure must be in place on the Norwich road before any work on building site takes place, and clearly this plan demonstrates nothing but a few lines of pointed dismissal. Traffic using Carr Lane would need to be addressed as this road is not suitable in any way to carry cut through traffic.</p> <p>The estate will need to have more affordable housing to encourage and help young people to be able to stay in their homes towns thus helping to serve the range of jobs and help care for the very large volume of elderly. This again will increase traffic volumes tremendously again and shatter those plans.</p> <p>Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.</p> <p>Within the plan for 500 homes here, with car ownership at approximately two per household as an average there will be a large portion of these will use the B1436 adding up to over 350,000 movements yearly.</p> <p>We have not even begun to address the increase in traffic due to tourists, who are so vital to the economy, so we are told by NNDC. If they cannot get here we are destined to have this total mess to ourselves, what a lovely prospect for us all.</p> <p>That would be the biggest abject failure of all by NNDC!!</p>
Modifications requested	Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS565
Response Date	25/02/2022 12:00:00
Name	Ms Shirley Day
Organisation	
Agent Name	

Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>The plan in general has a lot of excellent thoughts, ideas and projections But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.</p> <p>This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became a one-way system, this small, narrow country road has become an A road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.</p> <p>We are faced with a low-level B road taking A road streams, which the County Highways Division acknowledges that it is not safe, but there is nowhere else for the traffic to go. The land that was earmarked for a potential By Pass in previous plans has now been built on so that option is no longer there for future road infrastructure improvements.</p> <p>The fact is that the simplest and easiest decision is to base a large development on one side of the town which would signify the loss of the village of Roughton which would be swallowed and absorbed into Cromer. Yet Roughton is a village, and a development placed in the area chosen is West of Pine Tree Farm is situated in between parish boundaries Northrepps and Roughton, yet the area is labelled as Cromer. This is a false heading and misinformation and therefore makes this plan misleading and wrong, which therefore presents a false plan to the local electorate and population.</p> <p>Added to this is the fact that the barriers and space between Cromer and Roughton would simply disappear and Roughton would become a suburb of Cromer and remain in name only. The submission of local and neighbourhood plans along with the stated core strategy of NNDC to protect our local heritage and villages would be dismissed at a stroke, and make the entire operation of the core strategy a joke operation to be easily dismissed and overridden for the sake of convenience and ease of producing this plan.</p> <p>So where does the proposal to put 500 houses on the land west of the Norwich Road without any proper access except via a track road called Carr Lane, which comes out to a less than substantial road of Roughton Road and Mill Lane with no street lighting, drainage, with secluded house entry, hedges, coupled with insufficient vision.</p> <p>The improvements required from Norwich Road with a roundabout and a footbridge over that junction or beside it is a most damaging and frightening prospect which is not protecting our heritage. It will become an urban town destroying the countryside at a stroke, which NNDC have used to refuse planning and development decisions for building a single house in which is supposed to be countryside, which is illegal under planning laws.</p> <p>It will adversely affect Northrepps, Roughton, Southrepps, Felbrigg, Cromer, West & East Beckham, Gresham, Hanworth, Aldborough, West & East Runton.</p> <p>All this is stipulated here, before we even look at the traffic flow along and entry and exit into the B1436 at either end.</p> <p>Where this plans sits if implemented it will lead to significant and a deadly increase in traffic on B1436 and Metton / Hall road. This just simply cannot happen as it cannot be used as an A road but treated as a very poorly laid out B road.</p> <p>We have no pavements for school children, no policing for speed, roads barely wide enough for two lorries, and a significant increase in</p>

	<p>farm traffic with contract farming. Lack of funding for hedge/verge cutting to make the roads safer.</p> <p>We already know that the B1436 cannot ever be closed after admissions by the Director of Highways and the local Highways Spokesperson. This was admitted to the Police at a recent public meeting. The roads here can not take any more volume at all but due to this plan they will have to without an infrastructural plan. This brings us back to the basic reason of this plan being unsound. At a recent meeting the director of highways stated that there was no plans to improve the B1436 in the foreseeable future. There is no budget as stipulated and agreed by the local highways spokesman and that the situation is only going to get worse.</p> <p>Residents are no longer able to walk from their properties. The only way to get anywhere is by car increasing traffic, emissions, volume and intensity.</p> <p>There is also the proposed development for 30 homes down Back Lane which will ensure that cars will come to the Metton Road Junction as access to Norwich Road there with a steep uphill gradient and a right turn does not bear thinking about during rush hours at least.</p> <p>Lack of infrastructure in roads to support the development continually brings the B1436 into very sharp focus and we all know that North Norfolk as a whole has very poor roads with virtually no funding being put to our roads for safety or maintenance or traffic flow improvements. Emergency services can not easily get through as no pulling in places. The number of extra people will place even more pressure on already over stretched services. Should development be permitted to go ahead the infrastructure must be in place on the Norwich road before any work on building site takes place, and clearly this plan demonstrates nothing but a few lines of pointed dismissal. Traffic using Carr Lane would need to be addressed as this road is not suitable in any way to carry cut through traffic.</p> <p>The estate will need to have more affordable housing to encourage and help young people to be able to stay in their homes towns thus helping to serve the range of jobs and help care for the very large volume of elderly. This again will increase traffic volumes tremendously again and shatter those plans.</p> <p>Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.</p> <p>Within the plan for 500 homes here, with car ownership at approximately two per household as an average there will be a large portion of these will use the B1436 adding up to over 350,000 movements yearly.</p> <p>We have not even begun to address the increase in traffic due to tourists, who are so vital to the economy, so we are told by NNDC. If they cannot get here we are destined to have this total mess to ourselves, what a lovely prospect for us all.</p> <p>That would be the biggest abject failure of all by NNDC!!</p>
Modifications requested	Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS567
Response Date	25/02/2022 12:00:00
Name	Ms Sarah Thornley

Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>The plan in general has a lot of excellent thoughts, ideas and projections But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.</p> <p>This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became a one-way system, this small, narrow country road has become an A road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.</p> <p>We are faced with a low-level B road taking A road streams, which the County Highways Division acknowledges that it is not safe, but there is nowhere else for the traffic to go. The land that was earmarked for a potential By Pass in previous plans has now been built on so that option is no longer there for future road infrastructure improvements.</p> <p>The fact is that the simplest and easiest decision is to base a large development on one side of the town which would signify the loss of the village of Roughton which would be swallowed and absorbed into Cromer. Yet Roughton is a village, and a development placed in the area chosen is West of Pine Tree Farm is situated in between parish boundaries Northrepps and Roughton, yet the area is labelled as Cromer. This is a false heading and misinformation and therefore makes this plan misleading and wrong, which therefore presents a false plan to the local electorate and population.</p> <p>Added to this is the fact that the barriers and space between Cromer and Roughton would simply disappear and Roughton would become a suburb of Cromer and remain in name only. The submission of local and neighbourhood plans along with the stated core strategy of NNDC to protect our local heritage and villages would be dismissed at a stroke, and make the entire operation of the core strategy a joke operation to be easily dismissed and overridden for the sake of convenience and ease of producing this plan.</p> <p>So where does the proposal to put 500 houses on the land west of the Norwich Road without any proper access except via a track road called Carr Lane, which comes out to a less than substantial road of Roughton Road and Mill Lane with no street lighting, drainage, with secluded house entry, hedges, coupled with insufficient vision.</p> <p>The improvements required from Norwich Road with a roundabout and a footbridge over that junction or beside it is a most damaging and frightening prospect which is not protecting our heritage. It will become an urban town destroying the countryside at a stroke, which NNDC have used to refuse planning and development decisions for building a single house in which is supposed to be countryside, which is illegal under planning laws.</p> <p>It will adversely affect Northrepps, Roughton, Southrepps, Felbrigg, Cromer, West & East Beckham, Gresham, Hanworth, Aldborough, West & East Runton.</p> <p>All this is stipulated here, before we even look at the traffic flow along and entry and exit into the B1436 at either end.</p> <p>Where this plans sits if implemented it will lead to significant and a deadly increase in traffic on B1436 and Metton / Hall road. This just</p>

	<p>simply cannot happen as it cannot be used as an A road but treated as a very poorly laid out B road.</p> <p>We have no pavements for school children, no policing for speed, roads barely wide enough for two lorries, and a significant increase in farm traffic with contract farming. Lack of funding for hedge/verge cutting to make the roads safer.</p> <p>We already know that the B1436 cannot ever be closed after admissions by the Director of Highways and the local Highways Spokesperson. This was admitted to the Police at a recent public meeting. The roads here can not take any more volume at all but due to this plan they will have to without an infrastructural plan. This brings us back to the basic reason of this plan being unsound. At a recent meeting the director of highways stated that there was no plans to improve the B1436 in the foreseeable future. There is no budget as stipulated and agreed by the local highways spokesman and that the situation is only going to get worse.</p> <p>Residents are no longer able to walk from their properties. The only way to get anywhere is by car increasing traffic, emissions, volume and intensity.</p> <p>There is also the proposed development for 30 homes down Back Lane which will ensure that cars will come to the Metton Road Junction as access to Norwich Road there with a steep uphill gradient and a right turn does not bear thinking about during rush hours at least.</p> <p>Lack of infrastructure in roads to support the development continually brings the B1436 into very sharp focus and we all know that North Norfolk as a whole has very poor roads with virtually no funding being put to our roads for safety or maintenance or traffic flow improvements. Emergency services can not easily get through as no pulling in places. The number of extra people will place even more pressure on already over stretched services. Should development be permitted to go ahead the infrastructure must be in place on the Norwich road before any work on building site takes place, and clearly this plan demonstrates nothing but a few lines of pointed dismissal. Traffic using Carr Lane would need to be addressed as this road is not suitable in any way to carry cut through traffic.</p> <p>The estate will need to have more affordable housing to encourage and help young people to be able to stay in their homes towns thus helping to serve the range of jobs and help care for the very large volume of elderly. This again will increase traffic volumes tremendously again and shatter those plans.</p> <p>Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.</p> <p>Within the plan for 500 homes here, with car ownership at approximately two per household as an average there will be a large portion of these will use the B1436 adding up to over 350,000 movements yearly.</p> <p>We have not even begun to address the increase in traffic due to tourists, who are so vital to the economy, so we are told by NNDC. If they cannot get here we are destined to have this total mess to ourselves, what a lovely prospect for us all.</p> <p>That would be the biggest abject failure of all by NNDC!!</p>
Modifications requested	Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS569
Response Date	25/02/2022 12:00:00

Name	Ms Wendy Morgan
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>The plan in general has a lot of excellent thoughts, ideas and projections But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.</p> <p>This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became a one-way system, this small, narrow country road has become an A road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.</p> <p>We are faced with a low-level B road taking A road streams, which the County Highways Division acknowledges that it is not safe, but there is nowhere else for the traffic to go. The land that was earmarked for a potential By Pass in previous plans has now been built on so that option is no longer there for future road infrastructure improvements.</p> <p>The fact is that the simplest and easiest decision is to base a large development on one side of the town which would signify the loss of the village of Roughton which would be swallowed and absorbed into Cromer. Yet Roughton is a village, and a development placed in the area chosen is West of Pine Tree Farm is situated in between parish boundaries Northrepps and Roughton, yet the area is labelled as Cromer. This is a false heading and misinformation and therefore makes this plan misleading and wrong, which therefore presents a false plan to the local electorate and population.</p> <p>Added to this is the fact that the barriers and space between Cromer and Roughton would simply disappear and Roughton would become a suburb of Cromer and remain in name only. The submission of local and neighbourhood plans along with the stated core strategy of NNDC to protect our local heritage and villages would be dismissed at a stroke, and make the entire operation of the core strategy a joke operation to be easily dismissed and overridden for the sake of convenience and ease of producing this plan.</p> <p>So where does the proposal to put 500 houses on the land west of the Norwich Road without any proper access except via a track road called Carr Lane, which comes out to a less than substantial road of Roughton Road and Mill Lane with no street lighting, drainage, with secluded house entry, hedges, coupled with insufficient vision.</p> <p>The improvements required from Norwich Road with a roundabout and a footbridge over that junction or beside it is a most damaging and frightening prospect which is not protecting our heritage. It will become an urban town destroying the countryside at a stroke, which NNDC have used to refuse planning and development decisions for building a single house in which is supposed to be countryside, which is illegal under planning laws.</p> <p>It will adversely affect Northrepps, Roughton, Southrepps, Felbrigg, Cromer, West & East Beckham, Gresham, Hanworth, Aldborough, West & East Runton.</p> <p>All this is stipulated here, before we even look at the traffic flow along and entry and exit into the B1436 at either end.</p>

	<p>Where this plans sits if implemented it will lead to significant and a deadly increase in traffic on B1436 and Metton / Hall road. This just simply cannot happen as it cannot be used as an A road but treated as a very poorly laid out B road.</p> <p>We have no pavements for school children, no policing for speed, roads barely wide enough for two lorries, and a significant increase in farm traffic with contract farming. Lack of funding for hedge/verge cutting to make the roads safer.</p> <p>We already know that the B1436 cannot ever be closed after admissions by the Director of Highways and the local Highways Spokesperson. This was admitted to the Police at a recent public meeting. The roads here can not take any more volume at all but due to this plan they will have to without an infrastructural plan. This brings us back to the basic reason of this plan being unsound. At a recent meeting the director of highways stated that there was no plans to improve the B1436 in the foreseeable future. There is no budget as stipulated and agreed by the local highways spokesman and that the situation is only going to get worse.</p> <p>Residents are no longer able to walk from their properties. The only way to get anywhere is by car increasing traffic, emissions, volume and intensity.</p> <p>There is also the proposed development for 30 homes down Back Lane which will ensure that cars will come to the Metton Road Junction as access to Norwich Road there with a steep uphill gradient and a right turn does not bear thinking about during rush hours at least.</p> <p>Lack of infrastructure in roads to support the development continually brings the B1436 into very sharp focus and we all know that North Norfolk as a whole has very poor roads with virtually no funding being put to our roads for safety or maintenance or traffic flow improvements. Emergency services can not easily get through as no pulling in places. The number of extra people will place even more pressure on already over stretched services. Should development be permitted to go ahead the infrastructure must be in place on the Norwich road before any work on building site takes place, and clearly this plan demonstrates nothing but a few lines of pointed dismissal. Traffic using Carr Lane would need to be addressed as this road is not suitable in any way to carry cut through traffic.</p> <p>The estate will need to have more affordable housing to encourage and help young people to be able to stay in their homes towns thus helping to serve the range of jobs and help care for the very large volume of elderly. This again will increase traffic volumes tremendously again and shatter those plans.</p> <p>Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.</p> <p>Within the plan for 500 homes here, with car ownership at approximately two per household as an average there will be a large portion of these will use the B1436 adding up to over 350,000 movements yearly.</p> <p>We have not even begun to address the increase in traffic due to tourists, who are so vital to the economy, so we are told by NNDC. If they cannot get here we are destined to have this total mess to ourselves, what a lovely prospect for us all.</p> <p>That would be the biggest abject failure of all by NNDC!!</p>
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Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS571

Response Date	28/02/2022 12:00:00
Name	Mr Joe Arnold
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>The plan in general has a lot of excellent thoughts, ideas and projections But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.</p> <p>This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became a one-way system, this small, narrow country road has become an A road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.</p> <p>We are faced with a low-level B road taking A road streams, which the County Highways Division acknowledges that it is not safe, but there is nowhere else for the traffic to go. The land that was earmarked for a potential By Pass in previous plans has now been built on so that option is no longer there for future road infrastructure improvements.</p> <p>The fact is that the simplest and easiest decision is to base a large development on one side of the town which would signify the loss of the village of Roughton which would be swallowed and absorbed into Cromer. Yet Roughton is a village, and a development placed in the area chosen is West of Pine Tree Farm is situated in between parish boundaries Northrepps and Roughton, yet the area is labelled as Cromer. This is a false heading and misinformation and therefore makes this plan misleading and wrong, which therefore presents a false plan to the local electorate and population.</p> <p>Added to this is the fact that the barriers and space between Cromer and Roughton would simply disappear and Roughton would become a suburb of Cromer and remain in name only. The submission of local and neighbourhood plans along with the stated core strategy of NNDC to protect our local heritage and villages would be dismissed at a stroke, and make the entire operation of the core strategy a joke operation to be easily dismissed and overridden for the sake of convenience and ease of producing this plan.</p> <p>So where does the proposal to put 500 houses on the land west of the Norwich Road without any proper access except via a track road called Carr Lane, which comes out to a less than substantial road of Roughton Road and Mill Lane with no street lighting, drainage, with secluded house entry, hedges, coupled with insufficient vision.</p> <p>The improvements required from Norwich Road with a roundabout and a footbridge over that junction or beside it is a most damaging and frightening prospect which is not protecting our heritage. It will become an urban town destroying the countryside at a stroke, which NNDC have used to refuse planning and development decisions for building a single house in which is supposed to be countryside, which is illegal under planning laws.</p> <p>It will adversely affect Northrepps, Roughton, Southrepps, Felbrigg, Cromer, West & East Beckham, Gresham, Hanworth, Aldborough, West & East Runton.</p>

All this is stipulated here, before we even look at the traffic flow along and entry and exit into the B1436 at either end.

Where this plans sits if implemented it will lead to significant and a deadly increase in traffic on B1436 and Metton / Hall road. This just simply cannot happen as it cannot be used as an A road but treated as a very poorly laid out B road.

We have no pavements for school children, no policing for speed, roads barely wide enough for two lorries, and a significant increase in farm traffic with contract farming. Lack of funding for hedge/verge cutting to make the roads safer.

We already know that the B1436 cannot ever be closed after admissions by the Director of Highways and the local Highways Spokesperson. This was admitted to the Police at a recent public meeting. The roads here can not take any more volume at all but due to this plan they will have to without an infrastructural plan. This brings us back to the basic reason of this plan being unsound. At a recent meeting the director of highways stated that there was no plans to improve the B1436 in the foreseeable future. There is no budget as stipulated and agreed by the local highways spokesman and that the situation is only going to get worse.

Residents are no longer able to walk from their properties. The only way to get anywhere is by car increasing traffic, emissions, volume and intensity.

There is also the proposed development for 30 homes down Back Lane which will ensure that cars will come to the Metton Road Junction as access to Norwich Road there with a steep uphill gradient and a right turn does not bear thinking about during rush hours at least.

Lack of infrastructure in roads to support the development continually brings the B1436 into very sharp focus and we all know that North Norfolk as a whole has very poor roads with virtually no funding being put to our roads for safety or maintenance or traffic flow improvements. Emergency services can not easily get through as no pulling in places. The number of extra people will place even more pressure on already over stretched services. Should development be permitted to go ahead the infrastructure must be in place on the Norwich road before any work on building site takes place, and clearly this plan demonstrates nothing but a few lines of pointed dismissal. Traffic using Carr Lane would need to be addressed as this road is not suitable in any way to carry cut through traffic.

The estate will need to have more affordable housing to encourage and help young people to be able to stay in their homes towns thus helping to serve the range of jobs and help care for the very large volume of elderly. This again will increase traffic volumes tremendously again and shatter those plans.

Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.

Within the plan for 500 homes here, with car ownership at approximately two per household as an average there will be a large portion of these will use the B1436 adding up to over 350,000 movements yearly.

We have not even begun to address the increase in traffic due to tourists, who are so vital to the economy, so we are told by NNDC. If they cannot get here we are destined to have this total mess to ourselves, what a lovely prospect for us all.

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Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2

Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS573
Response Date	28/02/2022 12:00:00
Name	Karen Paice & Fiona Lilley
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>The plan in general has a lot of excellent thoughts, ideas and projections But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.</p> <p>This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became a one-way system, this small, narrow country road has become an A road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.</p> <p>We are faced with a low-level B road taking A road streams, which the County Highways Division acknowledges that it is not safe, but there is nowhere else for the traffic to go. The land that was earmarked for a potential By Pass in previous plans has now been built on so that option is no longer there for future road infrastructure improvements.</p> <p>The fact is that the simplest and easiest decision is to base a large development on one side of the town which would signify the loss of the village of Roughton which would be swallowed and absorbed into Cromer. Yet Roughton is a village, and a development placed in the area chosen is West of Pine Tree Farm is situated in between parish boundaries Northrepps and Roughton, yet the area is labelled as Cromer. This is a false heading and misinformation and therefore makes this plan misleading and wrong, which therefore presents a false plan to the local electorate and population.</p> <p>Added to this is the fact that the barriers and space between Cromer and Roughton would simply disappear and Roughton would become a suburb of Cromer and remain in name only. The submission of local and neighbourhood plans along with the stated core strategy of NNDC to protect our local heritage and villages would be dismissed at a stroke, and make the entire operation of the core strategy a joke operation to be easily dismissed and overridden for the sake of convenience and ease of producing this plan.</p> <p>So where does the proposal to put 500 houses on the land west of the Norwich Road without any proper access except via a track road called Carr Lane, which comes out to a less than substantial road of Roughton Road and Mill Lane with no street lighting, drainage, with secluded house entry, hedges, coupled with insufficient vision.</p> <p>The improvements required from Norwich Road with a roundabout and a footbridge over that junction or beside it is a most damaging and frightening prospect which is not protecting our heritage. It will become an urban town destroying the countryside at a stroke, which NNDC have used to refuse planning and development decisions for building a single house in which is supposed to be countryside, which is illegal under planning laws.</p>

It will adversely affect Northrepps, Roughton, Southrepps, Felbrigg, Cromer, West & East Beckham, Gresham, Hanworth, Aldborough, West & East Runton.

All this is stipulated here, before we even look at the traffic flow along and entry and exit into the B1436 at either end.

Where this plans sits if implemented it will lead to significant and a deadly increase in traffic on B1436 and Metton / Hall road. This just simply cannot happen as it cannot be used as an A road but treated as a very poorly laid out B road.

We have no pavements for school children, no policing for speed, roads barely wide enough for two lorries, and a significant increase in farm traffic with contract farming. Lack of funding for hedge/verge cutting to make the roads safer.

We already know that the B1436 cannot ever be closed after admissions by the Director of Highways and the local Highways Spokesperson. This was admitted to the Police at a recent public meeting. The roads here can not take any more volume at all but due to this plan they will have to without an infrastructural plan. This brings us back to the basic reason of this plan being unsound. At a recent meeting the director of highways stated that there was no plans to improve the B1436 in the foreseeable future. There is no budget as stipulated and agreed by the local highways spokesman and that the situation is only going to get worse.

Residents are no longer able to walk from their properties. The only way to get anywhere is by car increasing traffic, emissions, volume and intensity.

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Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS575
Response Date	01/03/2022 12:00:00
Name	Christopher & D Price
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>The plan in general has a lot of excellent thoughts, ideas and projections But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.</p> <p>This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became a one-way system, this small, narrow country road has become an A road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.</p> <p>We are faced with a low-level B road taking A road streams, which the County Highways Division acknowledges that it is not safe, but there is nowhere else for the traffic to go. The land that was earmarked for a potential By Pass in previous plans has now been built on so that option is no longer there for future road infrastructure improvements.</p> <p>The fact is that the simplest and easiest decision is to base a large development on one side of the town which would signify the loss of the village of Roughton which would be swallowed and absorbed into Cromer. Yet Roughton is a village, and a development placed in the area chosen is West of Pine Tree Farm is situated in between parish boundaries Northrepps and Roughton, yet the area is labelled as Cromer. This is a false heading and misinformation and therefore makes this plan misleading and wrong, which therefore presents a false plan to the local electorate and population.</p> <p>Added to this is the fact that the barriers and space between Cromer and Roughton would simply disappear and Roughton would become a suburb of Cromer and remain in name only. The submission of local and neighbourhood plans along with the stated core strategy of NNDC to protect our local heritage and villages would be dismissed at a stroke, and make the entire operation of the core strategy a joke operation to be easily dismissed and overridden for the sake of convenience and ease of producing this plan.</p> <p>So where does the proposal to put 500 houses on the land west of the Norwich Road without any proper access except via a track road called Carr Lane, which comes out to a less than substantial road of Roughton Road and Mill Lane with no street lighting, drainage, with secluded house entry, hedges, coupled with insufficient vision.</p> <p>The improvements required from Norwich Road with a roundabout and a footbridge over that junction or beside it is a most damaging and frightening prospect which is not protecting our heritage. It will become an urban town destroying the countryside at a stroke, which NNDC have used to refuse planning and development decisions for</p>

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Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	

Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS577
Response Date	01/03/2022 12:00:00
Name	Christopher & Irmgard Sullivan
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>The plan in general has a lot of excellent thoughts, ideas and projections But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.</p> <p>This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became a one-way system, this small, narrow country road has become an A road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.</p> <p>We are faced with a low-level B road taking A road streams, which the County Highways Division acknowledges that it is not safe, but there is nowhere else for the traffic to go. The land that was earmarked for a potential By Pass in previous plans has now been built on so that option is no longer there for future road infrastructure improvements.</p> <p>The fact is that the simplest and easiest decision is to base a large development on one side of the town which would signify the loss of the village of Roughton which would be swallowed and absorbed into Cromer. Yet Roughton is a village, and a development placed in the area chosen is West of Pine Tree Farm is situated in between parish boundaries Northrepps and Roughton, yet the area is labelled as Cromer. This is a false heading and misinformation and therefore makes this plan misleading and wrong, which therefore presents a false plan to the local electorate and population.</p> <p>Added to this is the fact that the barriers and space between Cromer and Roughton would simply disappear and Roughton would become a suburb of Cromer and remain in name only. The submission of local and neighbourhood plans along with the stated core strategy of NNDC to protect our local heritage and villages would be dismissed at a stroke, and make the entire operation of the core strategy a joke operation to be easily dismissed and overridden for the sake of convenience and ease of producing this plan.</p> <p>So where does the proposal to put 500 houses on the land west of the Norwich Road without any proper access except via a track road called Carr Lane, which comes out to a less than substantial road of Roughton Road and Mill Lane with no street lighting, drainage, with secluded house entry, hedges, coupled with insufficient vision.</p> <p>The improvements required from Norwich Road with a roundabout and a footbridge over that junction or beside it is a most damaging and frightening prospect which is not protecting our heritage. It will become an urban town destroying the countryside at a stroke, which</p>

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<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>

Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS579
Response Date	01/03/2022 12:00:00
Name	Mr Ian Jackson
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>The plan in general has a lot of excellent thoughts, ideas and projections But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.</p> <p>This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became a one-way system, this small, narrow country road has become an A road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.</p> <p>We are faced with a low-level B road taking A road streams, which the County Highways Division acknowledges that it is not safe, but there is nowhere else for the traffic to go. The land that was earmarked for a potential By Pass in previous plans has now been built on so that option is no longer there for future road infrastructure improvements.</p> <p>The fact is that the simplest and easiest decision is to base a large development on one side of the town which would signify the loss of the village of Roughton which would be swallowed and absorbed into Cromer. Yet Roughton is a village, and a development placed in the area chosen is West of Pine Tree Farm is situated in between parish boundaries Northrepps and Roughton, yet the area is labelled as Cromer. This is a false heading and misinformation and therefore makes this plan misleading and wrong, which therefore presents a false plan to the local electorate and population.</p> <p>Added to this is the fact that the barriers and space between Cromer and Roughton would simply disappear and Roughton would become a suburb of Cromer and remain in name only. The submission of local and neighbourhood plans along with the stated core strategy of NNDC to protect our local heritage and villages would be dismissed at a stroke, and make the entire operation of the core strategy a joke operation to be easily dismissed and overridden for the sake of convenience and ease of producing this plan.</p> <p>So where does the proposal to put 500 houses on the land west of the Norwich Road without any proper access except via a track road called Carr Lane, which comes out to a less than substantial road of Roughton Road and Mill Lane with no street lighting, drainage, with secluded house entry, hedges, coupled with insufficient vision.</p>

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Appear at examination hearing session(s)?	

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Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS581
Response Date	01/03/2022 12:00:00
Name	Mr & Mrs J Khalil
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	
* Yes	
* No	
Has the duty to cooperate been met?	
* Yes	
* No	
Do you consider the plan to be Sound?	No
* Yes	
* No	
Reason(s) not Sound	
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	<p>The plan in general has a lot of excellent thoughts, ideas and projections But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.</p> <p>This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became a one-way system, this small, narrow country road has become an A road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.</p> <p>We are faced with a low-level B road taking A road streams, which the County Highways Division acknowledges that it is not safe, but there is nowhere else for the traffic to go. The land that was earmarked for a potential By Pass in previous plans has now been built on so that option is no longer there for future road infrastructure improvements.</p> <p>The fact is that the simplest and easiest decision is to base a large development on one side of the town which would signify the loss of the village of Roughton which would be swallowed and absorbed into Cromer. Yet Roughton is a village, and a development placed in the area chosen is West of Pine Tree Farm is situated in between parish boundaries Northrepps and Roughton, yet the area is labelled as Cromer. This is a false heading and misinformation and therefore makes this plan misleading and wrong, which therefore presents a false plan to the local electorate and population.</p> <p>Added to this is the fact that the barriers and space between Cromer and Roughton would simply disappear and Roughton would become a suburb of Cromer and remain in name only. The submission of local and neighbourhood plans along with the stated core strategy of NNDC to protect our local heritage and villages would be dismissed at a stroke, and make the entire operation of the core strategy a joke operation to be easily dismissed and overridden for the sake of convenience and ease of producing this plan.</p> <p>So where does the proposal to put 500 houses on the land west of the Norwich Road without any proper access except via a track road called Carr Lane, which comes out to a less than substantial road of</p>

Roughton Road and Mill Lane with no street lighting, drainage, with secluded house entry, hedges, coupled with insufficient vision.

The improvements required from Norwich Road with a roundabout and a footbridge over that junction or beside it is a most damaging and frightening prospect which is not protecting our heritage. It will become an urban town destroying the countryside at a stroke, which NNDC have used to refuse planning and development decisions for building a single house in which is supposed to be countryside, which is illegal under planning laws.

It will adversely affect Northrepps, Roughton, Southrepps, Felbrigg, Cromer, West & East Beckham, Gresham, Hanworth, Aldborough, West & East Runton.

All this is stipulated here, before we even look at the traffic flow along and entry and exit into the B1436 at either end.

Where this plans sits if implemented it will lead to significant and a deadly increase in traffic on B1436 and Metton / Hall road. This just simply cannot happen as it cannot be used as an A road but treated as a very poorly laid out B road.

We have no pavements for school children, no policing for speed, roads barely wide enough for two lorries, and a significant increase in farm traffic with contract farming. Lack of funding for hedge/verge cutting to make the roads safer.

We already know that the B1436 cannot ever be closed after admissions by the Director of Highways and the local Highways Spokesperson. This was admitted to the Police at a recent public meeting. The roads here can not take any more volume at all but due to this plan they will have to without an infrastructural plan. This brings us back to the basic reason of this plan being unsound. At a recent meeting the director of highways stated that there was no plans to improve the B1436 in the foreseeable future. There is no budget as stipulated and agreed by the local highways spokesman and that the situation is only going to get worse.

Residents are no longer able to walk from their properties. The only way to get anywhere is by car increasing traffic, emissions, volume and intensity.

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Lack of infrastructure in roads to support the development continually brings the B1436 into very sharp focus and we all know that North Norfolk as a whole has very poor roads with virtually no funding being put to our roads for safety or maintenance or traffic flow improvements. Emergency services can not easily get through as no pulling in places. The number of extra people will place even more pressure on already over stretched services. Should development be permitted to go ahead the infrastructure must be in place on the Norwich road before any work on building site takes place, and clearly this plan demonstrates nothing but a few lines of pointed dismissal. Traffic using Carr Lane would need to be addressed as this road is not suitable in any way to carry cut through traffic.

The estate will need to have more affordable housing to encourage and help young people to be able to stay in their homes towns thus helping to serve the range of jobs and help care for the very large volume of elderly. This again will increase traffic volumes tremendously again and shatter those plans.

Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.

Within the plan for 500 homes here, with car ownership at approximately two per household as an average there will be a large portion of these will use the B1436 adding up to over 350,000 movements yearly.

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Modifications requested

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Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS583
Response Date	01/03/2022 12:00:00
Name	Ms Tracey Khalil
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>The plan in general has a lot of excellent thoughts, ideas and projections But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.</p> <p>This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became a one-way system, this small, narrow country road has become an A road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.</p> <p>We are faced with a low-level B road taking A road streams, which the County Highways Division acknowledges that it is not safe, but there is nowhere else for the traffic to go. The land that was earmarked for a potential By Pass in previous plans has now been built on so that option is no longer there for future road infrastructure improvements.</p> <p>The fact is that the simplest and easiest decision is to base a large development on one side of the town which would signify the loss of the village of Roughton which would be swallowed and absorbed into Cromer. Yet Roughton is a village, and a development placed in the area chosen is West of Pine Tree Farm is situated in between parish boundaries Northrepps and Roughton, yet the area is labelled as Cromer. This is a false heading and misinformation and therefore makes this plan misleading and wrong, which therefore presents a false plan to the local electorate and population.</p> <p>Added to this is the fact that the barriers and space between Cromer and Roughton would simply disappear and Roughton would become a suburb of Cromer and remain in name only. The submission of local and neighbourhood plans along with the stated core strategy of NNDC to protect our local heritage and villages would be dismissed at a stroke, and make the entire operation of the core strategy a joke</p>

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Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS572
Response Date	28/02/2022 12:00:00
Name	Mr James Blair
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>The plan in general has a lot of excellent thoughts, ideas and projections But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.</p> <p>This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became a one-way system, this small, narrow country road has become an A road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.</p> <p>We are faced with a low-level B road taking A road streams, which the County Highways Division acknowledges that it is not safe, but there is nowhere else for the traffic to go. The land that was earmarked for a potential By Pass in previous plans has now been built on so that option is no longer there for future road infrastructure improvements.</p> <p>The fact is that the simplest and easiest decision is to base a large development on one side of the town which would signify the loss of the village of Roughton which would be swallowed and absorbed into Cromer. Yet Roughton is a village, and a development placed in the area chosen is West of Pine Tree Farm is situated in between parish boundaries Northrepps and Roughton, yet the area is labelled as Cromer. This is a false heading and misinformation and therefore makes this plan misleading and wrong, which therefore presents a false plan to the local electorate and population.</p> <p>Added to this is the fact that the barriers and space between Cromer and Roughton would simply disappear and Roughton would become a suburb of Cromer and remain in name only. The submission of local</p>

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Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS574
Response Date	28/02/2022 12:00:00
Name	Peter & Julia Pethybridge
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
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Explanation	<p>The plan in general has a lot of excellent thoughts, ideas and projections But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.</p> <p>This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became a one-way system, this small, narrow country road has become an A road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.</p> <p>We are faced with a low-level B road taking A road streams, which the County Highways Division acknowledges that it is not safe, but there is nowhere else for the traffic to go. The land that was earmarked for a potential By Pass in previous plans has now been built on so that option is no longer there for future road infrastructure improvements.</p> <p>The fact is that the simplest and easiest decision is to base a large development on one side of the town which would signify the loss of the village of Roughton which would be swallowed and absorbed into Cromer. Yet Roughton is a village, and a development placed in the area chosen is West of Pine Tree Farm is situated in between parish boundaries Northrepps and Roughton, yet the area is labelled as Cromer. This is a false heading and misinformation and therefore makes this plan misleading and wrong, which therefore presents a false plan to the local electorate and population.</p>

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Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS576
Response Date	01/04/2022 11:00:00
Name	Colin & Carol Roe
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
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	<p>Within the plan for 500 homes here, with car ownership at approximately two per household as an average there will be a large portion of these will use the B1436 adding up to over 350,000 movements yearly.</p> <p>We have not even begun to address the increase in traffic due to tourists, who are so vital to the economy, so we are told by NNDC. If they cannot get here we are destined to have this total mess to ourselves, what a lovely prospect for us all.</p> <p>That would be the biggest abject failure of all by NNDC!!</p>
Modifications requested	Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS578
Response Date	01/03/2022 12:00:00
Name	Ms Christine Taylor
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>The plan in general has a lot of excellent thoughts, ideas and projections But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.</p> <p>This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became a one-way system, this small, narrow country road has become an A road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.</p> <p>We are faced with a low-level B road taking A road streams, which the County Highways Division acknowledges that it is not safe, but there is nowhere else for the traffic to go. The land that was earmarked for a potential By Pass in previous plans has now been built on so that option is no longer there for future road infrastructure improvements.</p> <p>The fact is that the simplest and easiest decision is to base a large development on one side of the town which would signify the loss of the village of Roughton which would be swallowed and absorbed into Cromer. Yet Roughton is a village, and a development placed in the</p>

area chosen is West of Pine Tree Farm is situated in between parish boundaries Northrepps and Roughton, yet the area is labelled as Cromer. This is a false heading and misinformation and therefore makes this plan misleading and wrong, which therefore presents a false plan to the local electorate and population.

Added to this is the fact that the barriers and space between Cromer and Roughton would simply disappear and Roughton would become a suburb of Cromer and remain in name only. The submission of local and neighbourhood plans along with the stated core strategy of NNDC to protect our local heritage and villages would be dismissed at a stroke, and make the entire operation of the core strategy a joke operation to be easily dismissed and overridden for the sake of convenience and ease of producing this plan.

So where does the proposal to put 500 houses on the land west of the Norwich Road without any proper access except via a track road called Carr Lane, which comes out to a less than substantial road of Roughton Road and Mill Lane with no street lighting, drainage, with secluded house entry, hedges, coupled with insufficient vision.

The improvements required from Norwich Road with a roundabout and a footbridge over that junction or beside it is a most damaging and frightening prospect which is not protecting our heritage. It will become an urban town destroying the countryside at a stroke, which NNDC have used to refuse planning and development decisions for building a single house in which is supposed to be countryside, which is illegal under planning laws.

It will adversely affect Northrepps, Roughton, Southrepps, Felbrigg, Cromer, West & East Beckham, Gresham, Hanworth, Aldborough, West & East Runton.

All this is stipulated here, before we even look at the traffic flow along and entry and exit into the B1436 at either end.

Where this plans sits if implemented it will lead to significant and a deadly increase in traffic on B1436 and Metton / Hall road. This just simply cannot happen as it cannot be used as an A road but treated as a very poorly laid out B road.

We have no pavements for school children, no policing for speed, roads barely wide enough for two lorries, and a significant increase in farm traffic with contract farming. Lack of funding for hedge/verge cutting to make the roads safer.

We already know that the B1436 cannot ever be closed after admissions by the Director of Highways and the local Highways Spokesperson. This was admitted to the Police at a recent public meeting. The roads here can not take any more volume at all but due to this plan they will have to without an infrastructural plan. This brings us back to the basic reason of this plan being unsound. At a recent meeting the director of highways stated that there was no plans to improve the B1436 in the foreseeable future. There is no budget as stipulated and agreed by the local highways spokesman and that the situation is only going to get worse.

Residents are no longer able to walk from their properties. The only way to get anywhere is by car increasing traffic, emissions, volume and intensity.

There is also the proposed development for 30 homes down Back Lane which will ensure that cars will come to the Metton Road Junction as access to Norwich Road there with a steep uphill gradient and a right turn does not bear thinking about during rush hours at least.

Lack of infrastructure in roads to support the development continually brings the B1436 into very sharp focus and we all know that North Norfolk as a whole has very poor roads with virtually no funding being put to our roads for safety or maintenance or traffic flow improvements. Emergency services can not easily get through as no pulling in places. The number of extra people will place even more pressure on already over stretched services. Should development be permitted to go ahead the infrastructure must be in place on the Norwich road before any work on building site takes place, and clearly this plan demonstrates nothing but a few lines of pointed dismissal. Traffic using Carr Lane would need to be addressed as this road is not suitable in any way to carry cut through traffic.

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	<p>Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.</p> <p>Within the plan for 500 homes here, with car ownership at approximately two per household as an average there will be a large portion of these will use the B1436 adding up to over 350,000 movements yearly.</p> <p>We have not even begun to address the increase in traffic due to tourists, who are so vital to the economy, so we are told by NNDC. If they cannot get here we are destined to have this total mess to ourselves, what a lovely prospect for us all.</p> <p>That would be the biggest abject failure of all by NNDC!!</p>
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Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS580
Response Date	01/03/2022 12:00:00
Name	John & Claire Davies
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>The plan in general has a lot of excellent thoughts, ideas and projections But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.</p> <p>This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became a one-way system, this small, narrow country road has become an A road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.</p> <p>We are faced with a low-level B road taking A road streams, which the County Highways Division acknowledges that it is not safe, but there is nowhere else for the traffic to go. The land that was earmarked for a potential By Pass in previous plans has now been built on so that option is no longer there for future road infrastructure improvements.</p>

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We have no pavements for school children, no policing for speed, roads barely wide enough for two lorries, and a significant increase in farm traffic with contract farming. Lack of funding for hedge/verge cutting to make the roads safer.

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	<p>volume of elderly. This again will increase traffic volumes tremendously again and shatter those plans.</p> <p>Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.</p> <p>Within the plan for 500 homes here, with car ownership at approximately two per household as an average there will be a large portion of these will use the B1436 adding up to over 350,000 movements yearly.</p> <p>We have not even begun to address the increase in traffic due to tourists, who are so vital to the economy, so we are told by NNDC. If they cannot get here we are destined to have this total mess to ourselves, what a lovely prospect for us all.</p> <p>That would be the biggest abject failure of all by NNDC!!</p>
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Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS582
Response Date	01/03/2022 12:00:00
Name	Ms Laura Khalil
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>The plan in general has a lot of excellent thoughts, ideas and projections But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.</p> <p>This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became a one-way system, this small, narrow country road has become an A road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.</p> <p>We are faced with a low-level B road taking A road streams, which the County Highways Division acknowledges that it is not safe, but there is nowhere else for the traffic to go. The land that was earmarked</p>

for a potential By Pass in previous plans has now been built on so that option is no longer there for future road infrastructure improvements.

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Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS584
Response Date	01/03/2022 12:00:00
Name	K Pearson
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>The plan in general has a lot of excellent thoughts, ideas and projections But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.</p> <p>This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became a one-way system, this small, narrow country road has become an A road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.</p>

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Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS586
Response Date	01/03/2022 12:00:00
Name	Ms Yingqi Zhu
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
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We have no pavements for school children, no policing for speed, roads barely wide enough for two lorries, and a significant increase in farm traffic with contract farming. Lack of funding for hedge/verge cutting to make the roads safer.

We already know that the B1436 cannot ever be closed after admissions by the Director of Highways and the local Highways Spokesperson. This was admitted to the Police at a recent public meeting. The roads here can not take any more volume at all but due to this plan they will have to without an infrastructural plan. This brings us back to the basic reason of this plan being unsound. At a recent meeting the director of highways stated that there was no plans to improve the B1436 in the foreseeable future. There is no budget as stipulated and agreed by the local highways spokesman and that the situation is only going to get worse.

Residents are no longer able to walk from their properties. The only way to get anywhere is by car increasing traffic, emissions, volume and intensity.

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Lack of infrastructure in roads to support the development continually brings the B1436 into very sharp focus and we all know that North Norfolk as a whole has very poor roads with virtually no funding being put to our roads for safety or maintenance or traffic flow improvements. Emergency services can not easily get through as no pulling in places. The number of extra people will place even more pressure on already over stretched services. Should development be permitted to go ahead

	<p>the infrastructure must be in place on the Norwich road before any work on building site takes place, and clearly this plan demonstrates nothing but a few lines of pointed dismissal. Traffic using Carr Lane would need to be addressed as this road is not suitable in any way to carry cut through traffic.</p> <p>The estate will need to have more affordable housing to encourage and help young people to be able to stay in their homes towns thus helping to serve the range of jobs and help care for the very large volume of elderly. This again will increase traffic volumes tremendously again and shatter those plans.</p> <p>Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.</p> <p>Within the plan for 500 homes here, with car ownership at approximately two per household as an average there will be a large portion of these will use the B1436 adding up to over 350,000 movements yearly.</p> <p>We have not even begun to address the increase in traffic due to tourists, who are so vital to the economy, so we are told by NNDC. If they cannot get here we are destined to have this total mess to ourselves, what a lovely prospect for us all.</p> <p>That would be the biggest abject failure of all by NNDC!!</p>
Modifications requested	Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS588
Response Date	07/03/2022 12:00:00
Name	B Muirhead
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>The plan in general has a lot of excellent thoughts, ideas and projections But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.</p> <p>This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became</p>

a one-way system, this small, narrow country road has become an A road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.

We are faced with a low-level B road taking A road streams, which the County Highways Division acknowledges that it is not safe, but there is nowhere else for the traffic to go. The land that was earmarked for a potential By Pass in previous plans has now been built on so that option is no longer there for future road infrastructure improvements.

The fact is that the simplest and easiest decision is to base a large development on one side of the town which would signify the loss of the village of Roughton which would be swallowed and absorbed into Cromer. Yet Roughton is a village, and a development placed in the area chosen is West of Pine Tree Farm is situated in between parish boundaries Northrepps and Roughton, yet the area is labelled as Cromer. This is a false heading and misinformation and therefore makes this plan misleading and wrong, which therefore presents a false plan to the local electorate and population.

Added to this is the fact that the barriers and space between Cromer and Roughton would simply disappear and Roughton would become a suburb of Cromer and remain in name only. The submission of local and neighbourhood plans along with the stated core strategy of NNDC to protect our local heritage and villages would be dismissed at a stroke, and make the entire operation of the core strategy a joke operation to be easily dismissed and overridden for the sake of convenience and ease of producing this plan.

So where does the proposal to put 500 houses on the land west of the Norwich Road without any proper access except via a track road called Carr Lane, which comes out to a less than substantial road of Roughton Road and Mill Lane with no street lighting, drainage, with secluded house entry, hedges, coupled with insufficient vision.

The improvements required from Norwich Road with a roundabout and a footbridge over that junction or beside it is a most damaging and frightening prospect which is not protecting our heritage. It will become an urban town destroying the countryside at a stroke, which NNDC have used to refuse planning and development decisions for building a single house in which is supposed to be countryside, which is illegal under planning laws.

It will adversely affect Northrepps, Roughton, Southrepps, Felbrigg, Cromer, West & East Beckham, Gresham, Hanworth, Aldborough, West & East Runton.

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Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS585
Response Date	01/03/2022 12:00:00
Name	CM & PK Ward
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	The plan in general has a lot of excellent thoughts, ideas and projections But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.

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Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS587
Response Date	07/03/2022 12:00:00
Name	K Muirhead
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	The plan in general has a lot of excellent thoughts, ideas and projections But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely

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	<p>Lack of infrastructure in roads to support the development continually brings the B1436 into very sharp focus and we all know that North Norfolk as a whole has very poor roads with virtually no funding being put to our roads for safety or maintenance or traffic flow improvements. Emergency services can not easily get through as no pulling in places. The number of extra people will place even more pressure on already over stretched services. Should development be permitted to go ahead the infrastructure must be in place on the Norwich road before any work on building site takes place, and clearly this plan demonstrates nothing but a few lines of pointed dismissal. Traffic using Carr Lane would need to be addressed as this road is not suitable in any way to carry cut through traffic.</p> <p>The estate will need to have more affordable housing to encourage and help young people to be able to stay in their homes towns thus helping to serve the range of jobs and help care for the very large volume of elderly. This again will increase traffic volumes tremendously again and shatter those plans.</p> <p>Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.</p> <p>Within the plan for 500 homes here, with car ownership at approximately two per household as an average there will be a large portion of these will use the B1436 adding up to over 350,000 movements yearly.</p> <p>We have not even begun to address the increase in traffic due to tourists, who are so vital to the economy, so we are told by NNDC. If they cannot get here we are destined to have this total mess to ourselves, what a lovely prospect for us all.</p> <p>That would be the biggest abject failure of all by NNDC!!</p>
Modifications requested	Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS730
Response Date	28/02/2022 08:14:00
Name	Mrs Debbie Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	

Explanation	<p>Whilst there are no designated heritage assets on site, this site surrounds 3 sides of the grade II listed Pine Tree Farmhouse. Part of the house probably dates from the 17th century, with the roof having been raised and additions made in the late C18. The house is of painted flint and brick with a Belgian tile roof. Broadly rectangular in plan, the farmhouse has extensions to rear under catslide roofs.</p> <p>Any development of the site therefore has the potential to impact the setting of the grade II listed building</p> <p>We welcome the reference to Pine Tree Farmhouse at criterion 15.</p> <p>We welcome the preparation of a Heritage Impact Assessment in the Historic Environment Topic Paper. This provides robust evidence of the potential impact on the historic environment and suggests appropriate mitigation measures.</p> <p>The HIA sets out appropriate policy wording for inclusion in the Plan (see page 46). However, unfortunately this wording has not been included in the Plan. The policy needs amending to incorporate the wording from the HIA.</p> <p>We appreciate that criterion 15 of the policy does include some protection for the historic environment, but this falls short of the recommendations of the HIA.</p> <p>We also understand that the site area has changed since the HIA was undertaken. The HIA should be amended to reflect the new site area.</p> <p>We had also advised at Reg 18 that the southern part of the site should be left open for open space, sports provision and allotments with careful landscaping along the eastern edge of the site to protect Pine Tree Farm. These requirements should also be included in the policy.</p>
Modifications requested	<p>Amend criterion 15 to read:</p> <p>Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area including Pine Tree Farmhouse, a grade II listed building. Development should include the following mitigation measures (as set out in further detail in the Heritage Impact Assessment):</p> <ul style="list-style-type: none"> • Retain and strengthening hedges/ trees around and within the site and incorporating tree planting within the site • Introducing a landscape buffer to the southern boundary • landscaped buffer along the western boundary of the site • Dwellings of one or one and a half storey height on the southernmost part of the site. <p>Amend HIA to include new site area.</p> <p>The southern part of the site should be left open for open space, sports provision and allotments with careful landscaping along the eastern edge of the site to protect Pine Tree Farm. These requirements should also be included in the policy.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS692
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	

Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Not Sound- Concerns over impacts on the protected landscape Natural England has previously shared concerns and objections over associated allocation C22/1 (our ref: 279055, dated 22nd May 2019) on the following grounds: • The proposed development will significantly impact the special qualities of the Norfolk Coast Area of Outstanding Natural Beauty (AONB) • The proposal is contrary to local Plan policy, fails to pass the exceptional circumstances text of the NPPF and does not support the objectives set out in the AONB Management Plan Natural England acknowledges the changes in site allocation to form C22/2, but still continues to have the same concerns mentioned above. Natural England has strong reservations about the sustainability of the proposal and the potential for creeping urbanisation into a protected landscape. Despite the positive comments of the proposal in the Sustainability Appraisal, we advise that this allocation may not align with objective SA8 of the report.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS809
Response Date	07/03/2022 18:09:00
Name	
Organisation	Turley Planning
Agent Name	Mr Steve Kosky
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	6.1 This Site is proposed for allocation to facilitate the development of approximately 400new homes, plus specialist elderly care accommodation, on the southern side of Cromer under Policy C22/2

of the Draft Local Plan. The Site comprises 25.7 hectares of open and attractive landscape and is completely undeveloped in character, being particularly open to the south. Whilst the Site partially adjoins the settlement edge, this site, in common with Site C16, also lies wholly within the North Norfolk Coast AONB and is acknowledged in the policy wording to be '*visible from the south and immediate surrounding area*'(10.3.2). The Site is also located directly adjacent to a Grade II Listed Farmhouse along Norwich Road and so development will have an impact on its existing, agrarian, setting.

6.2 As is the case with the site at Overstrand Road, the Council must similarly have regard to the exceptional circumstances test and is required to assess the scope for developing outside of the designated area, or meeting the need for the development in some other way. However again in relation to this Site allocation at Pine Tree Farm we have found no evidence of the exceptional circumstances test having been undertaken, nor how the public interest would be served in bringing this particular site forward, as opposed to other available sites which do not lie within the AONB designation.

6.3 In this regard it is noted that the extent of land to be removed from the AONB in this location has been increased from approximately 300 new homes in the First Draft Plan to approximately 400 new homes in the current Draft Local Plan. However, in addition to the increased impact upon the AONB, there remain significant delivery issues in terms of the increased number of landowners involved and the ability of the development to safely access the highway network.

6.4 With regard to the increased number of landowners, there is no available evidence of any collaboration agreement between the landowners. In particular, the north-western part of site C22/2 is dependent on the remainder of the proposed allocation to provide an access. There is currently no certainty that such an agreement will be reached between the landowners, and in-turn whether the site is deliverable.

6.5 With regard to the increased impact upon the AONB, paragraph 3.5 of the background paper to the Planning Policy Working Party Meeting, held in September 2021, recognises that there will be '*a significant incursion into the Norfolk Coast AONB and would result in localised landscape impacts*'. It further states that '*national guidance advises against such major developments in the AONB, which require particular justification including the consideration of alternative, non AONB, sites*'.

6.6 Turning to the issue of delivery, the planning history for this Site reveals that two major outline planning applications have been submitted in the last four years, one on the western side (PO/18/1551) for a mixed use scheme for up to 185 new homes and one on the eastern side for up to 300 new homes and a new football club (PO/18/2169).

6.7 The western scheme for up to 185 new homes was withdrawn in October 2020, following significant concerns from landscape officers that the impact on the AONB could not be mitigated and that there were also alternative locations for development available. There were also significant concerns in relation to highways, raised by Norfolk County Council, in its capacity as the Highways Authority.

6.8 The larger, eastern, scheme for 300 new homes and a new football club, was submitted in November 2018 and is still undetermined after over 3 years. This is because there remains outstanding objections from officers in terms of both the landscape impact upon the AONB and unresolved highways issues.

6.9 With regard to the impact upon the AONB, landscape officers remain unconvinced that the impacts of this development can be satisfactorily mitigated and that consequently there would be significant harm and impact upon the AONB. These comments are a matter of public record and strongly challenge the assumptions made in the C22/2 policy wording that suitable mitigation can be achieved with a much larger scheme.

6.10 In short, the narrative used to support the C22/2 allocation, does not correlate with the consultation responses received from the statutory consultees as part of the current live application. In this regard, the fact that the application has not been determined since 2018 is indicative of the number of significant unresolved issues, which are effectively glossed over by the allocation policy wording for an even larger scheme.

6.11 Importantly, we can find no tangible evidence that the applicant has undertaken any work to address these landscape and highways concerns nor that the consultees have changed their stance as part

	<p>of the plan making process in terms of the acceptability of developing this Site under Policy C22/2.</p> <p>6.12 With specific regard to highways, the response from the Highways Authority dated 10th October 2019, reveals serious concerns in relation to a number of technical issues, which have not been resolved and which may not actually be resolvable for the larger scale of development envisaged by Policy C22/2.</p> <p>6.13 These concerns, inter alia, relate to the unacceptability of the proposed reduction in width of the A140 to facilitate the required pedestrian footway and the technical unsuitability of the proposals for the southern access roundabout. In this regard, the consultation response states: <i>'the required visibility at the roundabout does not seem to be achievable. The proposal would not gain technical approval of the highway authority to enable it to be delivered.'</i></p> <p>6.14 Furthermore, Policy C22/2 requires the provision of 'a new segregated cycle/pedestrian footway along the Norwich Road including a dedicated footbridge (or suitable alternative) crossing over the railway'. This will require land within the control of Network Rail and there is currently no agreement in place between the landowners and Network Rail to deliver such a crossing.</p> <p>6.15 In this regard, It is clear from Network Rail's 'Shared Value Policy' [FOOTNOTE 5] that when third parties require the use of, or rights over Network Rail land, additional value in that adjacent land can be generated.</p> <p>6.16 The Policy continues that 'Network Rail may properly expect to receive a share of this additional value as consideration for its own disposal of land, grant of rights, or the use of its land' and that 'This is a valuable source of income to Network Rail and is known as Shared Value'.</p> <p>6.17 In the absence of any agreement between Network Rail and either the Council or the landowners there can be no certainty over the deliverability of site C22/2, or indeed whether it is viable taking into account the cost of providing the necessary footbridge, including any payment to Network Rail in accordance with its 'Shared Value' policy.</p> <p>FOOTNOTE 5 Network Rail Shared Value Policy https://www.networkrail.co.uk/wp-content/uploads/2022/04/Shared-Value-policy.pdf</p>
Modifications requested	<p>6.18 In summary, it is clear that the proposed allocation of this site in the form proposed by Policy C22/2 is therefore not sound as it is not positively prepared, justified, effective or consistent with national policy in terms of affording the highest protection to the AONB.</p> <p>6.19 Cumulatively, the combination of the site allocations at Overstrand Road and Pine Tree Farm will together result in the permanent loss of over 32 ha of land from the Norfolk Coast AONB.</p> <p>6.20 This allocation will therefore fail the test of soundness at the Local Plan Examination, unless the Council can demonstrate, with appropriate evidence, that there are no other suitable site alternatives and that the resultant permanent loss of land from the AONB at this particular site location is clearly in the public interest.</p> <p>6.21 This is however demonstrably not the case.</p>
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Pine Tree Farm, Norwich Road
Consultation Point Number	Policy C22/2
Section of the Plan	Policy C22/2 Land West of Pine Tree Farm, Norwich Road
ID	LPS596
Response Date	23/02/2022 12:00:00
Name	B, C & D Connelly & A Foster
Organisation	

Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>The plan in general has a lot of excellent thoughts, ideas and projections But there are a lot of omissions. The best, and most long running example in north Norfolk is the B1436 Road, which is barely a B road having been hewed out of the old coach track from the mid 1760's.</p> <p>This road is not capable of taking the current volume of traffic in whatever denominations one cares to look at it. Since Cromer became a one-way system, this small, narrow country road has become an A road in traffic levels easing the traffic away from Cromer Town Centre. This was done against official advice at the time, as the road could not take the traffic levels then, let alone now.</p> <p>We are faced with a low-level B road taking A road streams, which the County Highways Division acknowledges that it is not safe, but there is nowhere else for the traffic to go. The land that was earmarked for a potential By Pass in previous plans has now been built on so that option is no longer there for future road infrastructure improvements.</p> <p>The fact is that the simplest and easiest decision is to base a large development on one side of the town which would signify the loss of the village of Roughton which would be swallowed and absorbed into Cromer. Yet Roughton is a village, and a development placed in the area chosen is West of Pine Tree Farm is situated in between parish boundaries Northrepps and Roughton, yet the area is labelled as Cromer. This is a false heading and misinformation and therefore makes this plan misleading and wrong, which therefore presents a false plan to the local electorate and population.</p> <p>Added to this is the fact that the barriers and space between Cromer and Roughton would simply disappear and Roughton would become a suburb of Cromer and remain in name only. The submission of local and neighbourhood plans along with the stated core strategy of NNDC to protect our local heritage and villages would be dismissed at a stroke, and make the entire operation of the core strategy a joke operation to be easily dismissed and overridden for the sake of convenience and ease of producing this plan.</p> <p>So where does the proposal to put 500 houses on the land west of the Norwich Road without any proper access except via a track road called Carr Lane, which comes out to a less than substantial road of Roughton Road and Mill Lane with no street lighting, drainage, with secluded house entry, hedges, coupled with insufficient vision.</p> <p>The improvements required from Norwich Road with a roundabout and a footbridge over that junction or beside it is a most damaging and frightening prospect which is not protecting our heritage. It will become an urban town destroying the countryside at a stroke, which NNDC have used to refuse planning and development decisions for building a single house in which is supposed to be countryside, which is illegal under planning laws.</p> <p>It will adversely affect Northrepps, Roughton, Southrepps, Felbrigg, Cromer, West & East Beckham, Gresham, Hanworth, Aldborough, West & East Runton.</p> <p>All this is stipulated here, before we even look at the traffic flow along and entry and exit into the B1436 at either end.</p> <p>Where this plans sits if implemented it will lead to significant and a deadly increase in traffic on B1436 and Metton / Hall road. This just simply cannot happen as it cannot be used as an A road but treated as a very poorly laid out B road.</p>

	<p>We have no pavements for school children, no policing for speed, roads barely wide enough for two lorries, and a significant increase in farm traffic with contract farming. Lack of funding for hedge/verge cutting to make the roads safer.</p> <p>We already know that the B1436 cannot ever be closed after admissions by the Director of Highways and the local Highways Spokesperson. This was admitted to the Police at a recent public meeting. The roads here can not take any more volume at all but due to this plan they will have to without an infrastructural plan. This brings us back to the basic reason of this plan being unsound. At a recent meeting the director of highways stated that there was no plans to improve the B1436 in the foreseeable future. There is no budget as stipulated and agreed by the local highways spokesman and that the situation is only going to get worse.</p> <p>Residents are no longer able to walk from their properties. The only way to get anywhere is by car increasing traffic, emissions, volume and intensity.</p> <p>There is also the proposed development for 30 homes down Back Lane which will ensure that cars will come to the Metton Road Junction as access to Norwich Road there with a steep uphill gradient and a right turn does not bear thinking about during rush hours at least.</p> <p>Lack of infrastructure in roads to support the development continually brings the B1436 into very sharp focus and we all know that North Norfolk as a whole has very poor roads with virtually no funding being put to our roads for safety or maintenance or traffic flow improvements. Emergency services can not easily get through as no pulling in places. The number of extra people will place even more pressure on already over stretched services. Should development be permitted to go ahead the infrastructure must be in place on the Norwich road before any work on building site takes place, and clearly this plan demonstrates nothing but a few lines of pointed dismissal. Traffic using Carr Lane would need to be addressed as this road is not suitable in any way to carry cut through traffic.</p> <p>The estate will need to have more affordable housing to encourage and help young people to be able to stay in their homes towns thus helping to serve the range of jobs and help care for the very large volume of elderly. This again will increase traffic volumes tremendously again and shatter those plans.</p> <p>Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.</p> <p>Within the plan for 500 homes here, with car ownership at approximately two per household as an average there will be a large portion of these will use the B1436 adding up to over 350,000 movements yearly.</p> <p>We have not even begun to address the increase in traffic due to tourists, who are so vital to the economy, so we are told by NNDC. If they cannot get here we are destined to have this total mess to ourselves, what a lovely prospect for us all.</p> <p>That would be the biggest abject failure of all by NNDC!!</p>
Modifications requested	Therefore no houses must be built if approved until the infrastructure has been fully completed. Anything else is abject failure in a duty of care to the population as a whole. This must be bound in legal process and this local plan makes no ref to that.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Consultation Point Title	Land North of Rudham Stile Lane
Consultation Point Number	Policy F01/B
Section of the Plan	Policy F01/B Land North of Rudham Stile Lane
ID	LPS472
Response Date	07/03/2022 17:25:00
Name	
Organisation	Trinity College Cambridge
Agent Name	Mrs Kirstie Clifton
Agent Organisation	Define Planning and Design Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>SEE ATTACHED FILE</p> <p>Trinity College Cambridge support the desire to ensure the comprehensive development of Land North of Rudham Stile Lane, but propose that the allocation policy is slightly amended as set out below to ensure that it meets the tests set out under NPPF paragraph 35.</p> <p>Suitability</p> <p>The NNLP defines Fakenham as a Large Growth Town, being one of three main centres in the district with the broadest range of day-to-day services, including higher order services and facilities.</p> <p>The site lies along the edge of the settlement and within walking distance of those services and facilities.</p> <p>There are no known constraints to development of the site, which is similar in character to land to the east that already benefits from planning permission.</p> <p>Quantum of Development</p> <p>As noted above, Trinity College Cambridge controls the majority of the site (17.7ha) and considers that area to have capacity for approximately 400 dwellings plus elderly care units. This acknowledges the NNLP approach to directing higher density development (40dph) to town locations to ensure efficient use of land, but also recognises the need for flexibility to provide a mixed development character and given the edge of settlement location.</p> <p>Given some existing uses may be retained, in particular existing sports facilities, it is proposed that the residential development capacity should include a range from 350-560 dwellings, plus 100 units of elderly care accommodation, open space and supporting infrastructure. In this way, the policy will avoid unnecessarily restricting the delivery of development across the majority of the site within the control of Trinity College Cambridge.</p> <p>The location of the site adjacent to the A148 and other non-residential uses to the east offers an opportunity to consider additional non-residential uses including local retail or employment uses that could be appropriately located adjacent to the primary residential use.</p> <p>As such, it is proposed that the policy should allow for the consideration of non-residential uses where they are justified and accord with this and other policies within the Plan, and are fully tested through a comprehensive masterplan, as proposed under Part 1 of the policy.</p>

This requirement should be added as an additional part to the policy (noted as Part 11. below).

Masterplan

Part 1. of the policy requires the 'prior approval' of a Masterplan to address access and sustainable transport, layout, landscaping, phasing and conceptual appearance. The preparation of such a comprehensive Masterplan is supported and essential for the delivery of development across the site that is integrated with its surrounds.

Whilst it is essential that any applications for development are informed by such a Masterplan and that these are approved prior to granting planning permission, to ensure timely and consistent decision making the wording should be amended so as not to prevent the opportunity for this to be considered 'as part of' any planning application.

As such, we would propose the same approach as Part 4. of the policy that requires the 'submission, approval and implementation' of a Masterplan.

Comprehensive Access Strategy and Transport Assessment

Part 2. of the policy appropriately require detailed consideration of access and transport matters, both on and off site. This is directly related to the development capacity of the site and, therefore, any variations in the quantum of development. It is, therefore, also essential that any mitigation noted within the policy allows for consideration of any variables in the quantum of development.

As such, we would propose the same approach as Part 4. of the policy, thereby requiring the 'submission, approval and implementation' of a comprehensive access strategy and Transport Assessment.

Mains Water and Drainage Strategy

Part 3. of the policy requires the provision of off-site mains water reinforcement. This is supported in principle, but should clearly reflect the scope of any proposed development and associated planning application. As such, it is proposed that this part of the policy should refer to the 'appropriate' provision of off-site reinforcement, which reflects the approach to Part 9 of the policy.

Part 4. of the policy requires the submission, approval and implementation of a Foul Water Drainage Strategy. This is supported and allows for this information to be provided and considered in conjunction with any planning application for development. This approach is considered appropriate for all technical information under other parts of the policy.

Existing Sporting Uses

Part 5. of the policy requires the retention or replacement of existing sporting uses, which is supported.

As noted in relation to Quantum of Development above, given the significant land area within the allocation currently providing sporting uses and the necessary flexibility needed to allow these to be retained, this part of the policy would benefit from making specifically reference the existing land area (circa 5.05ha) to reinforce the proposed range in development capacity.

Multi-functional Open Space and Maintenance

Part 6. of the policy requires on site delivery of not less than 7.53ha of multi-functional open space, together with measures for its on-going maintenance. The importance of providing appropriate open space is fully supported, but the quantitative measure does not reflect the variation in land area that might come forward should existing sports areas be retained or proposed for expansion.

Indeed, the provision of open space should be directly related to the scale and content of development proposed in accordance with Policy HC 2 and Appendix 2 of the Plan, which set both quantitative and qualitative standards. As such, it is proposed that the policy is amended to omit reference to a specific quantum of open space (given the variation in areas to come forward for development) and instead for this to refer specifically to the provision of open space in accordance with the proposed standards that will also address variations in the specific uses proposed.

Health Impact Assessment

Part 7. of the policy requires the submission and approval of the findings of a Health Impact Assessment. We note that this has not been applied to all allocations above the current proposed threshold for the scale of development and, in this respect, lack consistency across the Plan. However, we do not consider there to be a need to repeat this policy requirement, given the opening text to the policy

states that planning permission will be granted subject to compliance with the policies of this Plan.

There are numerous policies and thresholds that might apply to the site and the scale of development proposed in future, and compliance and/or consistency with these is expected. Equally should thresholds change from the current draft, there is a risk that that requirement may no longer apply. As such, it is proposed that this part of the policy is deleted.

Phasing

Part 8. of the policy requires 'appropriate contributions' to GIRAM, which is fully supported.

Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy

Part 9. of the policy requires 'appropriate contributions' to GIRAM, which is fully supported and demonstrates the need for contributions that are proportionate to the scale of development proposed, including green infrastructure and sports and recreation areas.

Road, Drainage and Educational Infrastructure Capacity

Part 10. of the policy as currently drafted requires the 'prior demonstration' of adequate capacity in infrastructure. Whilst this is accepted in principle, as noted already, it is critical that this is considered in the context of the specifics on the proposed development and, therefore, in conjunction with any planning applications. As such, it is proposed that the word 'prior' is omitted.

Given the above, the following minor amendments to the policy wording are proposed as set out below:

PROPOSED AMENDED WORDING - Policy F01/B Land North of Rudham Stile Lane

Land amounting to 26.5 hectares (including 5.05 hectares of existing sporting uses), as defined on the Policies Map, is allocated for the residential development of between 350 and 560 dwellings, 100 units of elderly persons' accommodation, public open space, and associated on and off-site infrastructure.

Planning permission will be granted subject to compliance with the policies of this Plan and the following site specific requirements:

- 1 The submission, approval and implementation of a comprehensive masterplan to address access and sustainable transport, layout, landscaping, phasing and conceptual appearance;
- 2 The submission, approval and implementation of a comprehensive access strategy and Transport Assessment providing for safe and convenient access to the A148, together with any necessary junction improvements along the length of Fakenham by-pass including at the A148/B1105 and A148/A1065 junctions;
- 3 Appropriate provision of off-site mains water reinforcement;
- 4 The submission, approval and implementation of a Foul Water Drainage Strategy, including any enhancements and that it is demonstrated that there is adequate capacity in the water recycling centre;
- 5 Retention or replacement of existing sporting uses totalling circa 5.05 hectares including the rugby club and sports centre;
- 6 On site delivery of multi-functional open space to reflect allocated and/or retained uses in accordance with Open Space Standards set out in Appendix 2 of the Plan;
- 7 Submission, approval and implementation of the findings of a Health Impact Assessment;
- 8 The submission and approval of a development phasing plan which demonstrates the delivery of all aspects of the allocated and/or retained uses, including not less than 100 units of specialist elderly persons accommodation;
- 9 Appropriate contributions will be secured towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS);
- 0 Demonstration that there is adequate capacity in road, drainage and educational infrastructure taking account of existing planned growth; and
- 1 If appropriate, the provision of non-residential uses will only be considered where this can be justified in accordance with this and other policies within the Plan, and forms part of a comprehensive masterplan.

Modifications requested

SEE ATTACHED FILE

	<p>It is proposed that the following minor amendments to the policy wording are incorporated to ensure that it meets the tests set out under NPPF paragraph 35:</p> <p>PROPOSED AMENDED WORDING - Policy F01/B Land North of Rudham Stile Lane</p> <p>Land amounting to 26.5 hectares (<u>including 5.05 hectares of exiting sporting uses</u>), as defined on the Policies Map, is allocated for <u>the residential development of between 350 and 560 dwellings, 100 units of elderly persons' accommodation, public open space, and associated on and off-site infrastructure.</u></p> <p>Planning permission will be granted subject to compliance with the policies of this Plan and the following site specific requirements:</p> <ol style="list-style-type: none"> 1 <u>The submission, approval and implementation of a comprehensive masterplan to address access and sustainable transport, layout, landscaping, phasing and conceptual appearance;</u> 2 <u>The submission, approval and implementation of a comprehensive access strategy and Transport Assessment providing for safe and convenient access to the A148, together with any necessary junction improvements along the length of Fakenham by-pass including at the A148/B1105 and A148/A1065 junctions;</u> 3 <u>Appropriate provision of off-site mains water reinforcement;</u> 4 <u>The submission, approval and implementation of a Foul Water Drainage Strategy, including any enhancements and that it is demonstrated that there is adequate capacity in the water recycling centre;</u> 5 <u>Retention or replacement of existing sporting uses totalling circa 5.05 hectares including the rugby club and sports centre;</u> 6 <u>On site delivery of multi-functional open space to reflect allocated and/or retained uses in accordance with Open Space Standards set out in Appendix 2 of the Plan;</u> 7 <u>Submission, approval and implementation of the findings of a Health Impact Assessment;</u> 8 <u>The submission and approval of a development phasing plan which demonstrates the delivery of all aspects of the allocated and/or retained uses, including not less than 100 units of specialist elderly persons accommodation;</u> 9 <u>Appropriate contributions will be secured towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS);</u> 0 <u>Demonstration that there is adequate capacity in road, drainage and educational infrastructure taking account of existing planned growth; and</u> 1 <u>If appropriate, the provision of non-residential uses will only be considered where this can be justified in accordance with this and other policies within the Plan, and forms part of a comprehensive masterplan.</u>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	As the agent promoting an area of Land North of Rudham Stile Lane, Define Planning and Design Ltd wish to reserve the right to participate in the hearing sessions in relation to Policies DS1 and F01/B.
Attachment(s)	DE033_F01-B Boundary Plan REVA.pdf (1) NNLP Reg 19 Repls - Define Planning and Design on behalf of Trinity College Cambridge.pdf (1)
Consultation Point Title	Land North of Rudham Stile Lane
Consultation Point Number	Policy F01/B
Section of the Plan	Policy F01/B Land North of Rudham Stile Lane
ID	LPS691
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	

Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Sound - Subject to project level HRA. In line with the plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal. This allocation is also located within or in close proximity to the Norfolk Coast AONB. Due consideration should be taken to determine any adverse effects on the special qualities of the protected landscape. Priority habitats and species should also be considered to assess the impact of the development proposals on local wildlife, in line with paragraphs 175 and 176 of the NPPF.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land North of Rudham Stile Lane
Consultation Point Number	Policy F01/B
Section of the Plan	Policy F01/B Land North of Rudham Stile Lane
ID	LPS806
Response Date	07/03/2022 18:09:00
Name	
Organisation	Turley Planning
Agent Name	Mr Steve Kosky
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	SEE ATTACHED FILE

3.16 The current Site Allocations DPD was adopted in February 2011 following the adoption of the Core Strategy in September 2008. The Core Strategy and the Site Allocations DPD both relate to a plan period of 2001-2021.

3.17 The Site Allocations DPD allocates two sites for residential development in Fakenham, totalling 860-980 homes, including Land North of Rudham Stile Lane (Policy F01) for 800-900 homes, and a collection of other uses, with the possibility of the site accommodating additional development beyond 2021.

3.18 The western part (approximately 50%) of Site F01 is currently identified in the emerging Local Plan as Site F01/B (with the eastern part upon which outline planning permission has been granted being referred to as Site F01/A).

3.19 The emerging Local Plan, which covers the period 2016-2036, proposes the allocation of four sites for residential development in Fakenham, including the Land North of Rudham Stile Lane site (Policy F01/B) for the delivery of 560 homes, 100 units of specialist elderly accommodation, and other uses. However Pigeon have significant concerns with regards to the delivery of this allocation.

3.20 These concerns are demonstrated in that as of April 2016 the Council projected that the main part of the site (listed as delivering 800 dwellings overall) would commence actual delivery from April 2019, at a rate of 30 dpa, with delivery increasing thereafter to between 40-100 dpa.

3.21 However, by April 2017 the Council had pushed back the projected delivery by a year, with the main part of the site (now listed as delivering 950 dwellings overall following the submission of an outline planning application – ref. PO/17/0680) commencing actual delivery from April 2020, but at a rate of only 60 dpa.

3.22 By April 2018 the Council had pushed back the anticipated delivery by another year, with the main part of the site not scheduled to commence actual delivery until April 2021, still at a rate of only 60 dpa.

3.23 By April 2019 the Council had pushed back delivery by yet a further year, with the main part of the site not scheduled to commence actual delivery until April 2022, albeit now at an increased rate of 75 and then 100 dpa, this being an effort to retrospectively bolster the 5YHLS.

3.24 By April 2020 the Council was stating that a committee decision on the outline planning application was expected in the summer of 2020, with actual delivery still scheduled to commence in April 2022, but now at a rate of just 50 dpa.

3.25 The outline application was eventually determined in October 2021, almost 4 and half years after submission, and over a decade after the site was first allocated.

3.26 At the time of writing no applications have been submitted to the very many 'pre-commencement' conditions, some of which require extensive investigation and other work to be undertaken, or for the approval of any of the reserved matters.

3.27 Whilst an updated delivery trajectory is awaited, it is patently clear that actual delivery of homes will not commence within the next few months as per that latest housing trajectory and that this will have to be pushed back yet again, most likely by at least two to three years – i.e. to April 2025 or beyond.

3.28 The effect of the above is such that housing delivery on the main part of Site F01(/A) will not commence until some 24 years after the base date of the Plan that led to its allocation, 14 years after the site was allocated, and 8 years after the submission of the outline planning application.

3.29 Assuming that actual delivery does commence in April 2025, and is at the latest projected rate of 50 dpa, delivery will likely continue until March 2044, some 8 years beyond the end of the plan period for the new Local Plan.

3.30 The emerging Plan includes (p. 266) a trajectory for Site F01 (/A) as set out in Table 1 (see **Appendix 3**). There is no indication as to the source of, or justification for, this trajectory, which conveniently ensures that the final dwelling is delivered just ahead of the end of the new plan period.

3.31 At the very least, if delivery on the site were to slip by a year, the site would fail to deliver 90 of the projected homes; however, if the site does indeed only deliver an average of 50 dpa from April 2025 onwards, it will fail to deliver 400 of the projected homes.

	<p>3.32 In summary, it is considered that there remain significant concerns regarding the deliverability of the homes planned on Site F01 within the plan period - none of the 950 homes proposed on the main part of Site F01 (A) will have been delivered during the current planned period, and it is likely that over a third will not even be delivered during the forthcoming plan period.</p> <p>3.33 For these reasons the allocation for Land North of Rudham Stile Lane (Site F01/A) is not positively prepared, justified, effective or Consistent with National Policy.</p>
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	Appendix 3 - Projected Delivery from Sites F01 (A) and NW62 (A).pdf

Policy F02 Land Adjacent to Petrol Filling Station, Wells Road

Consultation Point Title	Land Adjacent to Petrol Filling Station, Wells Road
Consultation Point Number	Policy F02
Section of the Plan	Policy F02 Land Adjacent to Petrol Filling Station, Wells Road
ID	LPS506
Response Date	07/03/2022 21:27:00
Name	Mr Mike Jones
Organisation	Norfolk Wildlife Trust
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Aerial photographs suggest that cultivation ceased on this parcel of land approximately 15 years ago. The site may have developed some ecological value as grassland in the intervening period and as such will require an ecological assessment prior to any planning application.
Modifications requested	We recommend that the policy wording is updated to include reference to the need for an ecological assessment as part of any application.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land Adjacent to Petrol Filling Station, Wells Road
Consultation Point Number	Policy F02
Section of the Plan	Policy F02 Land Adjacent to Petrol Filling Station, Wells Road
ID	LPS418
Response Date	07/03/2022 16:44:55
Name	
Organisation	Shell UK Ltd
Agent Name	Mr James Sheppard
Agent Organisation	CBRE
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes

Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>Proposed site allocation F02 (Land Adjacent to Petrol Filling Station, Wells Road): SUPPORT</p> <p>The freehold interest of the entire site area is owned by Shell UK Limited, whom also serve as promoters of this site for residential development. Shell UK Limited confirm the site is available and deliverable within the next five years providing new homes, helping to support the District Council's strategic housing need requirements, including provision of onsite affordable housing. Proposed allocation F02 will serve to help meet the housing requirements as set out in draft policies SS1 and HOU1. Specifically, the approximate provision of 70 homes, including a policy compliant level of affordable homes, will tangibly contribute to Fakenham's overall housing delivery over the initial 5 year period of the new Local Plan.</p> <p>The site is sustainably located in close proximity to the public services and town centre uses in Fakenham, a proposed 'Large Growth Town' in draft policy SS1. This includes nearby schools such as Fakenham Junior School and Fakenham Academy Secondary School and Sixth Form. The site's location meets the aspirations of draft Policy CC1, requiring development to be located as near to existing services and facilities as possible. In addition, the site has good accessibility to local bus stop/routes providing accessibility to facilities further afield and connecting to the wider Fakenham area. This includes access to nearby bus routes providing services into Fakenham at the site's northern tip, at the junction of Toll Bar and Wells Road (circa 0.2 miles).</p> <p>The site is bounded to the west by the A1065, providing a physical boundary to development and a 'rounding off' of the proposed settlement boundary. There are no constraints to development of the site such as public rights of way, national trails or town/village green designations within the extent of the site area. The site area is unconstrained in relation to Conservation Areas, listed buildings/heritage assets, TPOs and flood risk. There are no topographical constraints that could constrain development of the site.</p> <p>The site can be developed out for new homes in compliance with both the site-specific policies and the general policies of the draft Local Plan. The site can be developed out in a comprehensive manner, delivering all aspects of the allocated use and provide all necessary infrastructure. As part of any residential development scheme, green infrastructure will be provided to support the development, including amenity green space and play space, in line with draft Policy HC2. In addition, development can be sensitively designed, strong landscaping can be incorporated along the western boundary of the site, landscape buffers can be enhanced along the eastern and southern boundaries of the site, and access can be adequately provided off Wells Road.</p> <p>There is no current vehicular access to the site; however it is located adjacent to the A1065 which the Council acknowledge is a 'Principal Transport Route'. It has been established through technical assessment and indicative design (provided by TPA), that access/egress is achievable, using land to the east of the filling station forecourt onto Wells Road.</p> <p>In summary, it has been demonstrated through meaningful engagement with the Local Planning Authority, that proposed allocation F02 is both available and deliverable within the first five years of the new local plan being adopted.</p> <p>We are of the strong view that the draft plan is sound by virtue of it being positively prepared, justified, effective, and consistent with national policy. We are of the view the plan is legally compliant.</p>
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land Adjacent to Petrol Filling Station, Wells Road

Consultation Point Number	Policy F02
Section of the Plan	Policy F02 Land Adjacent to Petrol Filling Station, Wells Road
ID	LPS693
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Sound – Subject to project level HRA. The policy supports residential developments which may result in an increase in recreational use of designated sites. In line with the plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Policy F03 Land at Junction of A148 & B1146, Opposite Petrol Filling Station

Consultation Point Title	Land at Junction of A148 & B1146, Opposite Petrol Filling Station
Consultation Point Number	Policy F03
Section of the Plan	Policy F03 Land at Junction of A148 & B1146, Opposite Petrol Filling Station
ID	LPS694
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Sound – Subject to project level HRA. The policy supports residential developments which may result in an increase in recreational use of designated sites. In line with the plan’s HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Policy F10 Land South of Barons Close

Consultation Point Title	Land South of Barons Close
Consultation Point Number	Policy F10
Section of the Plan	Policy F10 Land South of Barons Close
ID	LPS363
Response Date	05/03/2022 12:19:00
Name	Mr T. C. Duffy
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	This land will be supporting policy and will bring major benefits for the town of Fakenham and the wider environment.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To reiterate the soundness of the plan and how the unique opportunity of the land location that is available for development. This land will be supporting policy and will bring major benefits for the town of Fakenham and the wider environment.
Attachment(s)	
Consultation Point Title	Land South of Barons Close
Consultation Point Number	Policy F10
Section of the Plan	Policy F10 Land South of Barons Close
ID	LPS507
Response Date	07/03/2022 21:43:00
Name	Mr Mike Jones
Organisation	Norfolk Wildlife Trust
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No

Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	We repeat our previous objection to the inclusion of this site in the housing allocations due to concerns over its location on the floodplain. Floodplains are vital areas of habitat which cannot be replicated elsewhere, and the floodplain around the River Wensum SAC is functionally linked to the health of the river itself. The inclusion of housing at this location will further enclose the floodplain, limiting the options for the future restoration of the river and its supporting habitats.
Modifications requested	The river and its floodplain are major green infrastructure assets for the Fakenham and the district and we recommend it is retained as green space.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	We wish to support our recommendation that the site should not be included as an allocation in the plan due to its proximity to the River Wensum SAC.
Attachment(s)	
Consultation Point Title	Land South of Barons Close
Consultation Point Number	Policy F10
Section of the Plan	Policy F10 Land South of Barons Close
ID	LPS599
Response Date	24/02/2022 11:18:00
Name	Mr Christopher Yardley
Organisation	Fakenham Area Conservation Team (FACT)
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>The Fakenham Area Conservation Team (FACT) would wish to make a representation to object to the proposed inclusion of land for housing and new area of public open space for the above development on the following grounds.</p> <p>The land is on the flood plain of the River Wensum which is classified as a Special Area of Conservation and SSSI for its internationally important wildlife value.</p> <p>The inclusion of this area in the Local Plan was objected to by a number of significant conservation organisations who know and understand the importance of the ecology of the area. This included the Hawk and Owl Trust (who have a major reserve at nearby Sculthorpe also on the Wensum), Pensthorpe Natural Park (who similarly have a reserve on the Wensum nearby) and Norfolk Wildlife Trust.</p> <p>All of us are deeply concerned by the development of housing and changes in habitat / disturbance to this area which is within this internationally important area. The impacts have clearly not been fully</p>

	or appropriately assessed as the obvious inference of the development is that it will remove habitat which is directly associated with, and connected to, the Protected wildlife features of the Wensum, and will adversely impact by reason of disturbance (lighting, runoff, noise and human occupation both within the housing site and the new 'open space') the special qualities of this area. Reduction and fragmentation of habitat in such a key location is contrary to the policy requirements of the NPPF, and clearly represents an incompatibility between the Local Plan the protection of Protected habitats and the retention / enhancement of biodiversity. The inclusion is also contrary to the policy requirements on Local Authorities in relation to the Environment Act 2021 and Natural Environment and Rural Communities Act 2006.
Modifications requested	Therefore we object to the inclusion of this area on the basis of impacts on Protected Habitats and impacts on biodiversity which are unsustainable and contrary to national planning policy guidance.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land South of Barons Close
Consultation Point Number	Policy F10
Section of the Plan	Policy F10 Land South of Barons Close
ID	LPS696
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Sound - Subject to project level HRA. This policy supports residential developments which may result in an increase in recreational use of designated sites. This allocation also borders ditches that, subject to modifications, will discharge into the River Wensum SSSI and SAC. Water pollution is a contributing factor to the unfavourable condition of the River Wensum SSSI and SAC, as explored in the Site Improvement Plan. And so, in line with the plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to consider appropriate drainage strategies and determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal.
Modifications requested	
Appear at examination hearing session(s)?	

* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land South of Barons Close
Consultation Point Number	Policy F10
Section of the Plan	Policy F10 Land South of Barons Close
ID	LPS784
Response Date	04/03/2022 09:37:00
Name	Mr Adam Herculson
Organisation	Norfolk Flint Ltd
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	
* Yes	
* No	
Has the duty to cooperate been met?	
* Yes	
* No	
Do you consider the plan to be Sound?	
* Yes	
* No	
Reason(s) not Sound	
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	<p>I understand the council are required to provide new homes for a growing population and would generally support new growth to a town. I am, however, concerned about the quantity of housing allocated to this site in this particular location. I have lived at the above address for 10 years and would like to draw the councils attention to the following important and relevant points concerning landscaping, ecology, highways, privacy and surface water drainage.</p> <p>Landscaping The site is situated close to the river wensum and is in close proximity to a SSSI. The neighbouring properties to the south of the town enjoy a variety of wildlife as they are on the edge of the town at present. A high density development on this site would drastically reduce the amount of wildlife which would normally be seen visiting the properties. As we are all aware, wildlife in general brings comfort and helps people with mental health issues in urban and I feel high density housing would have a detrimental effect on these people, particularly the elderly and disabled, who are unable to get into the countryside to enjoy the wildlife.</p> <p>I have mature trees along my Western boundary which abuts the proposed site, the most significant of which is close to The Old Cart shed to the North of my land, which is rented by my long term tenant. I have also planted more trees and bushes to this boundary (please also see ecology and highways below), which are only quite young at present.</p> <p>Landscaping considerations I would ask the council to consider, in this instance, a development with far fewer properties, staggered, or irregular in layout, with heavily planted gardens to encourage the wildlife to filter through the development and into the gardens beyond which would otherwise be adversely affected. I would also ask the council to ensure the properties are set well back to prevent any possible future grievances regarding shading of houses or gardens by the trees as they mature. I would also ask the council to consider planting a much wider boundary of native trees and shrubs all the way down alongside the North and West of the ditch leading to the poplar wood and also widening the existing Eastern planting scheme carried out by me. This would provide a positive link for nature and also eliminate the possibility of future</p>

complaints regarding my storage area which will be in clear view of the new development. This would probably help the developer with sales too. The extra planting would also allow my family and my tenants families to enjoy the privacy as we do now.

Ecology

As part of a planning application submitted by me (PF/13/0414) decided 17/09/13, a bat survey was carried out by Phillip Parker Associates. Within the survey, it points out that the Eastern boundary of the proposed development site (my West boundary) is used by a significant amount of bats from both my properties and from properties further into town – the exact location of which was unknown at the time of the survey. I have had a further, more recent survey carried out by Torc Ecology, who confirmed the same – the latest survey was carried out last year. The boundary forms an important flight corridor for bats from the town to the river Wensum. I would like to also make it known that as part of my mitigation works, a bat loft was built within the roof space of The Old Cart shed, the gable of which directly abuts the proposed sites Eastern boundary. Although the loft showed little signs of use during the latest survey, it should be noted that it is there and that the proposed site should reduce the possibility of this space from being used in the future. There are also a number of bat boxes along the boundary. (Please also see highways below)

Ecological considerations

I would like the council to consider enlarging / widening the existing hedgerow and plant up a wide thicket / hedgerow to the North of the ditch owned by me which leads to the poplar wood to provide a positive link for bats and any other nature from the wensum valley into the town. Please also consider setting back the proposed properties enough so as not to cause nuisance to the wildlife using the hedgerow from light pollution and noise from the houses and their gardens.

Highways

Our entry and egress to and from Barons Hall Farm is via a shingle track at present, which is at present, mainly unused by any other vehicles. As Barons Hall Lane will be extended past the front of our property and will become adopted, I am concerned that the visibility splay will be inadequate – even with a 20mph limit imposed on this section of roadway. I have erected a fence to the West of the entrance along my North boundary to maintain the privacy of my tenants. I have also planted a hedge to the East of the entrance along my North boundary to maintain our privacy. I am concerned that once the hedge grows, we will not have visibility in either direction without our vehicle entering onto the highway which could possibly cause an accident. It would not be possible to move the fence or hedge because of existing constraints. (Please also read surface water below).

The council will be aware of the nearby infants school and its close proximity to Barons Hall Lane. The road is currently used by a lot of the parents to park their cars whilst dropping off children at the school which has caused problems for us accessing our property on several occasions. We have complained to the police and written to the school, but to no avail. The parking, as it is at present, at drop off / collection time would mean that an emergency service vehicle would not be able to access the proposed site without significant delays which could cause a possible danger to life. The overwhelming increase in traffic from 55 dwellings from the site could also cause a danger to infants – especially as many trips past the school would be at drop off time because of parents taking children to school and people going to work. I would like also like to bring to the councils attention that my neighbours and I have had several near misses due to drivers pulling out of Barons Close without looking at all - we can only assume they think the road to their estate continues around the corner and we must give way coming up from the bottom??

The new proposed road will run very close to The Old Cartshed and Dairy Barn and I would ask the council to consider the negative impact on these (and surrounding) properties if 55 dwellings were permitted.

Highways considerations

It would be safer and more practical to form a new entrance through the existing Western boundary via our car parking area, which could link up to the new highway allowing safe entry and egress to and from the new highway. If it was agreed to form a new entrance, then I ask the highways to consider the ecological impact of the new roadway referring to my comments regarding the bat loft in ecology above. The road would possibly need to be set away from the building allowing a thicket to be planted close to the building to avoid headlight glare onto the bat loft entrance. The thicket would need to continue along the West edge of the roadway. A low density development would be welcomed by properties close to the proposed new highway. Could

you also please consider the parking arrangements and Barons Close junction.

Privacy

We bought our property because it was on the edge of town and provided privacy. We would not like three storey town houses, or any property set close to our boundary creating overlooking which would be detrimental to our peace and privacy.

Surface Water

The river Wensum is an important feature of the town and should be enjoyed by all. The council are probably aware of the flooding issues caused by the extreme weather conditions of today. I accept that the meadows in my ownership to the South of my property are flood meadows and as such are prone to flooding. I would, however, like to point out that over the past few years, the meadows have been flooded for longer and longer each year and this seems to be getting worse.

The footpath by the river has all but been destroyed and is now in need of repair by highways. I understand that an appraisal for surface water drainage will be carried out to ascertain the viability of the proposed development, but these reports are often construed in the developers favour. The surface water that runs into my ditch has to then run under the railway line through a culvert. The culvert acts as a restrictor and forms a bottleneck which holds water back on my land, my ditch is also fed by the Kinnertons roof (which now feeds directly into the ditch instead of the attenuation pit) and surface water runoff from the meadow which is subject to this application. The current owners are aware of the drainage problems around this area and have themselves attended a meeting held by David Hunter from Fakenham Racecourse and various landowners abutting the river Wensum to discuss the issue. If the development were to go ahead with 55 dwellings together with the associated access roads, then I suspect, with an attenuation pit, the existing watercourse would be wholly inadequate to take the amount of water produced from the hardstanding and roofs. The water levels would remain higher for longer and would have drastically less capacity to take the next downpour. My meadow also takes the surface water from Norwich Road via Barons Meadow which should also be taken into consideration.

Although I am pleased that there will possibly be more 'open spaces' to the South of the proposed site, the water will back up on my land for longer periods and will remain flooded for longer periods, I wonder how often the land which is on offer as amenity land would be accessible to the public and question what state the land would get into with heavy foot traffic over sodden / flooded ground. I would also urge the council to consider the effects on the existing river Wensum footpath caused by even more surface water runoff. The land offered for public use to the South of the site should not be to the detriment of the wider used, existing footpath running alongside the river and around other areas 'downstream' from the proposed site.

The footpath to the South of Valley Way leading to the three brick arches and to the West of my woodland was flooded over last year and was impassable to the general public. This would have been as a direct result of water running off my land under the railway culvert and into the ditch which runs through my woodland directly to this area before entering onto Pensthorpe's land – more surface water to this area would mean this would be impassable for longer periods.

Surface Water considerations

I would urge the council to consider fewer dwellings with large gardens to allow surface water to naturally dissipate and to use permeable surfaces. The water table sits at around 700mm below ground level to the rear of our property – less sometimes. This means crate soakaways would be useless. I would also urge the council to ensure the developer uses rainwater harvesting tanks, which would mean the water would be re-used in the home and disposed of in the sewerage system.

I am concerned that this development should only proceed with local input, or at least after discussion with the public which should include the ramblers association and Fakenham Parish council who's access to open spaces and general welfare are affected. If the wrong development goes ahead on this land, it is permanent. Carrying out post completion works and the litigation and complaints that may follow would be costly and time consuming and benefits no one.

Modifications requested

Appear at examination hearing session(s)?

* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Consultation Point Title	Holt
Consultation Point Number	12
Section of the Plan	12.0.10
ID	LPS658
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	<i>12.0.10 The Holt GP practice does not have capacity for the additional demand resulting from the cumulative development growth in the area. Any proposed development will likely have an impact on the NHS funding programme for the delivery of primary healthcare provision within this area. NHS England would therefore expect these impacts to be fully assessed and mitigated as part of any development proposal.</i> This does not meet the "Effective" test of soundness. Weybourne is in the Holt GP Practice catchment area, and development in Weybourne would therefore increase pressure on the Holt GP Practice. Likewise Briston, Melton Constable, Blakeney.
Modifications requested	If development is to occur in these villages, additional capacity will need to be added to the Holt GP practice.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

Consultation Point Title	Land North of Valley Lane
Consultation Point Number	Policy H17
Section of the Plan	Policy H17 Land North of Valley Lane
ID	LPS114
Response Date	19/02/2022 17:44:00
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	This site is greenfield, in/adjacent to the Holt and Glaven Valley Conservation areas and will negatively impact both these. The development will be quite visible on the approach to Holt from Dereham. At the moment the rurality of this corner of Holt is quite refreshing. The access will be quite tight onto a busy part of the Norwich Road.
Modifications requested	Either the density of housing needs to be greatly reduced or the housing put elsewhere. Boundary landscaping will not be sufficient mitigation.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land North of Valley Lane
Consultation Point Number	Policy H17
Section of the Plan	Policy H17 Land North of Valley Lane
ID	LPS138
Response Date	21/02/2022 15:49:00
Name	Mrs Gemma Harrison
Organisation	Holt Town Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes

Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Holt Town Council support the proposed site allocation off Valley Lane, as it helps meet the demand of houses needed in the town of Holt.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land North of Valley Lane
Consultation Point Number	Policy H17
Section of the Plan	Policy H17 Land North of Valley Lane
ID	LPS244
Response Date	24/02/2022 16:23:00
Name	Ms Iona Chamberlain
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	Regarding Holt proposed housing at land north of Valley Lane.12.1 (H17): 1. TRAFFIC: The access way for this proposed development is not suitable. The traffic would greatly increased and cause issues. 2. NATURE: The land itself is a wonderful natural buffer between the town and spout hills and many species of birds and mammals etc are seen. This needs to be conserved. 3. BEAUTY: It will have a negative impact on the ambience of this part of Holt as the view of the valley will be spoilt by local residents and many people who go there to look. It is wonderful to be able to be so close to the natural landscape in a town. 4. UNNECESSARY: There is no need to build here as there is plenty of availability locally elsewhere. 5. NEGATIVITY: It will devalue the houses that surround it and cause a great deal of upset.
Modifications requested	To make the proposal sound, it is to refuse permission to built on this land and remove it from the plan.
Appear at examination hearing session(s)?	No, I do not wish to participate in examination hearing session(s)

* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land North of Valley Lane
Consultation Point Number	Policy H17
Section of the Plan	Policy H17 Land North of Valley Lane
ID	LPS271
Response Date	28/02/2022 17:04:00
Name	Mrs Sally Lawford
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	
* Yes	
* No	
Has the duty to cooperate been met?	
* Yes	
* No	
Do you consider the plan to be Sound?	No
* Yes	
* No	
Reason(s) not Sound	It is not justified
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	The proposal is not justified as it is not an appropriate strategy. The site is a pleasant meadow falling within Holt Conservation Area and is adjacent to the County Wildlife Site of Spout Hills with all the attendant wildlife diversity.
Modifications requested	I believe the proposal is unacceptable because the biodiversity value of the site is too important to lose.
Appear at examination hearing session(s)?	No, I do not wish to participate in examination hearing session(s)
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land North of Valley Lane
Consultation Point Number	Policy H17
Section of the Plan	Policy H17 Land North of Valley Lane
ID	LPS270
Response Date	28/02/2022 16:59:00
Name	Mrs Sally Lawford
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	
* Yes	
* No	
Has the duty to cooperate been met?	

* Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	The proposal is not justified as it is not an appropriate strategy. The access for 27 dwellings from Pounds Close onto a very busy A148 would pose a real threat. There are already junctions and access points onto the main road between the A148 roundabout and main access into Holt High Street. This includes Valley Lane, Pounds Close, Methodist Church and junction at Kerridge Way serving Budgen's Supermarket and properties on Kerridge Way. There is also a busy pedestrian crossing. Often the traffic backs up from the roundabout to the main junction into Holt High Street.
Modifications requested	I believe the proposal is unacceptable because the access issue cannot be overcome.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land North of Valley Lane
Consultation Point Number	Policy H17
Section of the Plan	Policy H17 Land North of Valley Lane
ID	LPS509
Response Date	07/03/2022 22:04:17
Name	Mr Mike Jones
Organisation	Norfolk Wildlife Trust
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	The proposal is adjacent to Spout Common CWS, which already receives a significant amount of visitor pressure.
Modifications requested	To ensure that this allocation will not lead to deterioration of the CWS, the policy wording should be updated to make reference to the adjacent CWS, to ensure that any site design leaves a sufficient buffer between the site and the CWS to avoid indirect impacts from residential properties and for sufficient measures to be included in any planning consent to ensure that visitor pressure impacts on the CWS are mitigated for. Due to proximity to the CWS, we also recommend that the policy wording makes clear that any proposal here will need to be accompanied by a detailed ecological assessment.

Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land North of Valley Lane
Consultation Point Number	Policy H17
Section of the Plan	Policy H17 Land North of Valley Lane
ID	LPS416
Response Date	07/03/2022 13:49:00
Name	Mrs Helen Morris
Organisation	RCA Regeneration Ltd
Agent Name	Helen Morris
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	We are supportive of Policy H17 - Land North of Valley Lane, Holt for the proposed allocation of approximately 27 dwellings as it would assist in meeting the need for housing in this Small Growth Town. The site is ideally situated in relation to the town centre with no major constraints to development and is considered likely to be deliverable within the first 5 years.
Modifications requested	N/A
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	We wish to reserve the right to attend the hearing session specific to Holt, if possible.
Attachment(s)	
Consultation Point Title	Land North of Valley Lane
Consultation Point Number	Policy H17
Section of the Plan	Policy H17 Land North of Valley Lane
ID	LPS731
Response Date	28/02/2022 08:14:00
Name	Mrs Debbie Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	

* Yes	
* No	
Has the duty to cooperate been met?	
* Yes	
* No	
Do you consider the plan to be Sound?	No
* Yes	
* No	
Reason(s) not Sound	
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	<p>This site lies within the Holt Conservation Area and adjacent to the Glaven Valley Conservation Area. Two grade II listed buildings lie immediately to the north of the site. Hill House has an eighteenth century facade with earlier double pile core and is constructed from Brick and pantiles. The Methodist church was built in 1862 by Thomas Jekyll of Norwich. It is constructed of yellow brick and flint with red brick dressings and has a steeply-pitched plain-tile roof. Any development of the site therefore has the potential to affect these heritage assets and their settings.</p> <p>We welcome the preparation of a Heritage Impact Assessment in the Historic Environment Topic Paper. This provides robust evidence of the potential impact on the historic environment and suggests appropriate mitigation measures.</p> <p>The HIA sets out appropriate policy wording for inclusion in the Plan (see page 85).</p> <p>However, unfortunately this wording has not been included in the Plan. The policy needs amending to incorporate the wording from the HIA. We appreciate that criterion 1 of the policy does include some protection for the historic environment, but this falls short of the recommendations of the HIA.</p>
Modifications requested	<p>Replace criterion 1 with:</p> <p>Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area, including the Holt Conservation Area, Hill House, Methodist Church, both Grade II Listed Buildings. Development should include the following mitigation measures (as set out in further detail in the Heritage Impact Assessment):</p> <ul style="list-style-type: none"> - Seek to retain a view toward the Glaven Valley from Norwich Road - Retain and strengthen hedgerow on the eastern boundary of the site, particularly on the north eastern corner to mitigate potential impact upon Hill House and the Methodist Church. - Provide strong landscaping along the southern and northern boundaries of the site - A Heritage Statement is required to assess the archaeological importance of the site.
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land North of Valley Lane
Consultation Point Number	Policy H17
Section of the Plan	Policy H17 Land North of Valley Lane
ID	LPS697
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	

Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>Sound- Subject to project level HRA</p> <p>This policy supports residential developments which may result in an increase in recreational use of designated sites. In line with the plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and provide an appropriate Surface Water and/or Foul Sewage Drainage Strategy as part of the development proposal.</p> <p>This allocation is also located within or in in close proximity to the Norfolk Coast AONB. In support of Policy ENV1, due consideration should be taken to determine any adverse effects on the special qualities of the protected landscape. Priority habitats and species should also be considered to assess the impact of the development proposals on local wildlife, in line with paragraphs 175 and 176 of the NPPF.</p>
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Policy H20 Land at Heath Farm

Consultation Point Title	Land at Heath Farm
Consultation Point Number	Policy H20
Section of the Plan	Policy H20 Land at Heath Farm
ID	LPS142
Response Date	24/02/2022 09:28:00
Name	Miss Naomi Chamberlain
Organisation	Norfolk County Council - Highway Authority (Major & Estate Development)
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Policy H 20, point 1 refers to a new roundabout at the A148, this is an existing junction. Clarification is required as the Highway Authority would not wish to support an additional junction at the A148.
Modifications requested	The following revision is required to point 1 of policy H 20 'Access being delivered off Nightjar Road and existing A148 roundabout...'
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land at Heath Farm
Consultation Point Number	Policy H20
Section of the Plan	Policy H20 Land at Heath Farm
ID	LPS139
Response Date	21/02/2022 15:50:00
Name	Mrs Gemma Harrison
Organisation	Holt Town Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes

Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Holt Town Council support the proposed site allocation at Heath Farm, as it helps meet the demand of houses needed in the town of Holt.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land at Heath Farm
Consultation Point Number	Policy H20
Section of the Plan	Policy H20 Land at Heath Farm
ID	LPS333
Response Date	04/03/2022 14:21:03
Name	Mr Alastair & Andrew Brown
Organisation	North Norfolk Tomatoes
Agent Name	Jack Millar
Agent Organisation	Strutt & Parker
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	SEE ATTACHED FILE
Modifications requested	SEE ATTACHED FILE
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	My client owns land that is allocated in the local plan and it would therefore be appropriate to participate in the hearing sessions
Attachment(s)	2022 03 04 Heath Farm Regulation 19 Representation (Residential).docx.pdf
Consultation Point Title	Land at Heath Farm
Consultation Point Number	Policy H20
Section of the Plan	Policy H20 Land at Heath Farm
ID	LPS732
Response Date	28/02/2022 08:14:00
Name	Mrs Debbie

	Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>Whilst there are no designated heritage assets within the site, there are two grade II listed buildings to the south east of the site. Development has the potential to impact upon the setting of these listed buildings.</p> <p>We welcome the preparation of a Heritage Impact Assessment in the Historic Environment Topic Paper. This provides robust evidence of the potential impact on the historic environment and suggests appropriate mitigation measures.</p> <p>The HIA sets out appropriate policy wording for inclusion in the Plan (see page 91). However, unfortunately this wording has not been included in the Plan. The policy needs amending to incorporate the wording from the HIA.</p> <p>We appreciate that criterion 2 of the policy does include some protection for the historic environment, but this falls short of the recommendations of the HIA.</p> <p>In addition, the Key Development Considerations diagram on page 332 of the Historic Environment Paper should be included in the Plan. The diagram shows the heritage mitigation measures proposed for the site.</p>
Modifications requested	<p>Replace Criterion 2 with:</p> <p>Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area, including Heath Farm House and Barn North of Heath Farm House, both Grade II Listed buildings. Development should include the following mitigation measures (as set out in further detail in the Heritage Impact Assessment):</p> <ul style="list-style-type: none"> • Further landscaping to be provided along the north western boundary of the site • Landscaping along the southern boundary of the site • Low density and single storey development to the southern, northern and western parts of the site • Open space to be located within the south eastern part of the site and strong landscaping to be provided along the south eastern boundary of the site to provide a buffer between residential development and Heath Farm and Heath Farm Barn <p>Add heritage mitigation diagram from p 332 of HEP to Plan.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land at Heath Farm
Consultation Point Number	Policy H20
Section of the Plan	Policy H20 Land at Heath Farm
ID	LPS699

Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Sound – Subject to project level HRA This policy support developments which may result in an increase in recreational use of and urban effects on designated sites. We recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites and support the mitigation measures highlighted in the HRA. This allocation is also situated upslope of Norfolk Valley Fens SAC creating potential effects for the water flow, run-off and hydrology of the designated site. In line with the plan's HRA and this policy, Natural England agrees that an appropriate sustainable drainage strategy is needed and the project level HRA should also consider the hydrological impacts of these developments on this designated site.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Policy H27/1 Land at Heath Farm (Employment)

Consultation Point Title	Land at Heath Farm (Employment)
Consultation Point Number	Policy H27/1
Section of the Plan	Policy H27/1 Land at Heath Farm (Employment)
ID	LPS143
Response Date	23/02/2022 14:48:00
Name	Miss Naomi Chamberlain
Organisation	Norfolk County Council - Highway Authority (Major & Estate Development)
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Policy H27/1, point 2 refers to a new roundabout at the A148, this is an existing junction. Clarification is required as the Highway Authority would not wish to support an additional junction at the A148.
Modifications requested	The following revision is required ' <i>Access being delivered off Nightjar Road and existing A148 roundabout and no access from Hempstead Road.</i>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land at Heath Farm (Employment)
Consultation Point Number	Policy H27/1
Section of the Plan	Policy H27/1 Land at Heath Farm (Employment)
ID	LPS335
Response Date	04/03/2022 14:28:00
Name	Mr Alastair & Andrew Brown
Organisation	North Norfolk Tomatoes
Agent Name	Jack Millar
Agent Organisation	Strutt & Parker
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound?	No

* Yes	
* No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	SEE ATTACHED FILE
Modifications requested	SEE ATTACHED FILE
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	My client owns land that is allocated in the local plan and it would therefore be appropriate to participate in the hearing sessions
Attachment(s)	2022 03 04 Heath Farm Regulation 19 Representation (Commercial).docx.pdf
Consultation Point Title	Land at Heath Farm (Employment)
Consultation Point Number	Policy H27/1
Section of the Plan	Policy H27/1 Land at Heath Farm (Employment)
ID	LPS510
Response Date	07/03/2022 22:18:00
Name	Mr Mike Jones
Organisation	Norfolk Wildlife Trust
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Section 6.19 of the HRA notes that the potential for hydrological impacts on the Norfolk Valley Fens SAC remains from this allocation. We are concerned that an adverse effect on the SAC has been ruled out in the HRA through deferral to project level HRA.
Modifications requested	Whilst a project level HRA <u>may</u> be able to demonstrate avoidance of adverse effects at the planning application stage, insufficient evidence has been provided at this stage to definitively rule out adverse effects and so the inclusion of this employment allocation. This means there remains a risk to the delivery of the plan if project level HRAs are unable to demonstrate that adverse effects on the SAC will be avoided.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land at Heath Farm (Employment)
Consultation Point Number	Policy H27/1

Section of the Plan	Policy H27/1 Land at Heath Farm (Employment)
ID	LPS733
Response Date	28/02/2022 08:14:00
Name	Mrs Debbie Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>Whilst there are no designated heritage assets within the site, the site lies immediately adjacent to the boundary of the Glaven Valley Conservation Area. There are two grade II listed buildings to the north of the site at Heath Farm. Development of the site has the potential to impact on the settings of these heritage assets. As an employment site, the potential impact is arguably greater than for a residential site.</p> <p>We welcome the preparation of an Heritage Impact Assessment in the Historic Environment Topic Paper. This provides robust evidence of the potential impact on the historic environment and suggests appropriate mitigation measures.</p> <p>The HIA sets out appropriate policy wording for inclusion in the Plan (see page 91).</p> <p>However, unfortunately this wording has not been included in the Plan. The policy needs amending to incorporate the wording from the HIA.</p> <p>We appreciate that criterion 1 of the policy does include some protection for the historic environment, but this falls short of the recommendations of the HIA.</p>
Modifications requested	<p>Replace criterion 1 with:</p> <p>Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area, including Heath Farm House and Barn North of Heath Farm House, both Grade II listed buildings and the Glaven Valley Conservation Area. Development should include the following mitigation measures (as set out in further detail in the Historic Impact Assessment):</p> <ul style="list-style-type: none"> • Retain and strengthen landscaping along the southern boundary of the site • Retain and strengthen landscaping along the eastern boundary of the site • Retain prominent trees to the west • Provide a strong landscaping buffer on the northern boundary of the site • Smaller scale development to the south and south eastern parts of the site
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land at Heath Farm (Employment)
Consultation Point Number	Policy H27/1

Section of the Plan	Policy H27/1 Land at Heath Farm (Employment)
ID	LPS700
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>Sound – Subject to project level HRA</p> <p>This policy support developments which may result in an increase in recreational use of and urban effects on designated sites. We recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites and support the mitigation measures highlighted in the HRA.</p> <p>This allocation is also situated upslope of Norfolk Valley Fens SAC creating potential effects for the water flow, run-off and hydrology of the designated site. In line with the plan's HRA and this policy, Natural England agrees that an appropriate sustainable drainage strategy is needed and the project level HRA should also consider the hydrological impacts of these developments on this designated site.</p>
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

13 Hoveton

Consultation Point Title	Hoveton
Consultation Point Number	13
Section of the Plan	13 Hoveton
ID	LPS34
Response Date	27/01/2022 07:08:03
Name	Mrs Kerry Walker
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	No
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified
Explanation	<p>Hoveton is identified as a Small Growth Town in the settlement hierarchy notwithstanding it is a village'</p> <p>It is my opinion when it comes to services for residents NNDC use data and weight policies in favour of a village yet when it comes to commercial growth Hoveton is lumped with Wroxham to make it a 'service centre' with town centre policies. Moreover, given that NNDC was the first to declare a climate emergency - modelling shows that Hoveton's service centre is predicted to be underwater in 8 years time. The Local Plan for Hoveton is neither sound and the duty to co-operate has not factored in some major obstacles not only with climate change but with traffic, bridge longevity and air pollution.</p> <p>Examples:</p> <p>NNDC has blurred the future development due to its periphery border location. NNDC's Local Plan Workshop Feed Back Summary is titled '(Wroxham & Hoveton) and states 'Hoveton and Wroxham are two villages separated by the River Bure...it is the aim of the Council to plan for growth collaboratively with both local communities and across the local planning authorities so as to plan in a 'whole settlement way'. Whilst a silo mentality towards the development of Hoveton should not exclude boundary authorities - there has been a cherry picking of issues that NNDC has used to form Hoveton's future. It has consulted with groups/parish councils and BA whose needs afford different and often conflicting agendas. For example, in respect of housing development. Wroxham has an adopted Neighbourhood plan where the parish council is clear on the type of houses the parish wish to develop that meet the needs of the community. This weighted towards the elderly. Hoveton's demographic is completely different to Wroxham's and the needs differ greatly. Further Wroxham has worked very hard with Broadland on its site allocations for Wroxham and housing targets have been agreed based on the real obstacles to growth (traffic, air pollution bridge limitations). It is the case that Wroxham had already secured its future growth yet it's parish was having a say on the future development of Hoveton in workshops run by NNDC. Why is this important? The duty to co-operate between councils rightly takes an overall view of both villages as a settlement whole - yet - the amount of housing proposed for Hoveton in this Local Plan is disproportionate to restricted development of Wroxham's. NNDC has not taken into consideration the restrictions of the bridge, the increasing traffic flows and also the measurement of air pollution. In the specific case of air pollution reports used to support the Local Plan combine Wroxham & Hoveton for statistical purposes yet the statistics for air pollution do not measure the impact of air pollution at</p>

	<p>the other side of the Bridge. Thereby the impact of air pollution does not factor in the air pollution created by Wroxham vehicles queuing on the bridge and idling at the traffic lights at the Wroxham side. It is maintained that there is a desire to protect Wroxham's 'character and demographic' at the expense of Hoveton's population and quality of life.</p> <p>Hoveton as a service centre. This is historically an issue as the service centre is dominated by Roys. Many policies are weighted in favour of supporting and expanding the service of commercial sector and in particular Roys. For example the commercial reports used to support the Local Plan combine Wroxham & Hoveton as one settlement to measure the loss of commercial shoppers into Norwich.</p> <p>In respect to the development of the Service Centre its self. The Local Plan deems that future development in Hoveton is limited by its own parameters and highlights that expansion of any commercial growth should be on existing car parks. This policy is a limit to growth. Moreover, all statistical modelling shows that within 8 years Hoveton's Service Centre will be under water. This Local Plan has done nothing to mitigate that factor and has not provided for alternative development land for an alternative service centre.</p> <p>Public Open Space - Hoveton has Riverside and Pocket Parks. Leased to the BA by Roys. Hoveton has Granary Staithe on the River Bure. As above no policy has been put in place to mitigate the loss of public open space to rising sea levels. As it stands Riverside Park is returning to marsh and the parks 'performance circle' and some benches being underwater for 9 months of the year.</p> <p>There has clearly been no cross authority planning to mitigate for Climate Change and the statistical modelling of rising river levels that are predicted to flood major points in Hoveton.</p> <p>Finally the Wroxham Bridge. This bridge has a life span and is not fit for purpose in the 21st Century. The footbridge is also an issue and it is my understanding that the money for its replacement has not been possible. The aging infrastructure that services Hoveton Wroxham (and Stalham) has not been taken into consideration in any of the development planning. Moreover, with rising river levels the future of Wroxham Bridge as a connection between North Norfolk and Broadland villages has been ignored in this plan.</p> <p>NNDC's Local Plan for Hoveton and NN in general is not fit for purpose. There has been no consideration of the very serious issues facing Hoveton and the North North District.</p>
<p>Modifications requested</p>	<p>NNDC must use flood modelling and incorporate into future development plans for commercial centre.</p> <p>NNDC must use traffic flows, air pollution and bridge life span to support a whole settlement approach. Currently the plan for Hoveton does not measure from a whole settlement position,</p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>Justification for appearing at hearing</p>	<p>I dont - you asked - I will attend if necessary.</p>
<p>Attachment(s)</p>	

Consultation Point Title	Land East of Tunstead Road
Consultation Point Number	Policy HV01/B
Section of the Plan	Policy HV01/B Land East of Tunstead Road
ID	LPS264
Response Date	28/02/2022 13:13:00
Name	Mr Geoff Cook
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared It is not consistent with national policy
Explanation	SEE ATTACHED FILE The allocation of HV01/B is unsound because: 1. The brownfield site on Station Road has not been included. 2. The potential greenfield sites around the village have not been fully assessed because HV01 had already been chosen 3. No account has been taken of the developments at Church Farm or Tilia Park
Modifications requested	SEE ATTACHED FILE The number of houses required needs to be accurate - is it 120 including the care home or 120 plus the care home and if so, how many in the care home. Account needs to be taken of the recent developments at Church Farm (25) and Tilia Park (28) The brownfield site off Station Road needs to be assessed
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	Local Plan comments.pdf
Consultation Point Title	Land East of Tunstead Road
Consultation Point Number	Policy HV01/B
Section of the Plan	Policy HV01/B Land East of Tunstead Road
ID	LPS273
Response Date	28/02/2022 21:23:29
Name	Mr Benjamin Bethell
Organisation	Hoveton Parish Council
Agent Name	
Agent Organisation	

<p>Do you consider the plan to be Legally Compliant?</p> <p>* Yes</p> <p>* No</p>	No
<p>Has the duty to cooperate been met?</p> <p>* Yes</p> <p>* No</p>	No
<p>Do you consider the plan to be Sound?</p> <p>* Yes</p> <p>* No</p>	No
<p>Reason(s) not Sound</p> <p>* It is not positively prepared</p> <p>* It is not effective</p> <p>* It is not justified</p> <p>* It is not consistent with national policy</p>	It is not justified; It is not consistent with national policy
<p>Explanation</p>	<p>Soundness of Policy HV 01 /B at page 195:</p> <p>1 The proposal to allocate high quality greenfield farming land East of Tunstead Road for 120 dwellings is flawed and unsound, and requires further consideration for a number of reasons:</p> <ul style="list-style-type: none"> • 120 units is mentioned, which is over development in relation to this particular location in Hoveton, but actually proposes this number plus elderly housing of 'at least' 60 units. This means a density much higher than exists anywhere else along the Tunstead Road in Hoveton. • This additional number of units for Hoveton does not seemingly reflect the impact of high numbers of units already being delivered/ agreed for the Churchfield (25 units) and Tilia Park (28 units) developments, the latter also off the Tunstead Road • The process for identifying sites still appears to have not included an adequate assessment of making use of a brown field site locally, notably the vacant site now running from the Kings Head Assembly Rooms as far as the former Massingham's butchers shop site, which would easily take a development of 67 units (calculated as 120 less 53 units), or more. • There is a now an increased concern that the Local Plan should be more focused on tackling the exceptionally high second and holiday home numbers locally. <p>2. Paragraph 11 – should be amended to replace the words delivery of '<i>not less than 60 units of elderly accommodation</i>' with the words '<i>no more than 60 units of elderly accommodation</i>', which should be combined with a statement indicating the area within the site which is to be allocated for those elderly person residential units. There also needs to be clarity over whether this is going to be a hostel or individual units, the latter of which might each house multiple residents. This will have an impact on infrastructure requirements.</p> <p>3. Paragraph 7 – refers to the Wroxham and Hoveton Network Improvement Strategy Action Plan being used to address transport constraints. Both parish councils locally, as well as residents in both communities, have been highly critical of this document, which was poorly commissioned, poorly funded, badly undertaken and, as a result, contains a flawed analysis and weak recommendations. This document really does not provide a basis for addressing the particular transport concerns locally, for example involving permanent congestion on the Wroxham Road. More details are available on request.</p> <p>Sustainability Appraisal Report</p> <p>The Sustainability Appraisal Report is not satisfactory in the following respects in relation to Hoveton:</p> <p>The report concludes that the biodiversity impact is uncertain for Hoveton. The SAR has not adequately addressed the Aichi Targets included in the "Strategic Plan for Biodiversity 2011-2020" which the UK signed up to in Japan in October 2010. Of the 20 targets which were supposed to have been addressed by 2020, the current version of the Local Plan fails to address 8, or 40% of them.</p> <p>The "Biodiversity 2020: A strategy for England's wildlife and ecosystem services" document produced by DEFRA includes a foreword by The Rt Hon. Caroline Spelman MP, Secretary of State for Environment, Food and Rural Affairs in which she states "<i>our ambition is to move progressively from a position of net biodiversity loss to net gain</i>". Clearly, when the impact is assessed as 'uncertain', it is probably not achieving a "net gain".</p> <p>Of particular concern, the proposed site allocation for Hoveton both loses high quality agricultural land and harms the landscape. The green space allocated in Hoveton is used by 2 species of Bat, 2</p>

species of Deer, Hare, Fox, 22 species of birds and butterflies – an analysis of protected/ unprotected species at this location is available on request.

The Habitat Regulation Assessment (HRA)

The Habitat Regulation Assessment (HRA), produced by Footprint Ecology for NNDC, assesses the impact of the Local Plan on sites for biodiversity. However, this contains errors for the allocated land in Hoveton and therefore cannot be considered “sound” in that:

- 1 Table 3 on page 60 shows the number of houses within the “relevant zones of influence”. This table shows 120 houses for the development site – this therefore ignores the large number of dwellings being proposed for the elderly, of ‘at least’ 60 units.
- 2 The HRA proposal for Hoveton has also ignores the existence of local developments currently being built at Church Farm and also at Tilia Park, the latter also off the Tunstead Road.
- 3 The report highlights recreational and hydrological risks as a consequence of the proposed Hoveton allocation, but the impact would actually be much greater as the number of units is much greater than 120, in fact being ‘at least’ 60 units more!
- 4 The report identifies Hoveton as a small town, rather than a village, which is incorrect as a classification
- 5 The report contains inconsistent distances to the Broads
- 6 The report chooses to separate Wroxham and Hoveton rather than join them for consideration of habitat aspects, which the HRA process has done for the other areas for development covered in the Local Plan.
- 7 The significant Air Quality issues on the A1151 either side of the Wroxham Bridge, where traffic is usually stationary, have not been mentioned at all, although air quality is being considered for other areas in the Local Plan, where this issue is going to be of lesser significance.
- 8 Water Recycling Centre capacity issues have been mentioned, but the comments about these simply needing to be resolved before any development takes place greatly underplay the immense problems with infrastructure locally, and do really need to be better sign posted for Hoveton.

Modifications requested	Remove the policy and allocation HV01/B
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To ensure that the plan is subject to proper scrutiny, because at this point in time there are serious flaws in what is being proposed.
Attachment(s)	
Consultation Point Title	Land East of Tunstead Road
Consultation Point Number	Policy HV01/B
Section of the Plan	Policy HV01/B Land East of Tunstead Road
ID	LPS615
Response Date	07/03/2022 09:36:00
Name	Cllr Nigel Dixon
Organisation	Ward Member for Hoveton & Tunstead (NNDC)
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound	

<ul style="list-style-type: none"> * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy 	
Explanation	In terms of the Hoveton HV/01/B site proposal, the allocation is unsound in the following respects and thus should be modified to include or enhance these requirements:
Modifications requested	<ul style="list-style-type: none"> • The development must deliver a new strategic solution to the current persistent overwhelming of the existing foul water network in Hoveton and the regular incidents of raw sewerage flooding in several parts of Hoveton caused by inundation by surface/river water ingress and routing all foul water through the Hoveton village centre. • The development must include a mini roundabout junction on Tunstead Rd aligning with the entrance to Two Saints Close to create safer access to both estates and to help moderate excessive speed of traffic leaving and entering Hoveton. • The density of the development must be in keeping with the majority of Hoveton and include substantial areas for wildlife habitat, conservation and biodiversity gain. This includes minimising the destruction of the highly valued and habitat rich Hawthorne hedge along Tunstead Rd and replanting the lost section along the north side of the site joining up with the roadside hedge. • The development must deliver traffic solutions to improve flow capacity for vehicles, cyclists and pedestrians as well as air quality in the village centres of Hoveton and Wroxham. This includes setting aside the heavily discredited and abortive Wroxham & Hoveton Network Improvement Strategy Action Plan and starting afresh with an open evidence based strategic approach with full community involvement. • The development must ensure greater capacity and reduced waiting times at Hoveton and Wroxham Medical Centre and access to local NHS Dentistry. <p>It's acknowledged that huge efforts have been made to comply with the complex and onerous demands of central government while trying to protect the special character of North Norfolk and meet the rapidly rising need to conserve and rebuild biodiversity as well as the climate change agenda. The above, proportionate and complementary, modifications are sought to fill obvious gaps and redress imbalances at both strategic and local grass roots levels to ensure the Local Plan is sound and fit for purpose over the next 15+ years. If it's not possible to incorporate these modifications, then please treat these representations as objections.</p>
Appear at examination hearing session(s)?	
<ul style="list-style-type: none"> * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s) 	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land East of Tunstead Road
Consultation Point Number	Policy HV01/B
Section of the Plan	Policy HV01/B Land East of Tunstead Road
ID	LPS543
Response Date	07/03/2022 17:00:00
Name	Mr Julian Wells
Organisation	FW Properties Ltd
Agent Name	Mr Alastair Curran
Agent Organisation	Planning Places Ltd
Do you consider the plan to be Legally Compliant?	Yes
<ul style="list-style-type: none"> * Yes * No 	
Has the duty to cooperate been met?	Yes

* Yes * No	
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>The allocation of HV01/B: Land East of Tunstead Road, is supported as the allocation is considered both sound and legally compliant. The site is in a highly sustainable location, being directly adjacent to the Settlement of Hoveton (a small growth town in the settlement hierarchy). The site is within walking distance of a significant number of local services and facilities including the railway station, as well as being located adjacent to a new cycle route further facilitating access to key services and local employment opportunities.</p> <p>There are great connections via alternative modes (e.g. trains, buses, and taxis) to Norwich and Great Yarmouth, and other large growth towns, such as Cromer and North Walsham, inside the District. Each of these settlements provides a wide array of services, facilities, and employment opportunities supplementing those provided within Hoveton.</p> <p>The development of site HV01/B will see a number of public benefits, including but not limited to, the delivery of the planned link road between Tunstead and Stalham Roads, new affordable houses, as well as major off-site highways and drainage improvement works.</p> <p>Given the site adheres to the proposed spatial strategy, and is in a highly sustainable location, it is considered the allocation is consistent with national policy.</p> <p>HV01/B has been positively prepared, in that it actively provides dwellings to aid the growing local population of Hoveton, and the neighbouring area of Wroxham.</p> <p>The allocation of HV01/B is justified, as other sites have been considered as part of the preferred allocation process, however HV01/B has the benefit of being able to actively secure multiple public benefits, including the delivery of a key link road which other sites would not be able to secure.</p> <p>HV01/B is effective as it is entirely within the ownership of one landowner, with an option agreement already secured by a local reputable developer, FW Properties Ltd, who are able to make an immediate start on site and see delivery within the first few years of adoption of the Local Plan.</p> <p>The draft Local Plan is included with the Local Development Scheme, and NNDC (North Norfolk District Council) have published updated timelines regarding the development of the Plan. Equally, the draft Local Plan has been consulted in line with the Council's Statement of Community Involvement and have produced a Sustainability Appraisal which has considered HV01/B. As such, the draft Local Plan is in accordance with the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended and is considered to be Legally Compliant.</p> <p>The Council, through the Norfolk Strategic Planning Member Forum has worked alongside the neighbouring Council's in accordance with Section 33A of the Planning and Compulsory Purchase Act. As such, it is considered that the Duty to Cooperate has been adhered to.</p>
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	It would be beneficial to speak, as acting on behalf of the landowner and developer, we can assist the inspector in better understanding the allocation, the local situation/politics, as well as what is deliverable, in terms of quantum of development and timescales. Equally we are best placed to answer any queries regarding development on this site or its planning history.
Attachment(s)	

Consultation Point Title	Land East of Tunstead Road
Consultation Point Number	Policy HV01/B
Section of the Plan	Policy HV01/B Land East of Tunstead Road
ID	LPS545
Response Date	07/03/2022 17:00:00
Name	Mr Julian Wells
Organisation	FW Properties Ltd
Agent Name	Mr Alastair Curran
Agent Organisation	Planning Places Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	<p>The associated plan (plan HOVET-IWD-XX-XX-DR-A-1010 P03) shows the proposed allocation (HV01/B) extending to the existing field boundary. The current draft allocation would result in a strip of agricultural land too small to farm, that could ultimately be abandoned. This would likely result in a proposal with negative design ramifications and therefore is arguably not consistent with national policy, specifically paragraphs 124 and 130 of the NPPF.</p> <p>The larger site utilises part of this surplus land for additional Public Open Space and landscaping - this will be managed and maintained for public amenity as well as for biodiversity and landscape benefits. This will result in a better landscaped buffer as per the draft policy requirement, instead of an awkward strip of unused agricultural land, and a contrived landscaped buffer that runs along the northern edge of the draft allocation, but not along the adjacent Brook Park development.</p> <p>In addition, the larger site will also facilitate a better-quality development offering a wider range of house types and bungalows in larger and better laid out plots. The overall density of the development will therefore be reduced and be more in line with the rest of the village, with dwellings benefitting from usable gardens.</p> <p>This land, and all the land to the north and east of the site is within the same ownership, and an option agreement has been secured by FW Properties for both the site and our proposed site extension. This means the land is available and deliverable, and following the Local Plan adoption, an application would be submitted. FW Properties' aim is to start on site with the first phase of works during the first year following the adoption of the plan. As such, the allocation of the larger site would be effective, but also more consistent with national policy whereas the decision to reduce the quantum of development makes the plan unsound.</p>
Modifications requested	It is considered that the original quantum of development be reinstated, alongside the small area of land to the north of the site be included in the allocation. This would ensure the allocation is not only sound, but can deliver substantial public benefits quickly for the existing residents of Hoveton. Furthermore, wording regarding potential solutions to the foul drainage issue could also be incorporated into the allocation policy text, securing a more sound strategy.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s)	Yes, I wish to participate in hearing session(s)

* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	<p>It would be beneficial to speak, as acting on behalf of the landowner and developer, we can assist the inspector in better understanding the allocation, the local situation/politics, as well as what is deliverable, in terms of quantum of development and timescales. Equally we are best placed to answer any queries regarding development on this site or its planning history.</p> <p>Furthermore, to verbalise the benefits of the larger allocation, and explain in detail why this is necessary. Equally we can discuss in depths what benefits the larger allocation would bring to local people alongside the solutions regarding the highways and drainage issues.</p>
Attachment(s)	HOVET-IWD-XX-XX-DR-A-1010 - Proposed Site Layout Plan - P03.pdf (1)
Consultation Point Title	Land East of Tunstead Road
Consultation Point Number	Policy HV01/B
Section of the Plan	Policy HV01/B Land East of Tunstead Road
ID	LPS547
Response Date	07/03/2022 17:00:00
Name	Mr Julian Wells
Organisation	FW Properties Ltd
Agent Name	Mr Alastair Curran
Agent Organisation	Planning Places Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified; It is not consistent with national policy
Explanation	<p>The allocation of land HV01/B is consistent with national policy, as the site has the potential to provide substantial net biodiversity gains regarding the established ecological networks on site, in line with paragraph 174 of the NPPF.</p> <p>Proposing planting adjacent to existing ecological networks would expand and enhance the existing networks. Networks comprised of both young and established habitats create a multifaceted ecosystem, which provides significant ecological benefits, such as increased species richness and abundance.</p> <p>The introduction of new native and naturalised plant species would provide a net biodiversity gain, creating more resilient populations and communities within the existing ecosystem, whilst providing new nesting and foraging habitats for local wildlife. Increasing biodiversity and species richness in this manner would enhance the resilience and coherence of the ecological network, widely beneficial for extant and new populations and communities. This is in accordance with paragraphs 174 and 179 of the NPPF.</p> <p>The site is currently of little environmental value, due to its current agricultural use and therefore any potential valuable habitats are located along the perimeters. With a larger allocation there would be greater opportunity to expand the extant ecological networks along the perimeter of the allocation site and agricultural field boundaries. Combining existing and new networks, into one larger, coherent network, with greater biodiversity potential, would provide habitats for a greater number of local priority species. This would provide great</p>

	<p>ecological and biodiversity benefits and be consistent with Section 15 of the NPPF and other relevant ecological legislation.</p> <p>The allocation of the site or the allocation of the larger site (please see plan HOVET-IWD-XX-XX-DR-A-1010 P03) would provide extensive, valuable ecological gains, including easily deliverable and effective ecological gains, and as such this Local Plan allocation is justified and sound.</p>
Modifications requested	<p>It is considered that the original quantum of development be reinstated, alongside the small area of land to the north of the site be included in the allocation. Furthermore, wording regarding potential solutions to the foul drainage issue could also be incorporated into the allocation policy text. Furthermore, we could re-word the landscaping texts to incorporate our proposed landscaping strategy, ensuring the buffer and the wider sites delivers the best quality biodiversity enhancements and contributes to a meaningful green infrastructure corridor.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	<p>It would be beneficial to speak, as acting on behalf of the landowner and developer, we can assist the inspector in better understanding the allocation, the local situation/politics, as well as what is deliverable, in terms of quantum of development and timescales. Equally we are best placed to answer any queries regarding development on this site or its planning history.</p> <p>Furthermore, to verbalise the benefits of the larger allocation, and explain in detail why this is necessary. Equally we can discuss in depths what benefits the larger allocation would bring to local people alongside the solutions regarding the highways and drainage issues and what additional ecological and biodiversity benefits the proposal will bring in comparison to the existing agricultural land.</p>
Attachment(s)	HOVET-IWD-XX-XX-DR-A-1010 - Proposed Site Layout Plan - P03.pdf (1)
Consultation Point Title	Land East of Tunstead Road
Consultation Point Number	Policy HV01/B
Section of the Plan	Policy HV01/B Land East of Tunstead Road
ID	LPS544
Response Date	07/03/2022 17:00:00
Name	Mr Julian Wells
Organisation	FW Properties Ltd
Agent Name	Mr Alastair Curran
Agent Organisation	Planning Places Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified
Explanation	The allocation of the site at Hoveton (HV01/B) is a sound decision given the sustainability of the location. However, in order to address the key issues as set out below, it would benefit from being increased from 6.4 hectares to 10.8 hectares as per plan

HOVET-IWD-XX-XX-DR-A-1010 P03, this would aid in making the allocation **more effective** and the Plan sound.

Following discussions with Anglian Water in relation to the current foul drainage issues affecting this part of Hoveton, we have devised a potential solution to these problems which can be delivered as part of the proposed allocation. The proposed mitigation measures involve running underground pipes to the north of the existing Brooke Park (the recent Persimmon development to the east of HV01/B) and along the north of the current HV01/B allocation (within the land we wish to use as a landscape buffer) to take all foul water from HV01/B and Brooke Park (Persimmon's development) directly to the Belaugh Water Recycling Centre where there is capacity. This route is shown as option 3 in blue on the attached Plan from Anglian Water.

This proposed allocation (plan HOVET-IWD-XX-XX-DR-A-1010 P03) will remove the foul drainage from 120 households from the existing drainage network in Hoveton which currently has major capacity issues during heavy rainfall periods. During heavy rain periods, foul water floods existing properties, in particular in Grange Close to the east of Stalham Road. By Removing the drainage from Brook Park, and our allocation, we will safely reduce pressure and usage of the existing network.

Our drainage works also include upgrades and improvements to the existing pumping station at Brook Park, which has not been adopted by Anglian Water due to it being completed to an unsatisfactory standard, or so we have been told.

Our solution goes above and beyond the requirements of the site allocation policy, and results in significantly higher infrastructure costs (i.e. laying approximately 2,000 metres of pipes including under an operational railway line) resulting in an approximate additional cost of £600,000. This proposal will ensure that our site has no impact on the existing foul drainage system, and actively improves the existing situation.

Furthermore, FW Properties Ltd and Planning Places Ltd have been in discussions with Norfolk County Council Highways and North Norfolk District Council regarding existing traffic issues within both Hoveton and Wroxham. Currently an awkward and poorly arranged double roundabout connecting four junctions escalates congestion within the centre of the two settlements. As an additional public benefit from the scheme, we propose remedying this issue by replacing the B1354 and Horning Road junctions with the Stalham Road junction, with a four-way traffic light system. This will be achieved through a commuted sum to County Council Highways which we have currently costed at approximately £600,000.

To provide infrastructure improvement works, above and beyond the requirements of the policy, but necessary for the future proofing of the two settlements, we require the original quantum of development of 150 dwellings. As can be seen by the proposed master plan, increasing the site boundary would enable a high-quality layout which is not as dense as the adjacent site, with an appropriate variety of house types and bungalows. The scheme will also include a high-quality elderly care facility, and a much-improved landscaped buffer (which has been subject to a LVIA: Land East of Tunstead Road Landscape Appraisal by Wynne-Williams Associates) including a tree planting strip along the Northern boundary. This revised scheme lay out, which includes some additional land immediately to the north (within the same landowners' control), continues the site up to the natural field boundary. This would result in the landscaped buffer not abruptly ending at the hard edge of the existing Brooke Park which has been developed to the very edge of the site (and would result in the existing houses being located adjacent and north of the urban boundary of HV01/B). This would enable all the agricultural field to be used, rather than leaving an unusable strip of land, too small and contrived to farm economically.

The infrastructure improvements required would not be considered deliverable without reverting back to the original 150 dwelling proposal.

Whilst the greater variety of dwellings, the lower density proposal, the slightly larger plots with better amenity, and the access to better quality public open spaces will all improve sale values to subsidise the necessary infrastructure costs. Ultimately, enlarging the allocation will see the guaranteed delivery of significant public benefits, alongside a better-quality development resulting in a sound allocation, that is **effective, justified and positively prepared**.

Modifications requested

It is considered that the original quantum of development be reinstated, alongside the small area of land to the north of the site be included in the allocation. Furthermore, wording regarding potential solutions to

	the foul drainage issue could also be incorporated into the allocation policy text.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	<p>It would be beneficial to speak, as acting on behalf of the landowner and developer, we can assist the inspector in better understanding the allocation, the local situation/politics, as well as what is deliverable, in terms of quantum of development and timescales. Equally we are best placed to answer any queries regarding development on this site or its planning history.</p> <p>Furthermore, to verbalise the benefits of the larger allocation, and explain in detail why this is necessary. Equally we can discuss in depths what benefits the larger allocation would bring to local people alongside the solutions regarding the highways and drainage issues.</p>
Attachment(s)	HOVET-IWD-XX-XX-DR-A-1010 - Proposed Site Layout Plan - P03.pdf (1) 2177-WWA-XX-XX-RP-L-0600_Land East of Tunstead Road Landscape Appraisal PL01.pdf (1)
Consultation Point Title	Land East of Tunstead Road
Consultation Point Number	Policy HV01/B
Section of the Plan	Policy HV01/B Land East of Tunstead Road
ID	LPS546
Response Date	07/03/2022 17:00:00
Name	Mr Julian Wells
Organisation	FW Properties Ltd
Agent Name	Mr Alastair Curran
Agent Organisation	Planning Places Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	<p>To reduce the number of units the site is expected to deliver in response to the NPPF requirements for increased green infrastructure and compliance with the National Design Guide is not justified.</p> <p>The approach is not sound given the highly sustainable location of the site; Hoveton being a designated small growth town, suitable for expansion. Given the original draft allocation, which was based off a strategy aimed at meeting the minimum housing needs. Reducing the size of the allocation, amongst other allocations in the plan, is detrimental to the delivery of the districts identified need. Equally, it encourages windfall development to make up for shortfalls, which is counterproductive in a plan led system. Instead, given that additional land is available, the most NPPF compliant approach would be to enable the large site, rather than dispersing the additional units to other less sustainable locations.</p>
Modifications requested	It is considered that the original quantum of development be reinstated, alongside the small area of land to the north of the site be included in the allocation. Furthermore, wording regarding potential solutions to

	the foul drainage issue could also be incorporated into the allocation policy text.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	<p>It would be beneficial to speak, as acting on behalf of the landowner and developer, we can assist the inspector in better understanding the allocation, the local situation/politics, as well as what is deliverable, in terms of quantum of development and timescales. Equally we are best placed to answer any queries regarding development on this site or its planning history.</p> <p>Furthermore, to verbalise the benefits of the larger allocation, and explain in detail why this is necessary. Equally we can discuss in depths what benefits the larger allocation would bring to local people alongside the solutions regarding the highways and drainage issues.</p> <p>As additional land is available, the most NPPF compliant approach would be to enable the large site, rather than dispersing the additional units to other less sustainable locations, and to help explore how this can be achieved as a minor amendment.</p>
Attachment(s)	HOVET-IWD-XX-XX-DR-A-1010 - Proposed Site Layout Plan - P03.pdf (1)
Consultation Point Title	Land East of Tunstead Road
Consultation Point Number	Policy HV01/B
Section of the Plan	Policy HV01/B Land East of Tunstead Road
ID	LPS734
Response Date	28/02/2022 08:14:00
Name	Mrs Debbie Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>There are no designated heritage assets on the site. The grade II* listed Church of St Peter and grade II listed ice house are located to the north east of the site but these are at sufficient distance from the site, and in the case of the ice house, in a well wooded location.</p> <p>We welcome the preparation of a Heritage Impact Assessment in the Historic Environment Topic Paper. This provides robust evidence of the potential impact on the historic environment and suggests appropriate mitigation measures.</p> <p>The HIA sets out appropriate policy wording for inclusion in the Plan (see page 91).</p> <p>However, unfortunately this wording has not been included in the Plan. The policy needs amending to incorporate the wording from the HIA.</p> <p>We appreciate that criterion 1 of the policy does include some protection for the historic environment, but this falls short of the recommendations of the HIA.</p>
Modifications requested	Replace criterion 1 to read:

	Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area, including Wroxham Bridge and the Grade II * Listed Church of St. Peter. Development should include the following mitigation measures (as set out in further detail in the Heritage Impact Assessment): <ul style="list-style-type: none"> • Retain and enhance landscaping on the northern and southern boundaries of the site • Retain strong landscaping on the western boundary of the site • Lower density, single storey dwellings on the northern part of the site
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land East of Tunstead Road
Consultation Point Number	Policy HV01/B
Section of the Plan	Policy HV01/B Land East of Tunstead Road
ID	LPS701
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Sound - Subject to project level HRA where appropriate This policy supports a development that will feed into Hoveton WRC and ultimately discharge into the River Bure (Broads SAC, Broadland SPA and Ramsar). Due to the surface water ingress concerns highlighted in the plan's HRA, we agree that a site-specific Water Catchment and Foul Water Drainage Strategy, as well as the enhancement of sewage infrastructure to deal with such concerns, should be undertaken prior to the development proposal proceeding. Furthermore, an appropriate assessment and project level HRA should also take place to determine no likely significant hydrological effects of the development on the protected sites.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Consultation Point Title	North Walsham
Consultation Point Number	14
Section of the Plan	14.0.10
ID	LPS71
Response Date	12/02/2022 13:51:03
Name	Mr Bill Musson
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not consistent with national policy
Explanation	<p>Paragraph 14.0.10 acknowledges challenges for heavy goods vehicles travelling through the town and force the traffic through residential areas and along unsuitable residential street. It goes on to state that off-site highway improvements to aid traffic circulation on the strategic network at Coltishall will be required.</p> <p>For a number of years now residents of Coltishall and Horstead have had to endure the effects of increasing amounts of traffic transiting through a high street and over a road bridge which are both very narrow such that, on a daily basis, vehicles travelling in opposite directions are unable to proceed without mounting and driving on the pavements. The sheer size and volume of the traffic also causes congestion, noise and pollution in a residential area not to mention the constant flouting of the 20mph speed limit. It is clear that the B1150 through Coltishall and over the road bridge to Horstead is no longer fit for purpose and I fear it is only a matter of time before the road bridge becomes dangerously weakened, or worse, there is a serious accident in the vicinity.</p> <p>An already intolerable situation will deteriorate even further when the new developments along the NDR corridor and North Walsham come to fruition. Residents were so concerned about the impacts of the GNGP and NNDC local plan, specifically the large North Walsham expansion, that a traffic report specifically addressing the problems in Coltishall and Horstead was requested. The "report" was completed in September last year but has only just been released into the public domain (and that took a freedom of information request). Unfortunately, the report turned out to be a Technical Note addendum to the existing feasibility study for the North Walsham Link Road. It utterly failed to accurately portray the situation mentioned above. It also used obsolete data and inappropriate modelling to arrive at conclusions that were vague to put it mildly. It went on to say that further data would need to be collected and analysed but made no mention when this would happen or who would actually undertake the task. In the mean time NNDC's local plan advances through its consultation stages without this crucial information.</p> <p>A large part of the problem is that there is presently no formal cooperation between NNDC and BDC. It is obvious that NNDC have not consulted BDC about the highway implications of their local plan and specifically the North Walsham development. I find this quite extraordinary given that the National Planning Policy Framework actually says:</p>

	<p><i>"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."</i></p> <p>I contend that the cumulative impacts on Coltishall and Horstead of the NNDC local plan would, without doubt, be severe. In fact, the highway situation in both villages is already severe. This is a critical health and safety issue for our communities and any development that exacerbates the situation must be put on hold until a solution is found.</p>
Modifications requested	
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	North Walsham
Consultation Point Number	14
Section of the Plan	14.0.3 and 14.1.5
ID	LPS37
Response Date	28/01/2022 16:23:43
Name	Mr Michael Rayner
Organisation	The Battlefields Trust
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	Yes
* Yes	
* No	
Has the duty to cooperate been met?	Yes
* Yes	
* No	
Do you consider the plan to be Sound?	No
* Yes	
* No	
Reason(s) not Sound	It is not consistent with national policy
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	The Battlefields Trust is pleased to see reference to the non-designated heritage asset of the North Walsham 'Battlefield site' at point 6 of Policy NW62/A, Land West of North Walsham.
Modifications requested	<p>To ensure soundness of the Plan we suggest adding reference to this heritage asset elsewhere in the draft plan as follows:</p> <p>14.0.3 Add the following: North Walsham has the non-designated heritage asset of the North Walsham Battlefield site.</p> <p>14.1.5 Add the following bullet point: the non-designated heritage asset of the North Walsham Battlefield site.</p> <p>This would ensure the Plan sets out a positive strategy for the conservation and enjoyment of the historic environment in line with para. 190 of the NPPF. By including these additional references to the 'Battlefield site' it would ensure consistency within the Local Plan and with national policy.</p>
Appear at examination hearing session(s)?	No, I do not wish to participate in examination hearing session(s)
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	

Attachment(s)	
Consultation Point Title	North Walsham
Consultation Point Number	14
Section of the Plan	14 North Walsham
ID	LPS97
Response Date	17/02/2022 11:04:56
Name	Mr Bill Musson
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	I do not consider a part of the plan to be effective as follows. The North Walsham developments will necessitate off site improvements to the strategic road network in Coltishall to facilitate the huge increases in traffic both before, during and after the development. All the proposed North Walsham Link Road options lead southbound traffic out onto the B1150 which eventually passes through Coltishall and over the Horstead road bridge. This route is completely unsuitable. Bearing in mind the residents of Coltishall would like to keep the use of their High Street for commercial and residential activity and the adjacent parking that supports it. What exactly are the off-site improvements going to be? To date there is no evidence of any plans to mitigate the devastating effects of the huge increase in traffic both in terms of numbers and size. Given the plan is in its final consultation phase I would expect to have seen at least a draft proposal on how this traffic mitigation might be achieved.
Modifications requested	I suggest that the North Walsham developments and Link Road plans be shelved until there is a clear plan to mitigate increases in traffic volumes along the B1150 strategic road network through Coltishall and over the Horstead road bridge.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	Because thus far I do not believe this issue has been taken seriously or sufficient evidence gathered to make informed judgements about the disastrous effects of traffic on small Broadland villages.
Attachment(s)	

Consultation Point Title	Land at Norwich Road & Nursery Drive
Consultation Point Number	Policy NW01/B
Section of the Plan	Policy NW01/B Land at Norwich Road & Nursery Drive
ID	LPS163
Response Date	23/02/2022 14:53:17
Name	Miss Naomi Chamberlain
Organisation	Norfolk County Council - Minerals & Waste Policy
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not consistent with national policy
Explanation	Norfolk County Council in its capacity as the Mineral Planning Authority considers that Policy NW01/B is currently unsound, as it is inconsistent with national policy in relation to mineral resource safeguarding.
Modifications requested	The policy can be made sound by including the wording below, which was included in the response by the Mineral Planning Authority, to the Regulation 18 sites consultation in May 2019. 'The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.'
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land at Norwich Road & Nursery Drive
Consultation Point Number	Policy NW01/B
Section of the Plan	Policy NW01/B Land at Norwich Road & Nursery Drive
ID	LPS144
Response Date	23/02/2022 14:50:00
Name	Miss Naomi Chamberlain
Organisation	Norfolk County Council - Highway Authority (Major & Estate Development)
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	

Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	The A149 / B1150 traffic signal junction is sensitive to traffic conditions and may be impacted by vehicle-based trips and active travel from the development. The development impact at the junction requires formal assessment, along with implementation of any agreed mitigation measures.
Modifications requested	Policy NW01/B must include a requirement to undertake a Transport Assessment to include the A149 / B1150 traffic signal junction and implement any agreed mitigation measures.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land at Norwich Road & Nursery Drive
Consultation Point Number	Policy NW01/B
Section of the Plan	Policy NW01/B Land at Norwich Road & Nursery Drive
ID	LPS450
Response Date	07/03/2022 16:17:00
Name	
Organisation	Hopkins Homes
Agent Name	Mr Jake Lambert
Agent Organisation	Bidwells
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	<p>Hopkins Homes Ltd strongly supports the proposed allocation of Policy NW01/B – Land at Norwich Road & Nursery Drive within the Final Draft (Reg 19) Local Plan.</p> <p>We broadly support the wording included within the draft allocation NW01/B, subject to some minor revisions to ensure soundness, as detailed in this Section. Delivery of the site within the Plan period to 2036 is achievable. The site remains suitable, available, achievable and viable for the following reasons:</p> <p>The northern half of the site is allocated in the adopted Local Plan, alongside land to the east and west, thereby establishing the principle of mixed-use development at the site (policy ref: NW01). Land to the east and west has been delivered in accordance with the adopted site allocation reference: NW01, through the following planning applications:</p>

- Planning Application Ref: PF/13/0866 – Construction of 176 dwellings, public open space and a car park to serve the railway station.
- Planning Application Ref: PF/15/1010 – Construction of 100 dwellings and 0.89ha of land for commercial uses.
- Planning Application Ref: PF/19/1226 – Construction of 5no. units for B2/B8/sui generis use.

The completion of these adjoining developments has established the context of the local area. The retention Policy NW01/B and expansion to include additional land to the south in the adopted Local Plan enables the completion of a significant existing site allocation in the period to 2036.

As detailed in Policy SS1 of the Regulation 19 publication, North Walsham is identified as one of the Large Growth Towns, which will accommodate most of the District's housing growth requirements in the period to 2036. Policy NW01/B therefore forms a strategically significant component of the adopted and emerging Local Plan, which can come forward for development in the early stages of the Plan period.

Hopkins Homes Ltd are entering into an option agreement for the developable elements of the site proposed for allocation. The site is not restricted by any leases or restrictive covenants and is readily available for development.

There are no site-specific constraints which could preclude the delivery of residential development on the site. Hopkins Homes are currently in the process of preparing a hybrid planning application to bring forward a development proposal in broad accordance with NW01/B and the emerging Local Plan as a whole. Pre-application engagement with the Local Planning Authority and public consultation with the local community and key stakeholders took place in 2021.

Development of the site for residential purposes is considered viable, subject to viable levels of affordable housing.

As has been demonstrated, the site is suitable, available, achievable and viable, and is deliverable within the Plan period to 2036. There are no constraints which would affect the suitability of the site for residential development. The allocation is 'sound' given that it has been positively prepared, justified, effective and consistent with national planning policy. Hopkins Homes Ltd are therefore supportive of North Norfolk District Council's proposed allocation of NW01/B for development. Some minor revisions, detailed in Question 6 are recommended to ensure the effectiveness of the policy.

Modifications requested

Supporting text at paragraph 14.1.5 states that the site is subject to an Area based Tree Preservation Order. The TPO is, at the time of writing, in draft form, and a rather blunt instrument to restrict tree loss on the site. Engagement with the District Council's Tree Officer is being undertaken to refine the TPO to better reflect the arboricultural condition of the site, following survey work undertaken in 2021. This part of paragraph 14.1.5 is not justified by evidence, and is therefore not consistent with Paragraph 35(b) of the NPPF.

Supporting text at paragraph 14.1.5 also states that the off-site mains water reinforcement and enhancement to the foul sewerage capacity will be required. As part of the emerging development proposals, Anglian Water have prepared a pre-planning assessment report to guide the foul water drainage strategy. In this report, included at Appendix A of this representation, Anglian Water state that the North Walsham Water Recycling Centre has capacity to treat additional flows from the development of the site. This element of the supporting text, and Part 7 of the policy, should therefore be amended to recognise the latest position in the local area. Without this acknowledgement, the paragraph fails to recognise the latest evidence received from the statutory undertakers, causing non-conformity with Paragraph 35(b).

Part 9 of the Policy requires not less than 100 units of specialist elderly persons accommodation to be provided on site, in accordance with Policy HOU2. As described at paragraphs 2.16-2.20 of this representation, Policy HOU2 should be amended to omit the arbitrary care provision requirements included within the policy at present. Furthermore, market and local demands may determine that a facility comprising 100 units of accommodation is not viable at the site, so NW01/B requires flexibility in this aspect of the policy.

Through detailed design development with both the Local Planning Authority and local residents, separation has been incorporated between existing properties along Norwich Road and Nursery Drive and the proposed development, through private garden provision and

	<p>landscape buffering. The requirement at Part 4 of the policy should be refined as detailed below.</p> <p>For the avoidance of doubt, these minor alterations are detailed below:</p> <p>Policy NW01/B</p> <p>Land at Norwich Road & Nursery Drive</p> <p>Land amounting to 18.6 hectares, as defined on the Policies Map, is allocated for a mixed-use development including approximately 350 dwellings, elderly persons accommodation, the retention 2 hectares of existing employment land and provision of 3.5 hectares of public open space and supporting infrastructure.</p> <p>Planning permission will be granted subject to compliance with relevant Policies of this Plan and the following site specific requirements:</p> <ol style="list-style-type: none"> 1 Delivery of an estate road providing a through highway connection with adjoining residential developments to the north-east and south-west prior to occupation of no more than 150 dwellings; 2 Delivery of not less than 3.5 hectares of public open space; 3 The retention of the existing businesses on employment land of no less than 2 hectares; 4 Provision of a landscape buffer of an offset of no less than 6 metres between the development site and the existing properties at Norwich Road and Nursery Drive; 5 Provision of pedestrian and cycle links to the railway station, town centre and local schools; 6 Submission and approval of effective surface water management ensuring that there is no increase of surface water run-off off site; 7 That enhancement to sewerage infrastructure is undertaken where necessary ahead of occupation of dwellings to prevent detriment to the environment and comply with Water Framework Directive obligations; 8 Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS); and, 9 Delivery of comprehensive development in accordance with agreed phasing which ensures delivery of all aspects of the allocated uses including not less than 100 units of specialist elderly persons accommodation of a scale supported by a site specific local market needs assessment.
<p>Appear at examination hearing session(s)?</p> <p>* No, I do not wish to participate in examination hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To support the proposed allocation and respond to any questions that may be raised in relation to the site.
Attachment(s)	North Norfolk Local Plan Regulation 19 Representation [Hopkins Homes Ltd].pdf
Consultation Point Title	Land at Norwich Road & Nursery Drive
Consultation Point Number	Policy NW01/B
Section of the Plan	Policy NW01/B Land at Norwich Road & Nursery Drive
ID	LPS513
Response Date	07/03/2022 23:20:00
Name	Mr John Tofts
Organisation	J N Tofts
Agent Name	Mr Tom Parish
Agent Organisation	Savills (UK) Ltd
<p>Do you consider the plan to be Legally Compliant?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Has the duty to cooperate been met?</p> <p>* Yes</p> <p>* No</p>	Yes

Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Transport Infrastructure Our client is concerned that any development on the site, particularly at the scale proposed, would place disproportionate pressure upon a road network which appears already to be operating at capacity. The requirement for a link road to ease congestion and facilitate growth has been identified to in the context of the proposed North Walsham West development, however it is not clear that any adequate provision or consultation has been made as far as the Land at Norwich Road and Nursery Drive is concerned. The current consultation does state that the development will deliver a section of road that will link two previously developed parcels, one of which is directly adjacent to the land at Heath Farm. Drainage There has been no meaningful consultation nor proposals for surface water drainage given the change of use of a significant area of land away from agriculture. The topography of the land, illustrated below with an extract from the Environment Agency's LIDAR Composite Digital Terrain Model, presents a significant potential risk of flooding land at Heath Farm, especially in heavy rain, impacting upon soil structure and yield potential unless adequate surface water management and mitigation measures are installed. Mr Tofts has raised this with North Norfolk District Council and Hopkins Homes directly at previous consultations, with no response to date.
Modifications requested	Transport Infrastructure The Local Plan should be modified to set out clearly the transport infrastructure requirements to adequately facilitate the proposed development, ensuring this work is undertaken in a sequential manner if the development is phased. Drainage The current policy drafting is weak in respect of the obligation, design and execution of the works required to mitigate the impact upon the adjacent property. The policy should be amended to ensure adequate measures, designed to facilitate the entire development are considered implemented at all stages of the process. Communication and engagement are a vital aspect of this, neither of which have been effective to date.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	Mr John Tofts is a neighbouring landowner, and therefore has an inherent, valid interest in any proposed development within the draft allocation.
Attachment(s)	NNDC Consultation Response - J N Tofts.pdf
Consultation Point Title	Land at Norwich Road & Nursery Drive
Consultation Point Number	Policy NW01/B
Section of the Plan	Policy NW01/B Land at Norwich Road & Nursery Drive
ID	LPS735
Response Date	28/02/2022 08:14:00
Name	Mrs Debbie Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	

* Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>Whilst there are no designated heritage assets within the site, Stump Cross/Wayside Cross which lies to the west of the site is a scheduled monument and grade II listed. However, development of the site is likely to have limited impact on this heritage asset, owing to the nature of the asset itself.</p> <p>We welcome the preparation of a Heritage Impact Assessment in the Historic Environment Topic Paper. This provides robust evidence of the potential impact on the historic environment and suggests appropriate mitigation measures.</p> <p>The HIA sets out appropriate policy wording for inclusion in the Plan (see page 91). However, unfortunately this wording has not been included in the Plan. The policy needs amending to incorporate the wording from the HIA. Ideally the wording from the HIA should be replicated in the Plan.</p>
Modifications requested	<p>Replace criterion 1 to read:</p> <p>Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area. Development should include the following mitigation measures (as set out in further detail in the Heritage Impact Assessment):</p> <ul style="list-style-type: none"> • Retain and enhance landscaping along the southern, south western and north eastern boundaries of the site • Retain the hedgerow along the northern boundary of the site along Nursery Drive • Retain the strong hedgerows and trees within the centre of the site • Lower density, single storey development to be located to the south of the site
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land at Norwich Road & Nursery Drive
Consultation Point Number	Policy NW01/B
Section of the Plan	Policy NW01/B Land at Norwich Road & Nursery Drive
ID	LPS704
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound?	Yes

* Yes	
* No	
Reason(s) not Sound	
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	<p>Sound – Subject to project level HRA where appropriate</p> <p>In line with the plan's HRA, we recommend that a project level HRA and/or appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal.</p> <p>Priority habitats and species should also be considered to assess the impact of the development proposals on local wildlife, in line with paragraphs 175 and 176 of the NPPF.</p>
Modifications requested	
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

14.2 Employment: Land East of Bradfield Road (NW52)

Consultation Point Title	Employment: Land East of Bradfield Road (NW52)
Consultation Point Number	14.2
Section of the Plan	14.2 Employment: Land East of Bradfield Road (NW52)
ID	LPS65
Response Date	08/02/2022 19:35:23
Name	Dr Bianca Finger-Berry
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	No
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	<p>Presentation in the local plan of NW52 as employment land is misleading, it is written as if it had already been allocated, rather than being a new proposal for consideration which was not detailed in any of the previous local plans.</p> <p>No case has been made for the need of additional employment land. No review of existing employment land appears to have been done, as set out in government documents Employment Land Reviews (publishing.service.gov.uk).</p> <p>No new employment land should be designated whilst current land is not used in line with current permissions. A large proportion of current employment land is used for storage of redundant farm vehicles and lorries for which no permission exists. In addition, other parts of the land are used for storing rubble and crushing which has already led to noise complaints and the land is an eyesore. This use of employment land has not provided any additional employment for the local area.</p> <p>Current use of land, loss of a local amenity such as a campsite, and use and character of surrounding areas have not been taken into account when considering the allocation of this land.</p> <p>Further development of that land which will go up to a quiet lane will have a negative impact on the local countryside used by walkers, cyclists and horse riders. The land is unsuitable for employment land and the road.</p> <p>The sustainability assessment concludes it would have a negative impact and no reasons are given as to why this assessment should be ignored.</p> <p>The area should not be designated as employment land for the only purpose of enabling a road to be built at some future point.</p> <p>If a road was needed to link to the industrial estate, this should avoid properties if possible and provide the most direct link to the industrial estate as set out as the northern extension in previous papers such as P.15</p> <p>https://www.north-norfolk.gov.uk/media/6315/north-western-wessex-link-road-feasibility-study-main-report.pdf</p> <p>No reasons have been set out as to why the proposed link road is now following a much longer route past more properties impacting negatively on local residents and walking routes.</p> <p>A road built there would have a negative Impact on local wildlife – there is a Jubilee Wood adjacent to the site with evidence of bats, deer, hares and newts.</p> <p>The site is also unsuitable for development as the domestic water supply for the local houses passes under the land, there is concern</p>

	<p>about interruption and contamination of the local water supply to the settlement on the end of Lyngate Road.</p> <p>The bridge is unsuitable for lorries to pass, this road leading from the countryside into North Walsham and a local supermarket is used by walkers, cyclists and horses and it would be unsafe for them to use the road and cross the bridge alongside lorries. No consideration has been given to the impact of the increase in traffic which would be using the road to go to Knapton and Mundesley as well.</p>
Modifications requested	<p>NW52 should not be designated as employment land as no review of current employment land has taken place and no need for additional employment land has been evidenced.</p> <p>An alternative for lorries to get to the industrial estate, such as lowering the Cromer Road so that high vehicles can go under the bridge should be given consideration to.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	I wish to be reassured that concerns raised have been listened to. I am also concerned that local residents, some of whom have no access to the internet, have not been consulted.
Attachment(s)	

Consultation Point Title	Land East of Bradfield Road
Consultation Point Number	Policy NW52
Section of the Plan	Policy NW52 Land East of Bradfield Road
ID	LPS10
Response Date	17/01/2022 10:20:00
Name	Mr Colin Hayward
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified
Explanation	The NW52 is on rural countryside agricultural land owned by Scrap and Waste company seeking to profiteer from the destruction of the rural countryside and destruction of the rights of rural residents from the right to private and quiet life. The existing site operated by these owners have continuously failed to comply with County operation rules have had massive fires and been subject to multiple complaints for noise disturbance. Such a development will increase heavy vehicle traffic on North Norfolk quiet lanes. If there is any industrial development this should be undertaken on the opposite side of the railwayline where road access is better and away from residential land for example off the Cromer road near Waitrose.
Modifications requested	Not to extend the existing Cornish way site - But if it were to be extended ensure that Cornish Site development to only progress if new road from Cromer road over railway line is constructed. NW52 for office premises only , NOT heavy industry such as waste management, vehicle dismantling, cement works, lorries etc. Also there is a need to be mindful of the high pollution from the industrial site today with spotlights across fields into private dwelling. Such development to be subject to no light being visible beyond the boundaries of the site with all lights off after business hours. Access must be from Cornish way only or from new road from Cromer Road and Lyngate Road / Bradfield road to be closed to HGV vehicles and for access only for other vehicle. Also please be mindful that 4 properties on Lyngate road have private mains water pipes across NW52 and this supply would have to be safeguarded in the event of any development.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	We will be directly impacted by any development in NW52 therefore we should have a voice in any decision making process.
Attachment(s)	
Consultation Point Title	Land East of Bradfield Road
Consultation Point Number	Policy NW52

Section of the Plan	Policy NW52 Land East of Bradfield Road
ID	LPS66
Response Date	08/02/2022 19:37:26
Name	Dr Bianca Finger-Berry
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	No
Has the duty to cooperate been met? * Yes * No	No
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	<p>Presentation in the local plan of NW52 as employment land is misleading, it is written as if it had already been allocated, rather than being a new proposal for consideration which was not detailed in any of the previous local plans.</p> <p>No case has been made for the need of additional employment land. No review of existing employment land appears to have been done, as set out in government documents Employment Land Reviews (publishing.service.gov.uk).</p> <p>No new employment land should be designated whilst current land is not used in line with current permissions. A large proportion of current employment land is used for storage of redundant farm vehicles and lorries for which no permission exists. In addition, other parts of the land are used for storing rubble and crushing which has already led to noise complaints and the land is an eyesore. This use of employment land has not provided any additional employment for the local area.</p> <p>Current use of land, loss of a local amenity such as a campsite, and use and character of surrounding areas have not been taken into account when considering the allocation of this land.</p> <p>Further development of that land which will go up to a quiet lane will have a negative impact on the local countryside used by walkers, cyclists and horse riders. The land is unsuitable for employment land and the road.</p> <p>The sustainability assessment concludes it would have a negative impact and no reasons are given as to why this assessment should be ignored.</p> <p>The area should not be designated as employment land for the only purpose of enabling a road to be built at some future point.</p> <p>If a road was needed to link to the industrial estate, this should avoid properties if possible and provide the most direct link to the industrial estate as set out as the northern extension in previous papers such as P.15 https://www.north-norfolk.gov.uk/media/6315/north-walsham-western-link-road-feasibility-study-main-report.pdf</p> <p>No reasons have been set out as to why the proposed link road is now following a much longer route past more properties impacting negatively on local residents and walking routes.</p> <p>A road built there would have a negative Impact on local wildlife – there is a Jubilee Wood adjacent to the site with evidence of bats, deer, hares and newts.</p> <p>The site is also unsuitable for development as the domestic water supply for the local houses passes under the land, there is concern about interruption and contamination of the local water supply to the settlement on the end of Lyngate Road.</p> <p>The bridge is unsuitable for lorries to pass, this road leading from the countryside into North Walsham and a local supermarket is used by walkers, cyclists and horses and it would be unsafe for them to use</p>

	the road and cross the bridge alongside lorries. No consideration has been given to the impact of the increase in traffic which would be using the road to go to Knapton and Mundesley as well.
Modifications requested	Not allocated NW52 as employment land Give considerations for an alternative to lorries reaching the industrial estate.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To ensure that concerns have been listened to. I am also concerned that local residents without access to the internet have not been consulted with.
Attachment(s)	
Consultation Point Title	Land East of Bradfield Road
Consultation Point Number	Policy NW52
Section of the Plan	Policy NW52 Land East of Bradfield Road
ID	LPS705
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Sound – Subject to project level HRA where appropriate. In line with the plan's HRA, we recommend that a project level HRA and/or appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal. Priority habitats and species should also be considered to assess the impact of the development proposals on local wildlife, in line with paragraphs 175 and 176 of the NPPF.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

14.3 Mixed-Use: Land West of North Walsham (NW62/A)

Consultation Point Title	Mixed-Use: Land West of North Walsham (NW62/A)
Consultation Point Number	14.3
Section of the Plan	14.3 Mixed-Use: Land West of North Walsham (NW62/A)
ID	LPS155
Response Date	24/02/2022 09:33:08
Name	Miss Naomi Chamberlain
Organisation	Norfolk County Council - Highway Authority (Principal Transport Planner)
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>The Highway Authority is supportive of the principle of the allocation of the land west of North Walsham.</p> <p>In supporting the allocation, the Highway Authority recognises that further and more detailed evidence is required to develop the allocation to masterplan and then to application.</p> <p>The work done to date will help to guide the direction of further work to provide more detail on the transport impacts from the North Walsham West development.</p> <p>It is expected that the development of the masterplan for North Walsham West will require more detailed and up to date transport modelling and transport assessments. This work will inform the travel demand and distribution by all travel modes considering the linkages to be developed within the site and to the existing community.</p> <p>The next stages of transport assessment work will need to determine in detail the impacts and interventions required for satisfactory delivery of the proposed growth having particular regard to promoting low and zero carbon travel choices.</p> <p>There are many variables to look at to secure successful development and at this time the Highways Authority does not consider that there are clear unacceptable impacts that would be so severe that they cannot be satisfactorily mitigated. However, much of the evidence provided to date is high-level, therefore support is conditional on further detailed evidence being produced to support development of a masterplan and detailed planning proposals.</p>
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	The Highway Authority would wish to participate to contribute to the discussion on highway issues associated with this proposed allocation.
Attachment(s)	

Consultation Point Title	Land West of North Walsham
Consultation Point Number	Policy NW62/A
Section of the Plan	Policy NW62/A Land West of North Walsham
ID	LPS162
Response Date	23/02/2022 14:56:23
Name	Miss Naomi Chamberlain
Organisation	Norfolk County Council - Minerals & Waste Policy
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not consistent with national policy
Explanation	Norfolk County Council in its capacity as the Mineral Planning Authority considers that Policy NW62/A is currently unsound; as it is inconsistent with national policy in relation to mineral resource safeguarding.
Modifications requested	The policy can be made sound by including the wording below, which was included in the response by the Mineral Planning Authority, to the Regulation 18 sites consultation in May 2019. 'The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.'
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of North Walsham
Consultation Point Number	Policy NW62/A
Section of the Plan	Policy NW62/A Land West of North Walsham
ID	LPS393
Response Date	07/03/2022 11:56:00
Name	
Organisation	D L Ritchie Will Trust
Agent Name	David Jones
Agent Organisation	Armstrong Rigg Planning
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes	

* No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	SEE ATTACHED FILE
Modifications requested	SEE ATTACHED FILE
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To take part in discussions
Attachment(s)	Enclosure 7 - Policy NW62A - Land West of North Walsham.pdf
Consultation Point Title	Land West of North Walsham
Consultation Point Number	Policy NW62/A
Section of the Plan	Policy NW62/A Land West of North Walsham
ID	LPS518
Response Date	07/02/2022 12:00:00
Name	Mrs Judith Hayes
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	There is no indication of where these buffers or corridors are to be put or the width of these in relation to our property. Where in the proposed housing and link road does it join up with Norwich Road?
Modifications requested	At this stage it would be good to know how much privacy we will get with the buffers and corridors.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of North Walsham
Consultation Point Number	Policy NW62/A
Section of the Plan	Policy NW62/A Land West of North Walsham
ID	LPS443

Response Date	07/03/2022 18:12:53
Name	
Organisation	Richborough Estates
Agent Name	Mrs Raj Bains
Agent Organisation	Boyer Planning
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	<p>The proposed Policy NW62/A: Land West of North Walsham is a mixed-use SUE, that seeks to deliver market and affordable housing in North Walsham. The policy seeks the provision of a new link road, 7ha of serviced employment land, a new primary school and significant areas of landscaping, open space and other required infrastructure.</p> <p>The site is made up of approximately 17 land parcels which include 17 different land ownership Titles. The scale of housing provision (1800 dwellings) is proposed to deliver a large proportion of growth for the District and to support the role and function of North Walsham as a Large Growth Town in North Norfolk.</p> <p>The proposed site-specific requirements of the policy include the prior approval and adoption of a comprehensive Development Brief incorporating a site wide Vision, Masterplan and a Design Code. This is to also detail the early delivery of a link road connecting Norwich Road to Cromer Road and a suitable route over the railway for access to Lyngate/Folgate Road industrial estate.</p> <p>As highlighted throughout our comments, we strongly consider North Walsham as a suitable location for housing and economic growth, however we do not agree that the proposed SUE (Policy NW62/a) will deliver the necessary housing required over the course of the plan period.</p> <p>Whilst the policy seeks to provide a long-term housing strategy, it would fail to provide the necessary housing in the short to medium term and would in all likelihood fail to deliver a meaningful number of dwellings within this plan period that would meet the housing requirement.</p> <p>We have identified a number of critical factors that would fundamentally affect the delivery of the SUE and the proposed policy. These factors are set out below.</p> <p>Delivery of Infrastructure</p> <p>The SUE would be subject to the delivery of the necessary infrastructure including community facilities, 2 form entry schools, a local centre and health services. The SUE is proposed to provide a range of community facilities, employment opportunities and two new Local Centres are proposed to be incorporated within the development, one of which would be situated directly next to the school site off Aylsham Road. It is understood that discussions are also being held between the NHS and the CCG regarding the potential to also provide health care facilities within the Local Centre. In addition, up to 7 hectares of employment land are proposed.</p> <p>In order to ensure the proposed development achieves the social and environmental objectives outlined in paragraph 8 of the NPPF (2021), it is essential that these facilities are provided at an early stage in the development of the SUE to ensure residents have access to those services and amenities to meet their day to day needs without having to travel further afield.</p> <p>A phasing strategy was required as per the First Draft Local Plan Policy DS 15 which has now been removed from the Regulation 19</p>

submission version of the Local Plan. Given the level of infrastructure required and the size and scale of the site, this questions how sustainable will the delivery of the site be during the early stages of development, without putting a strain on existing local services and facilities. Pressure on existing services such as schools and dentists are a critical issue for North Walsham and features in the Consultation Statement (from page 290) for the emerging Local Plan and the North Walsham Western Extension Consultation and Engagement Planning Policy & Built Heritage Working Party report (See Appendix 2).

A phasing strategy would be key to show how potential development parcels would come forward, along with the key infrastructure to support it over time. The proposed policy fails to stipulate the need for a phasing strategy, which further contributes towards the lack of sufficient information to support the site allocation and leads to doubt over whether the delivery of the SUE will be phased in such a way to ensure critical infrastructure is delivered alongside it in the early phases of development.

The delivery of key infrastructure to support the SUE is critical to the overall deliverability of the site. Delays in infrastructure coming forward can affect the speed of build out rates and it is critical that there is a sufficient mechanism to phase the delivery of infrastructure alongside the development phases, before the site is allocated.

Multiple Landowners

The site is promoted by one single consortium and 3 land owners as set out in the Local Plan, however our investigations reveal that there are 17 different Titles within the proposed SUE allocation, owned by different landowners and with a number of different covenants. In our experience, whilst a large number of Titles may not necessarily prevent a site from being delivered, it adds a further level of complexity to the agreement of phasing, signing up to a S106 agreement for infrastructure and potential complications with legal rights for tenants. This indicates that the site is potentially not immediately deliverable and therefore the evidence to support the proposed allocation is insufficient.

Further to the above point, as stated in our comments to the North Walsham Western Extension Consultation (June 2021), this would result in the need for land assembly and equalisation agreements. Given the scale of the proposed site, this would result in a lengthy process, which would potentially have a significant impact on the delivery of the scheme.

Whilst the Council acknowledge that the delivery of the site is complex and may take time to come to fruition, there is no evidence or supporting information to demonstrate how the landownership issues would be resolved or not result in significant delays to the delivery of the site.

Despite the submission of our previous comments, the Council have failed to include any further evidence in the emerging Local Plan to address these issues.

The likelihood of all landowners agreeing to the proposed aspirations of the site, and the site being granted permission and partially built between 2023-2036 is, in our view, not realistic or deliverable and therefore the SUE is not suitable for allocation within this plan.

Preparation of the Development Brief & Design Code

Whilst the site is free from physical constraints, the proposed site-specific requirements of the policy require the prior approval of a Development Brief incorporating a site wide Vision and Masterplan, and a site wide Design Code detailing design principles for all development and land uses.

Considering the preparation stages of the Local Plan, the preparation of a site wide Development Brief and Design Code are yet to be prepared and consulted on before they can be adopted as a Supplementary Planning Document and used to inform the delivery of the scheme.

In the First Draft Local Plan (Part 1) Regulation 18 version, the SUE was proposed as Policy DS 15. The draft policy included proposals for a new community comprising of 1,800 new homes, employment opportunities, community facilities, open spaces and the physical and social infrastructure necessary to support the development. As detailed in the draft policy, the allocation was subject to the production of a Development Brief, which would be prepared by the Council and landowners/promoters and would be subject to public consultation.

In June 2021, the Council undertook their first consultation towards the preparation of the Development Brief and attracted over 180

respondents and 430 responses. A summary of the responses can be found in the Planning Policy & Built Heritage Working Party Report (North Walsham West Consultation & Engagement in Appendix 2).

The consultation highlighted concerns around the delivery of the link road, that the link should be provided first or from the outset of development, how the existing services in the community are already under pressure and previous developments in the town have not provided the necessary infrastructure.

The purpose of the consultation was to obtain views of all interested parties. The Brief is described by the Council to provide *'an agreed framework for the development, setting out clearly and simply the kind of place that should be created, including a Vision and a set of rules which future planning applications should adhere to. It acts as a blueprint and sets out site-specific principles to guide future development proposals and supports the adopted policies of the new North Norfolk Local Plan.'*

As detailed in Paragraph 08 of Planning Policy Guidance relating to Plan-making, the role of such documents is to provide more detailed advice and guidance on policies contained within an adopted Local Plan. They do not form part of the Development Plan and therefore cannot introduce new planning policies. They are however a material consideration in the decision making process, in accordance with paragraphs 2 and 47 of the NPPF (2021), Section 70(2) of the Town and Country Planning Act (1990) and Section 38(6) of the Planning and Compulsory Purchase Act (2004).

Whilst it is accepted the Development Brief would form a material consideration, the policy requirement however stipulates the site would be permitted subject to the prior approval and adoption of a comprehensive Development Brief and Design Code detailing the design principles for all development and land uses.

Noting there would be various iterations of the Development Brief and Design Code following consultation; it would be progressed through the statutory process leading to formal adoption as a Supplementary Planning Document. As such, it would take a period of time to develop and materialise into an SPD. It should be noted that no further consultation on the Development Brief or Design Code has since taken place.

The Planning Policy & Built Heritage Working Party report (see Appendix 2) highlights that a recent request for £600k of funding from the UK Community Renewal Funding was unsuccessful. This funding bid was to specifically support the preparation and production of the Development Brief and Design Code and a number of other technical reports (drainage, natural environment and green infrastructure, an archaeology study of North Walsham Battleground, and feasibility reports on health, libraries and education).

In the absence of funding, the Council will now need to discuss with local partners to take forward elements of the proposed programme without Government funding. In other words, there are financial implications, which relate to the preparation and production of the Development Brief and Design Code, which is now expected to be delivered through existing budgets.

In the absence of funding this has pushed the recommencement of the preparation of the Development Brief and Design Code back. As stated in the report, this is expected to begin post this current Local Plan Regulation 19 Consultation. The report acknowledges this has had an impact on the timing and delivery of the work for the Development Brief.

Where a consultation was proposed for the Draft Development Brief publicised for consultation in Sept/Oct 2021 and final brief prepared at spring 2022, this already indicates a 2-year delay in the preparation of the required SPD. This is evidence of another key issue that will delay the SUE being delivered as per the Council's proposed housing trajectory, which has not been reflected or considered in the emerging Local Plan.

The delay in preparation of the Development Brief and Design Code coupled with the potential Title complications and potential legal obligations presents further delays in the delivery and timing of the North Walsham SUE as set out in Policy NW62/A.

Western Link Road

The proposed site-specific requirements stipulate: 'a new road designed as an attractive main residential street through the development with mixed-use frontage usages and segregated cycle paths and footways. This new road should be suitable for HGV traffic (including high-sided vehicles) and will connect Norwich Road to

Cromer Road, and provide a suitable route over the railway for access to the Lyngate/Folgate Road industrial estate together with appropriate junctions'.

A key element to the proposed SUE is the delivery of the proposed link road, which would connect Norwich Road and Cromer Road and provide a sustainable route over the railway. This is a significant piece of infrastructure, which is both costly and time consuming to deliver. Since the draft publication of the Local Plan, there has been no information made available as to how this link road will be delivered or if indeed, it is viable and deliverable.

There are concerns that the proposed link road would render the SUE an unviable project, which would have a significant impact on housing delivery given that the proposed level of housing in North Walsham accounts for 23% of all housing growth in the District.

Noting the need to improve the local and strategic road network in North Walsham and how the proposed site allocation provides opportunity to alleviate long standing traffic issues, there is a significant lack of information to support how the new link road will be delivered. Given the size and scale of the proposed SUE, the delivery of a new link road is fundamental to the delivery of the proposed allocation. Evidence to support the provision of the link road should be provided as part of the Local Plan making process.

The lack of technical information indicates there is risk to the deliverability of the required infrastructure. As such it is considered that the plan is not justified and therefore fails to meet the test of 'soundness' as set out in paragraph 35 of the NPPF (2021). There is a lack of robust and credible evidence base to support this proposed allocation and this should be reviewed by the Council prior to the submission of the plan for examination.

An Interim Plan Wide Viability Assessment (2018) has been provided as evidence to support the emerging Local Plan. This assessment shows the SUE as not being viable due to abnormal site development costs. The assessment concludes that the site is deliverable, as this can be deducted from the overall land purchase price. However, this raises a fundamental issue as to whether the SUE would be able to deliver any affordable housing and the viability appraisal is silent on this point. Given only 15% affordable housing is required in North Walsham due to viability, this presents a key risk to any affordable housing being provided for as part of the SUE which is an important part of the spatial objectives of the plan.

Given the scale of the proposed SUE, the viability assessment also fails to consider any of the proposed wider infrastructure costs including the new link road, which are necessary to ensure the site is deliverable. These are fundamental to any viability assessment as such we consider this assessment requires further work to ensure that the proposed SUE is deliverable.

The North Walsham Link Road Feasibility Report (2020) Stage 1 and Stage 2 (2021) focuses on the feasibility of delivering the proposed western link road. The report concludes that there would be a significant amount of new traffic linked to the proposed site allocations, and the link road is expected to alleviate the majority of the traffic impacts as a result of the development. Besides the feasibility reports, there are no other sufficient technical evidence to support the proposed plans for the proposed link road, such as how the proposed link road supports a wider transport plan or infrastructure plan for the District.

The Planning Policy & Built Heritage Working Party report (Appendix 2) notes that the Council accept that as the development of the SUE moves towards the planning application stage, further highways evidence such as traffic counts and modelling will be refined to inform a site specific Transport Assessment for the site. Given the length of the proposed link road and necessary junctions, in the absence of technical information, it is considered that further work should be carried out to demonstrate deliverability of the link road prior to the submission of the plan for examination. This will undoubtedly take some length of time to finalise, not to mention consultations with the Local Highway Authority, thus further leading to potential delays in the delivery of the SUE.

Overall, there is insufficient evidence and justification to support the proposed allocation and proposed delivery of the SUE during the plan period. We therefore consider Policy NW62/A unsound. The site-specific requirements of the policy are not achievable within the emerging plan period. This presents a significant risk to the delivery of housing provision across the District as we consider that the SUE will fail to supply the necessary amount of housing in a timely manner during the plan period.

Modifications requested	<p>In relation to Policy NW62/A, our representations (please refer to Section 7 of the attached representations) highlight fundamental concerns with the delivery of infrastructure, the deliverability of the individual sites, the absence of a phasing strategy and the deliverability of the new link road, of which have all been considered to affect the overall deliverability of the site coming forward as proposed by the Council in the plan period.</p> <p>Based on the Council's proposed housing trajectory of the proposed SUE and our analysis of what is a more realistic rate of delivery commencing from 2030/31, a total of 550 dwellings would be completed during the final 6 years of the plan period, leaving a total of 1,250 dwellings to be completed post-plan period.</p> <p>This is a significant amount of housing to propose after the plan period, which should be delivered through the allocation of alternative small and medium sites during the early phase of the plan post adoption.</p> <p>We consider the Submission Version of the Local Plan to be unjustified as it fails to meet the tests of soundness, set out in the NPPF (paragraph 35).</p> <p>To ensure the proposed plan can be made sound we strongly suggest the Council look to allocate alternative smaller and medium sites that are readily available to provide and maintain an adequate supply of housing in North Walsham in the early phases of the adoption of the plan.</p> <p>Land at Paston Gateway is considered to be suitable, available and deliverable and should be considered for allocation within the plan prior to the submission of the plan for examination. Please refer to Section 8 of the attached representations for more about land at Paston Gateway</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	Our representations provide fundamental concerns about the proposed policies contained in the Local Plan. It is critical the Inspector hears our views on why we think the Plan is unsound and will fail to meet local housing needs of North Norfolk. Ultimately, our views could help assist the Council in ensuring there is an adequate supply of new housing across the District and throughout the short, medium and long term period of the Local Plan.
Attachment(s)	
Consultation Point Title	Land West of North Walsham
Consultation Point Number	Policy NW62/A
Section of the Plan	Policy NW62/A Land West of North Walsham
ID	LPS511
Response Date	07/03/2022 22:22:00
Name	Mr Mike Jones
Organisation	Norfolk Wildlife Trust
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective

Explanation	We remain concerned at the size of this proposal, which would significantly expand North Walsham into open countryside to the west.
Modifications requested	As any development in this area would lead to the large scale loss of farmland habitats, with potentially significant impacts on farmland bird species, it will need to be accompanied by a robust biodiversity net gain assessment which takes into account the needs of the species assemblage dependant on these habitats, as well as the habitats themselves. The proposal also crosses the Weavers Way CWS, which will need to be safeguarding and buffered from indirect impacts (noise, light etc.). We recommend that the policy text refers to the above requirements.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of North Walsham
Consultation Point Number	Policy NW62/A
Section of the Plan	Policy NW62/A Land West of North Walsham
ID	LPS440
Response Date	07/03/2022 15:10:00
Name	Mr Will Wright
Organisation	ESCO Developments, Flagship Housing Group & Lovell Partnerships
Agent Name	Sarah Hornbrook
Agent Organisation	Bidwells LLP
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	SEE ATTACHED FILE On behalf of a Consortium comprising ESCO Developments Ltd, Flagship Housing Group and Lovell (hereafter 'the Consortium') we strongly support the proposed allocation of land West of North Walsham under Policy NW62/A (hereafter 'the Site') as a mixed-use sustainable urban extension to the town. In accordance with the National Planning Policy Framework's (NPPF) definition of 'developable', the proposed allocation represents a suitable location for development, is available, is achievable with a realistic prospect of housing being delivered on the site, and, subject to clarification on matters relating to NNDC's Viability Assessment, is viable. The Site is capable of delivering a significant quantum of development in a highly sustainable location. However, whilst the principle of allocating the site for development is considered sound, in accordance with the tests set out in paragraph 35 of the NPPF, it is considered that the requirements of the policy should be slightly amended to ensure that the policy remains effective, justified and consistent with national policy. Background The Consortium are promoting 94.31 hectares (ha) of the wider 108.3ha Site identified within Policy NW62/A. This Representation is

accompanied by a Vision and Delivery Document, which includes an Indicative Masterplan, and which relates to the whole of the allocation Site. The purpose of this is to demonstrate that the wider allocation can be delivered, whilst also confirming that the key elements of the policy can be delivered on land within the Consortium's control, and that bringing forward a planning application for development on the Consortium controlled land would not prejudice the delivery of the wider aspirations of the allocation, through separate applications on the land outside the Consortium's control.

Confirmation of Deliverability/Developability

Suitability

North Walsham is identified in the Proposed Submission Version of the North Norfolk Local Plan (NNLP) as a Large Growth Town, and is the largest of the seven towns in the District (by population) according to the 2011 census. The NNLP defines the three Large Growth Towns (Cromer, Fakenham and North Walsham) as the main centres of population with the broadest range of day-to-day services, including 'higher order' services, which perform a key role in providing services and employment across a wide area.

As such, within Policy SS1 the NNLP identifies the Large Growth Towns as the focus for a significant proportion (approximately 50%) of the development required to meet the District's needs in the period to 2036.

North Walsham itself provides a wide range of public services which are identified in Para 2.1.13 of the NNLP, and include health, education, leisure and retail facilities, employment opportunities, as well as good levels of accessibility and public transport services (train and bus services). The town benefits from a sixth form college, which is affiliated with Norwich City College. Furthermore, the town is relatively unconstrained in terms of landscape and ecological designations when compared to other parts of the District which lie within the Norfolk Coast Area of Outstanding Natural Beauty (AONB) and The Broads National Park.

Accordingly, North Walsham provides a wholly suitable location for strategic-scale growth, which can provide a wide range of infrastructure improvements, such as a school, employment, health and green infrastructure, as well as a 'link road' to the west of the town which will provide benefits to both existing and future residents.

Turning to the site, it is not subject to any landscape, nature or heritage designations, and, subject to appropriate mitigation identified in the Vision and Delivery Document, will have minimal impact on the natural, built and historic environment. It is located immediately adjacent to the settlement boundary, and will assist in protecting other, more sensitive locations within the District, from development pressure. As such, it is a logical location for growth.

Accordingly, it is evident that the identification of North Walsham, and specifically land covered by Policy NW62/A, as a location to accommodate at least 1,800 dwellings, 7 hectares (ha) of employment land, green infrastructure, community facilities and a new road linking Norwich Road and Cromer Road, is fully justified.

The Site's ability to meet the specific requirements of Policy NW62/A is considered below, together with suggested revisions to the policy wording where considered necessary to ensure soundness.

Quantum of Development

Policy NW62/A currently identifies the Site as being suitable to accommodate approximately 1,800 dwellings, 7 hectares of employment land, green infrastructure, community facilities and a new main residential street linking Cromer Road and Norwich Road.

The Masterplan and Vision Document prepared by Bidwells LLP in support of this Representation demonstrates that the Site is capable of delivering this quantum and range of uses.

The Masterplan provides 7ha of employment land at the northern end of the Site, together with 4ha for a primary school and local centre in the centre of the Site, and 37.7ha of Green Infrastructure and Open Space dispersed across the Site.

This leaves a developable residential area of approximately 54.2ha, and to accommodate at least 1,800 dwellings requires an average density of 33 dwellings per hectare. As detailed on the Masterplan, the site has the potential to provide a mix of densities, ranging from 20 to 40 dwellings per net hectare, which is considered to be an appropriate range of densities reflective of the Site's context, in accordance with Policies ENV8 and HOU2. The supporting text of the NNLP envisages that densities of up to 40dph could be achieved within the towns, and there may, therefore, be scope to increase densities

and deliver more homes, following a more detailed Masterplanning exercise. Consequently, a change to the Policy wording from 'approximately' 1800 dwellings to 'at least' 1,800 dwellings is proposed. The proposed amendment would ensure that the policy is positively prepared, justified, and, therefore, sound.

Development Brief and Design Code

The Consortium recognise and support the need to prepare a Development Brief and Design Code to establish key principles and parameters to inform and guide the wider development of the site, and are in the process of preparing these.

Development Briefs and Design Codes help to maintain a consistency in the quality of design of development that is to be delivered over a long period of time and potentially by a number of different housebuilders. These documents, which will be prepared in close consultation with key stakeholders, will provide a framework for the delivery of a high-quality development, providing a detailed set of simple, concise and illustrated requirements, that provide parameters to guide the development and ensure the creation of healthy, environmentally responsive, sustainable places, that provide consistent high-quality design.

However, the Policy as currently drafted requires the Development Brief to be approved and Adopted (presumably as a Supplementary Planning Document) by the Council in advance of any applications being determined. This requirement is considered to be unnecessarily onerous, as the Adoption process is notoriously slow and likely to delay the bringing forward of the site. Revised wording is therefore suggested to require that any applications are informed by a Development Brief and Design Code, which are to be approved by the Council in advance of any applications being determined. This approach does not undermine the Council's reasons for requiring a Development Brief or Design Code as the objectives of the policy would still be met and the Council would retain control over key aspects of the development before works commence, but, crucially, it will provide flexibility to allow the site to be delivered early. The proposed amendment would ensure that the policy is positively prepared, justified, effective and, therefore, sound.

Green Infrastructure

The Policy also requires prior approval of a Green Infrastructure Strategy, and the Consortium recognise the importance of this in creating a high quality development with an integrated network of space, excellent accessibility and enhanced biodiversity. For the same reasons detailed above, Revised wording is also suggested in relation to this requirement, for clarity and consistency.

In relation to the specific requirements set out at point 4 of the Policy, the Indicative Masterplan demonstrates that all of these can, in principle, be achieved. It includes 37.7ha of new public open space, including a town park, new sports pitches and allotments, which equates to around 37% of the Site area. A new Country Park is proposed along the southern and western Site boundaries, which will create a green edge to the town. The Weavers Way corridor is a key green access spine, and a pedestrian and cycle crossing point is proposed over the main residential street which prioritises these uses. The Masterplan also incorporates a new green corridor running from north to south.

Notwithstanding the above, it is considered appropriate to include a clause within this section of the Policy, which would allow for qualitative improvements to existing facilities, as an alternative to quantitative provision, should this be considered a more appropriate solution; something that would be informed by discussions with key stakeholders. Similarly, minor alterations are proposed to the policy wording to remove reference to the specific amounts of green infrastructure that must be provided i.e. public open space of 17.47ha. It is likely that these figures will evolve as further work, notably the Development Brief, is progressed, and accordingly a degree of flexibility is required within the policy wording.

This flexibility will ensure provision reflects local need, demand and site characteristics. The proposed amendment would ensure that the policy is positively prepared, justified, effective and, therefore, sound.

Environmental Mitigation

Point 5 of the Policy requires prior approval of a Drainage Strategy; this will form an important part of the development as there is limited surface water drainage capacity in this area, due to the prevailing ground conditions. Revised wording is also suggested in relation to this requirement, for clarity and consistency and for the same reasons detailed above.

The Masterplan incorporates significant areas for sustainable drainage and flood mitigation & storage features, which are integrated into the wider network of green spaces. Whilst further technical work is being undertaken to confirm a more detailed strategy, we are confident based on experience that a suitable strategy can be provided, and that sufficient space is provided within the Masterplan for attenuation features.

Point 6 requires proposals to protect and enhance designated and non-designated heritage assets and their settings, including the Battlefield Site and the Listed Buildings at Bradmoor Farm. A Heritage Assessment has been prepared by Bidwells LLP, which has informed the Indicative Masterplan, and is submitted in support of this Representation. The Heritage Assessment demonstrates that the development shown on the Indicative Masterplan has paid special regard to the preservation of the setting of listed buildings, and has also taken account of the policies of the NPPF with regard to heritage assets to avoid or minimise impacts. The impacts identified in this report relate to two listed buildings at a minor adverse, "less than substantial" level.

An amendment to the Policy wording is proposed to ensure that it is consistent with the other relevant policies in the Plan, such as ENV7, which requires proposal to conserve and, where possible, enhance the historic environment.

The Masterplan incorporates landscape buffers and green corridors along the existing urban edge of the town, to protect the amenity of the existing residential areas, as required by Point 7 of Policy NW62/A.

Sustainable Transport

As set out above, North Walsham benefits from a railway station on the Norwich to Sheringham line, and as such is a highly sustainable location, being one of only a handful of towns in North Norfolk to enjoy such a facility. The provision of further sustainable transport opportunities is an integral part of the illustrative Masterplan, which seeks to provide high quality, safe and direct cycle and pedestrian routes not only through the site but to the Town Centre. The Masterplan envisages that the existing Public Rights of Way and Recreational Routes in and around the Site will form the basis of active, non-vehicular routes which will create meaningful connections with North Walsham, connecting with local services. In addition, new recreational routes will be created throughout the Site, within the Green Infrastructure Network, promoting active travel and increasing the recreational value of the site.

The provision of a new main residential street running through the development is an important requirement of the policy, and forms the spine of the development, and the Masterplan provides segregated pedestrian and cycle routes through this corridor, contributing to a safe, walkable place. Specific infrastructure improvements will be determined through technical assessments, which will establish what mitigation is required to ensure that the impacts of the development are acceptable in planning terms.

Whilst not directly required to mitigate the impact of the development itself, a benefit of the main street would be the removal of HGV traffic from the town centre. Whilst the Consortium cannot directly deliver the railway crossing, as the land in this area is outside their control, development of the Consortium's land will not prejudice its delivery, and can, if appropriate, facilitate its delivery (e.g. through s106 contributions).

Policy NW62/A requires a number of off-site improvements to both pedestrian and cycle routes into the town centre, and to key junctions on the existing highway network. Technical work is ongoing, but we are confident that the Site will be able to deliver significant highways and accessibility improvements that will be of benefit to the whole community, either on Site or via s106 contributions.

It is therefore considered that the requirements of points 8-13 of Policy NW62/A can be met.

Community Facilities and Employment

Point 14 of Policy NW62/A requires provision of new 2-form entry primary school and a local centre providing options for local convenience retail and health services and other community uses. The Masterplan provides approximately 4ha of land in the centre of the Site for these uses, close to existing housing and public rights of way.

In terms of the provision of the primary school and the health facilities, it is understood that the development of these facilities will be the responsibility of third parties, such as Norfolk County Council.

Accordingly, the policy should make it clear that land only is required to be safeguarded within the development for these uses. The proposed amendment will ensure the policy is justified and therefore sound.

The Policy also includes a requirement to consider the options for enhancement of facilities at North Walsham Football Club, which lies adjacent to the site. The Club's aspirations are, as yet, not known, but there would be scope to provide land for additional pitches, should this be required, or to improve/enhance the existing facilities, if more appropriate. It is considered that such measures should be considered as part of the overall strategy for the site's provision of formal open space and we have suggested amendments to Policy NW62/A to provide such flexibility.

The Masterplan also allows for 7ha of employment land at the northern end of the Site, in accordance with point 16 of the Policy. Whilst some of this land (4ha) is outside the Consortium's control, it is being promoted separately by the relevant landowners, and the Indicative Masterplan demonstrates that development of the Consortium-controlled land would not prejudice delivery of this element of the allocation.

New Homes

Point 17 of Policy NW62/A requires the delivery of approximately 1,800 new homes, with a mix of dwelling types, size and tenures. The Masterplan demonstrates that this can be achieved, with an average density of approximately 33 dwellings per hectare (dph) based on a gross developable area of 54.2ha. The supporting text of the NNLP envisages that densities of up to 40dph could be achieved within the towns, and there may, therefore, be scope to increase densities and deliver more homes, following a more detailed Masterplanning exercise. Consequently, as detailed above, a change to the Policy wording from 'approximately' 1,800 dwellings to 'at least' 1,800 dwellings is proposed.

As set out in the Vision and Delivery Document, the Site will be divided into Character Areas, each with a distinct identity, and within these areas there will be a range of densities and a mix of dwellings to meet local needs. Across the site, densities are likely to range from around 20dph to 40dph, to reflect local context and site sensitivities.

Summary

The Masterplan and Vision and Delivery Document provide clear evidence that the Site is a suitable location for development of the quantum and nature envisaged in Policy NW62/A, and can, in broad terms, meet the detailed requirements of the Policy, without any significant adverse impacts.

Availability

The majority of the Site (87%) is under an Option Agreement to the Consortium, all of whom have an excellent track record of delivering large-scale housing development in the local area.

Further details of each of the Consortium members is provided in the Vision and Delivery Document, and a summary is set out below.

Lovell is a leading provider of partnership and open-market housing, and is a part of the Morgan Sindall Group, a leading UK construction and regeneration group, which has been working in East Anglia for over 30 years.

Flagship Homes is a developer with a strong social purpose and vision to solve the housing crisis in the East of England. As a provider of both open-market and affordable homes, it reinvests any profit it makes into providing more affordable homes. Over the last three years Flagship Homes has provided 1,590 new affordable homes across the region. In 2020/21 Flagship Homes delivered 460 new affordable homes, sold 139 shared ownership homes and six open market sale homes. Over the next five years, Flagship plans to build over 4,000 new affordable homes across the region. Across North Norfolk, Flagship has built over 700 homes with approximately 200 of those being built in North Walsham.

ESCO Developments is a self-funded Strategic Land Promoter, whose vision is to provide exemplar developments and to be respected by the communities, local authorities and landowners they work within. ESCO have recent experience of securing planning consent for varying scales of residential development, including sites in Norfolk and Suffolk, with subsequent disposal to housebuilders.

The Masterplan incorporates the full extent of allocation NW62/A, including those areas that are not under the control of the Consortium, and demonstrates that it will be possible to bring forward a comprehensive development of the site despite the multiple ownerships

involved. The Consortium are currently in discussion with the other landowners to seek to incorporate the full Site within their control, but should that not be possible, the Masterplan demonstrates that the majority of the critical elements of the development, including the new road between Norwich Road and Cromer Road, land for the school, community facilities and Green Infrastructure can be provided on land within the control of the Consortium, and those that cannot physically be provided, such as the bridge over the railway, could be facilitated through proportionate s106 contributions, if required. Furthermore, the Masterplan illustrates that bringing forward a planning application for development on the land within the Consortium's current control would not prejudice delivery of the wider allocation, which could be subject to separate planning applications in the future.

The Consortium have commenced work on the preparation of an outline planning application, and anticipate being in a position to submit this application by July 2023. Allowing a year for determination, and a further 4 months for completion of the s106 agreement, it is anticipated that the first Reserved Matters application would be determined by June 2025. This would allow a start on site in December 2025, with the first plot sales by the end of 2026.

In terms of housing delivery rates, the Housing Trajectory set out in the NNLP is considered to be generally realistic, both in terms of the start date (as set out in the preceding paragraph) and annual deliveries, which for the most-part are based on two developers producing approximately 50 dwellings per annum, with the additional delivery of a 60-bed extra-care or care facility in each of 2029/30, 2032/33 and 2035/36.

Viability

We are confident that the delivery of the site is viable having regard to the policy requirements of the NNLP and there are no significant factors that we are aware of, at this moment in time, that could prevent the delivery of the site. This comment is, however, made in the context of other representations made in relation to Policy HC04, specifically that to date we are not aware that any Viability Assessment has been undertaken by NNDC in relation to large strategic sites such as this one. We suggest that further work is undertaken prior to the submission of the Plan to understand whether there are any implications for the wording of the relevant policies.

It is likely that this further work in relation to viability will identify 'trigger points' relating to the delivery of key elements of the development, notably infrastructure provision. On this basis, and given that the development will due to its scale be delivered over a period of approximately 20 years, it is recommended that the policy makes specific reference to the delivery of the development, including site infrastructure, in phases. It is proposed that the phasing will be identified as part of the Development Brief. The proposed amendment would ensure that the policy is positively prepared, justified, and, therefore, sound.

Summary

As outlined above, the site is suitable, available and, in principle, viable, and is therefore developable. Residential development in this location, together with associated community facilities, would represent sustainable development, as defined within the National Planning Policy Framework. North Walsham, as a Large Growth Town, is a highly sustainable location, and a preferred location for growth, and the foregoing text demonstrates that this specific site is a suitable location for development in all respects.

As has been demonstrated, the proposed allocation is deliverable within the plan period. There are no constraints which would affect the suitability of the site for residential development. The preceding text demonstrates that this site is a suitable location for development and is capable of meeting the requirements of draft Policy NW62/A.

87% of the Site is within the control of the Consortium, and capable of delivering the key policy objectives, without prejudicing the ability of land outside the Consortium's control to come forward separately.

Accordingly, the Consortium fully support, in principle, the allocation of the Site under Policy NW62/A as a mixed-use sustainable urban extension. However, as detailed above, to help ensure Policy NW62/A is sound, a number of minor alterations are suggested. These are detailed below in line with those explanations provided above.

Modifications requested

SEE ATTACHED FILE

Suggested revisions to the Policy wording are detailed below. New wording is shown in *italics*, wording to be deleted is shown ~~struckthrough~~.

Land West of North Walsham

Land to the west of North Walsham to provide a mixed-use sustainable urban extension amounting to 108 hectares, as defined on the Policies Map, is allocated for ~~approximately~~ *at least* 1,800 dwellings, 7 hectares of employment land, green infrastructure, community facilities and a road linking Norwich Road, Cromer Road and the industrial estate.

Planning permission will be granted subject to compliance with the relevant policies of this Plan and, *where practical and feasible*, the following site specific requirements:

Development Brief & Design Code

- 1 ~~Prior approval and adoption of~~ A comprehensive **Development Brief** incorporating a site wide **Vision and Master Plan** demonstrating how the development will respond to the particular characteristics of the site and detailing the delivery of all of the uses and infrastructure required in this policy, *will be submitted with the first planning application for the site. The approved Development Brief and Vision and Masterplan shall inform any further applications for the site.*
- 2 ~~Prior approval of~~ A site wide **Design Code** to complement the Development Brief detailing the design principles for all development and land uses *will be submitted with the first planning application for the site. The approved Design Code shall inform any further applications for the site.*

Green infrastructure

- 1 ~~Prior approval of~~ A **Green Infrastructure Strategy** detailing the delivery of the green infrastructure including new areas of open spaces, play areas, sports pitches, strategic landscaping and green corridors, *will be submitted with the first planning application for the site. The approved Green Infrastructure Strategy shall inform any further applications for the site.*

The Green Infrastructure Strategy should complement principles in the Design Code and Drainage Strategy *and will be informed by discussions with consultees to ensure it reflects need and demand.* Delivery of on-site green infrastructure should provide the opportunity to contribute towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS):

- 1 Development proposals will provide the following specific green infrastructure:
 - i. ~~at least approximately~~ 17.47 hectares of new public open space including a new 'town park' of ~~at least approximately~~ 2ha, new sports pitches of *approximately* 2ha and a minimum of 2.4ha of allotments, *or, where appropriate and informed by discussions with relevant stakeholders, qualitative improvements considered to be of equivalent value;*
 - ii. a substantial area of strategic green infrastructure at a *minimum of approximately* 10ha to the south and western countryside edge of the development to create a new green edge of the town;
 - iii. enhancement of the Weavers Way corridor acting as a green access spine through the development including improving biodiversity along the corridor. It will provide a pedestrian & cycle crossing point across the link road that prioritises these uses over vehicle traffic;
 - iv. a new green corridor which will traverse north to south through the development providing an access and biodiversity corridor;

Environmental Mitigation

- 1 ~~Prior approval of~~ A **Drainage Strategy** detailing the delivery of sustainable drainage and flood mitigation & storage measures that will be integral to the urban development and green infrastructure, including using surface water runoff as a resource that contributes to water sensitive urban design (WSUD) and integrating the water cycle within the built and green environment, *will be submitted with the first planning application for the site. The approved Drainage Strategy shall inform any further applications for the site.*
- 1 Proposals should protect and, *where opportunities arise*, enhance heritage assets and their settings including designated and non-designated heritage assets including the 'Battlefield Site'. This should include a design, layout and landscaping that protects and enhances the Listed Buildings at Bradmoor Farm;
- 1 Landscape buffers and/or green corridors will, *where appropriate*, be provided along the existing urban edge of the town to protect the amenity of existing residential areas;

	<p>Sustainable Transport</p> <ol style="list-style-type: none"> 1 Provision of a network of interconnected streets, squares, green corridors and public spaces which prioritise moving around on foot and by cycle over the use of private motor vehicles; 1 Delivery of appropriate public transport measures on site providing facilities and regular services to/from the town and key services; 1 Provision of off-site pedestrian and cycle route improvements to the town centre, key services and railway station; 1 Delivery of a new road designed as an attractive main residential street through the development with mixed-use frontage usages and segregated cycle paths and footways. This new road should be suitable for HGV traffic (including high sided vehicles) and will connect Norwich Road to Cromer Road and provide/facilitate a suitable route over the railway for access to the Lyngate/Folgate Rd industrial estate together with appropriate junctions, <i>to be informed and determined by technical evidence to be submitted with any planning application for the site.</i> It should be delivered, <i>in accordance with the phasing plan agreed as part of the Development Brief</i>, at the earliest opportunity; 1 Off-site improvements to the highways and transport network including key junctions that require intervention and mitigation, <i>to be informed and determined by technical evidence to be submitted with any planning application for the site;</i> 2 Delivery of appropriate restrictions on the amount of private traffic (including HGV vehicles) that can travel along the Aylsham Road and Skeyton Road, to be informed and determined by technical evidence to be submitted with any planning application for the site; <p>Community Facilities & Employment</p> <ol style="list-style-type: none"> 1 Provision of community facilities including <i>land</i> for a new 2 form entry primary school focused in a broadly central location within the development, a local centre providing options for local convenience retail and health services and other community uses; Delivery of appropriate restrictions on the amount of private traffic (including HGV vehicles) that can travel along the Aylsham Road and Skeyton Road, <i>to be informed and determined by technical evidence to be submitted with any planning application for the site;</i> 2 Options for the enhancement of facilities at North Walsham Football Club should be considered in line with local and national standards and guidance from Sport England and other sports bodies, <i>as part of the wider Green Infrastructure strategy for the site;</i> 1 Delivery of approximately 7 hectares of employment land located to the north of the allocation site in the Cromer Road/Bradfield Road area, reflecting the prevailing character of the town and recent development provided with direct access from the new link road and major road network. <p>New Homes</p> <ol style="list-style-type: none"> 1 Delivery of <i>at least</i> approximately 1,800 homes built with a mix of dwelling types, sizes and tenures in accordance with Policy HOU2 of this Plan. A range of densities and layouts will provide variety within the scheme in line with the approved Design Code.
<p>Appear at examination hearing session(s)?</p> <p>* No, I do not wish to participate in examination hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>Justification for appearing at hearing</p>	<p>We reserve the right to appear prior to publication of the draft agendas that will set out the Inspector's matters and questions to form the basis of the discussions at the Hearings. The intention to appear is to seek to ensure that the Policy can be made sound.</p>
<p>Attachment(s)</p>	<p>20220307 Regulation 19 Representation NW62A.pdf (3) 220303_UDS68724-A4-0001.pdf (3) 220303 Land west of North Walsham - Initial Heritage Appraisal - FINAL.pdf (3)</p>
<p>Consultation Point Title</p>	<p>Land West of North Walsham</p>
<p>Consultation Point Number</p>	<p>Policy NW62/A</p>
<p>Section of the Plan</p>	<p>Policy NW62/A Land West of North Walsham</p>

ID	LPS413
Response Date	07/03/2022 13:15:00
Name	Mr Berni Marfleet
Organisation	Save Our Streets (North Walsham)
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	No
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<p>We welcome the Deposit stage the Plan has now reached and that it has taken into account many of the issues and objections raised to the earlier Consultation Draft. It will provide a policy led statutory framework for making decisions on development over the period of the Plan and this is essential to prevent sporadic, unplanned and unsustainable development.</p> <p>We feel that given the number and content of the Plan documents to review and respond to, more time should have been granted for this consultation.</p> <p>Our main concern is over the scale of the North Walsham Western Extension development in respect to the high degree and proportion of reliance of housing provision in this allocation to the total need for housing across the District during the Plan period.</p> <p>There is a considerable risk that the whole Plan may not be deliverable given this heavy reliance.</p> <p>This risk is compounded by the lack of evidence and studies on the traffic impacts of the proposals both in and around North Walsham and further afield especially on the B1150 to Norwich in particular through the villages of Coltishall and Horstead and the bridge crossing the River Bure.</p> <p>These including the Transport Assessment should be completed and open to public scrutiny before the Plan proceeds. We need to understand the scale and complexity of the issues and what measures and policies need to be in place in the Adopted Plan.</p> <p>We appreciate that the Development Brief and a Master Plan is a requirement and there has been public consultation on the overarching Vision in 2021 but the policy NW62/A needs to be more specific to reduce the risk of the Vision not being delivered.</p> <p>In particular the "trigger points" for provision of key infrastructure should be contained in the policy to reduce risk of delivery failure. This must include an assessment of how funding will be secured from a mix of developer and public sources especially in relation to the Link Road across the Railway connecting the Industrial Estate and the existing By Pass to remove heavy goods vehicles from the pavement-less Aylsham Road and the historic Town Centre.</p> <p>Following from this, point 13 needs to be more specific in terms of what "appropriate restrictions to private traffic (including HGV vehicles)" are and when they would be implemented possibly in stages and on which roads. Aylsham Road and surrounding roads such as Skeyton New Road are already unsuitable and unsafe for current volumes and types of traffic. Further increases in traffic, given this would be a "desire line" for movement to and from the Western Extension into Town is a</p>

	<p>key issue which needs to be resolved and "cemented" into the Plan at this stage.</p> <p>Measures should include diverting through traffic to the main paved roads to and from the Town by restrictions, traffic management and signage. In accordance with the policies in the Plan including NW62/A the encouragement of sustainable means of transport, Aylsham Road could provide a "Green" and attractive, safe, carbon reducing and most convenient route into the Town Centre (and for the proposed Community Hub at the junction of Aylsham and Greens Roads) for pedestrians, cyclists and the mobility impaired for new residents of the Western Extension as well as existing residents. It would become a "shared space" where more vulnerable users had priority. This would be a major asset in terms of encouraging and delivering modal shift.</p> <p>Any proposals to introduce a one way system along Aylsham and Skeyton New Road would be highly detrimental to these objectives as it would increase capacity and speed of traffic and increase safety risks to vulnerable road users. In particular there is a substantial section of Skeyton New Road which has houses whose front doors open straight out onto the Highway.</p> <p>Finally, on the issue of commuting traffic to Norwich (see above) Policy NW62/A should make a commitment to provision of a Park and Ride Facility at the Railway Station including a public transport interchange for busses and taxis to alleviate congestion at Coltishall, encourage modal shift to public transport and reduce carbon emissions.</p> <p>These are the changes we wish to submit for the modification of the Plan.</p> <p>We therefore object on grounds that:</p> <p>It is not properly justified as it lacks information and data particularly in relation to traffic generation impacts and effective measures to deal effectively with that</p> <p>It is not effective as it poses serious risks of failing to deliver measures required as there is lack of evidence of public funding for the infrastructure, in particular from Norfolk County Council. Consequently, given the heavy reliance on the North Walsham Western Extension housing allocation to deliver the housing needs for the whole District, there is a serious risk to the deliverability and viability of the whole Plan.</p>
Modifications requested	The Plan and policy NW62A needs to be changed to include the securing of funding and specific measures stated above
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	I wish to ensure our organisation's views are properly and adequately heard and addressed
Attachment(s)	
Consultation Point Title	Land West of North Walsham
Consultation Point Number	Policy NW62/A
Section of the Plan	Policy NW62/A Land West of North Walsham
ID	LPS736
Response Date	28/02/2022 08:14:00
Name	Mrs Debbie Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	

<p>Has the duty to cooperate been met?</p> <p>* Yes</p> <p>* No</p>	
<p>Do you consider the plan to be Sound?</p> <p>* Yes</p> <p>* No</p>	No
<p>Reason(s) not Sound</p> <p>* It is not positively prepared</p> <p>* It is not effective</p> <p>* It is not justified</p> <p>* It is not consistent with national policy</p>	
<p>Explanation</p>	<p>This site is a large mixed-use extension to the west of North Walsham. Whilst there are no designated heritage assets within the site, there are two grade II listed buildings to the west of the site at Bradmoor Farm and Stump Cross/Wayside Cross which lies to the east of the site and is a scheduled monument and grade II listed. Development of this site has the potential to impact upon the setting of these designated heritage assets.</p> <p>We welcome the preparation of a Heritage Impact Assessment in the Historic Environment Topic Paper. This provides robust evidence of the potential impact on the historic environment and suggests appropriate mitigation measures.</p> <p>The HIA sets out appropriate policy wording for inclusion in the Plan (see page 143).</p> <p>However, unfortunately this wording has not been included in the Plan. The policy needs amending to incorporate the wording from the HIA.</p> <p>We appreciate that criterion 6 of the policy does include some protection for the historic environment, but this falls short of the recommendations of the HIA.</p> <p>Although the precise location of the former battlefield is unknown, we understand that it is likely to be located to the south of the site. We understand that the masterplan is proposing open space /playing fields in the southern part of the allocation to help protect the battlefield and its setting. This requirement should be included in the policy.</p>
<p>Modifications requested</p>	<p>Amend criterion 6 to include the following wording from the HIA:</p> <p>Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area, including Bradmoor Farmhouse and Barns to the East of Bradmoor Farmhouse, which are Grade II Listed. Development should include the following mitigation measures, as shown on the masterplanning for the site as set out in the Regulation 19 Local Plan:</p> <p>Southern area of the site (Skeyton Road to Norwich Road)</p> <ul style="list-style-type: none"> • Retain and enhance hedgerow along Norwich Road (the south eastern boundary of the site) • Retain and enhance landscaping along the southern boundary of the site • Retain and enhance landscaping along the southern boundary of the site Middle of the site (Skeyton Road to Alysham Road) • Retain and enhance landscaping buffer along the Weaver's Way • Retain and enhance hedgerows along the western boundary of the site adjoining Tungate Road • Retain existing trees along Skeyton Road on the eastern boundary of the site. • Retain and enhance the landscape buffer along the northern area of the site to the north of Cromer Road where the site adjoins the railway track and existing residential properties to the east. • Landscape buffer / public open space around Bradmoor Farm cottages to retain where possible the sense of an isolated farm holding. • Retain and enhance hedgerow along Greens Road <p>In addition, add reference to open space/sports facilities in southern portion of site to protect battlefield site.</p>
<p>Appear at examination hearing session(s)?</p> <p>* No, I do not wish to participate in examination hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>Justification for appearing at hearing</p>	
<p>Attachment(s)</p>	
<p>Consultation Point Title</p>	Land West of North Walsham
<p>Consultation Point Number</p>	Policy NW62/A

Section of the Plan	Policy NW62/A Land West of North Walsham
ID	LPS706
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>Sound – Subject to project level HRA where appropriate</p> <p>In line with the plan's HRA, we recommend that a project level HRA and/or appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal.</p> <p>Priority habitats and species should also be considered to assess the impact of the development proposals on local wildlife, in line with paragraphs 175 and 176 of the NPPF.</p> <p>Site allocation NW62/A is of significant size and within 1km of Bryants Heath SSSI which is linked directly via a public footpath. Due to the lack of alternative green space in the area we would anticipate an increase recreational use of the designated site. To mitigate disturbance impacts, the proposal will require suitable onsite open space that is proportionate to the scale of the development and sufficient to absorb the routine recreational requirements for the anticipated number of residents (a country park or equivalent). In addition, this allocation should provide significant contributions to net gain and opportunities for habitat creation as in line with emerging Policy ENV 4. Historically, the land parcels adjacent to the site were heathland and recreation of this habitat could provide an extension and buffer to the SSSI, potentially supporting wildlife whilst integrating recreation. Natural England would welcome a conversation about net gain and GI opportunities.</p>
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of North Walsham
Consultation Point Number	Policy NW62/A
Section of the Plan	Policy NW62/A Land West of North Walsham
ID	LPS807
Response Date	07/03/2022 18:09:00
Name	
Organisation	Turley Planning

Agent Name	Mr Steve Kosky
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	<p>SEE ATTACHED FILE</p> <p>3.34 The emerging Local Plan proposes the allocation of two sites for residential development in North Walsham, including Land West of North Walsham (Site NW62/A) for the delivery of 1,800 homes, 460 units of specialist elderly accommodation (equivalent to 307 additional homes), and other uses including a 'link road'.</p> <p>3.35 However Pigeon again have significant concerns with regards to the delivery of this allocation.</p> <p>3.36 With regard to 'deliverability' the Plan explicitly states (para. 14.3.5):</p> <p><i>"The delivery of the site will be complex and may take a number of years to come to fruition. The majority of the site is currently being promoted for development by a single consortium comprising three separate land owners."</i></p> <p>3.37 The Plan additionally states (para. 14.3.6):</p> <p><i>"... The site (in part or whole) cannot be brought forward without the prior adoption of a comprehensive Development Brief and approval of a Design Code for the whole site. ..."</i></p> <p>3.38 Furthermore, the extended narrative of the policy, across three pages of the Plan, and the variety of significant infrastructure matters that it sets out, makes it clear that delivery of the site will be both complex and time consuming.</p> <p>3.39 Yet, despite all of this, the draft Plan includes (p. 266) a trajectory for Site NW62/A as set out in Table 2 (see Appendix 3) that envisages housing completions in 2026/27 – likely to be just three years after the (projected) adoption of the emerging Plan, with delivery reaching 100 dpa two years later and 160 dpa the year after.</p> <p>3.40 There is no indication as to the source of, or justification for, this trajectory, which shows 1,070 dwellings being delivered during the plan period, and a further 1,037 dwellings beyond 2036 (a total of 2,107 dwellings including the equivalent contribution from the specialist elderly accommodation).</p> <p>3.41 It is considered however that this is a heavily over optimistic projection. As noted above in relation to Site F01 (/A) in Fakenham, the larger the development site, the longer the planning process and lead-in time before dwellings are actually delivered.</p> <p>3.42 Generally speaking[SEE FOOTNOTE 3] (and noting the lack of other available detail), a proposal of 1,800 homes could take at least 5 or more years from the point an application is submitted to the point where the first homes are completed. In contrast, a proposal of 100 homes will take far less time to progress from the submission of an application to first completions – possibly as little as 2 to 3 years.</p> <p>3.43 This is again demonstrated by Site F01(/A) as discussed above, where housing delivery will not commence until some 24 years after the base date of the Plan that led to its allocation, 14 years after the site was allocated, and 8 years after the submission of the outline planning application.</p> <p>3.44 Factoring in 1 year from the projected adoption of the emerging Plan (April 2023) for pre-planning work, and 5 years to a grant of outline planning permission would mean that planning permission would not be granted on Site NW62/A until around April 2029.</p>

3.45 Allowing 1 further year for site works before homes actually start to be delivered (noting the significant infrastructure requirements) would result in the first homes being delivered in 2030/31, some 4 years later than projected.

FOOTNOTE 3 - See also 'Start to Finish', Lichfields, February 2020

3.46 Assuming such a 4-year slippage would result in Site NW62/A delivering 520 homes less than projected. This is considered to be an entirely reasonable prospect, and indeed a far more likely outcome than the projected trajectory set out in the Regulation 19 Plan.

3.47 In addition, and again generally speaking⁴, a proposal of 1,800 homes might only deliver 100 to 150 homes per year (as per the draft Plan housing trajectory), possibly less. In contrast, evidence suggests that a site of 100 homes could deliver 25 to 50 homes per year, and thus a few sites of around 100 homes could also deliver a total of 100 to 200 homes per year – at least the annual delivery rate of a single 'strategic' site, with a shorter lead-in time, greater flexibility and less risk.

3.48 In summary, it is considered that there remain significant concerns regarding the deliverability of the homes planned on Site NW62/A - the evidence suggests that it is likely that approximately 520 homes will not be delivered during the forthcoming plan period.

3.49 For these reasons the allocation for Land West of North Walsham (Site NW62/A) is also not positively prepared, justified, effective or consistent with National Policy.

Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	Appendix 3 - Projected Delivery from Sites F01 (A) and NW62 (A).pdf

Consultation Point Title	Sheringham
Consultation Point Number	15
Section of the Plan	15.0.1
ID	LPS25
Response Date	23/01/2022 15:45:17
Name	Mr David Hurdle
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not consistent with national policy
Explanation	There is no mention of the fact that Sheringham has no cycle paths. That is a clear deficiency so needs to be addressed.
Modifications requested	Identify the lack of cycle paths in Sheringham and how you will address that important deficiency.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

Policy SH04 Land Adjoining Seaview Crescent

Consultation Point Title	Land Adjoining Seaview Crescent
Consultation Point Number	Policy SH04
Section of the Plan	Policy SH04 Land Adjoining Seaview Crescent
ID	LPS612
Response Date	05/03/2022 15:52:00
Name	Mr Stephen Pegg
Organisation	Sheringham Town Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Sheringham Town Council (STC) agrees with the allocation of this site. STC believes the access for maintenance to Morley Hill is essential. The access should be wide enough to allow for heavy duty maintenance vehicles. The landowner/developer should pay for the access. The access should be completed BEFORE the commencement of other development on site. A formal legal deed granting the access to Morley Hill will be required and the landowner/developer should pay for this.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land Adjoining Seaview Crescent
Consultation Point Number	Policy SH04
Section of the Plan	Policy SH04 Land Adjoining Seaview Crescent
ID	LPS707
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met?	Yes

* Yes	
* No	
Do you consider the plan to be Sound?	Yes
* Yes	
* No	
Reason(s) not Sound	
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	<p>Sound - Subject to project level HRA.</p> <p>The policy supports residential developments which may result in an increase in recreational use of designated sites. In line with the plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, environmental net gain and provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal.</p> <p>This policy is also located within or in close proximity to the Norfolk Coast AONB. Due consideration should be taken to determine any adverse effects on the special qualities of the protected landscape.</p>
Modifications requested	
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Policy SH07 Former Allotments, Weybourne Road, Adjacent to The Reef

Consultation Point Title	Former Allotments, Weybourne Road, Adjacent to The Reef
Consultation Point Number	Policy SH07
Section of the Plan	Policy SH07 Former Allotments, Weybourne Road, Adjacent to The Reef
ID	LPS533
Response Date	07/03/2022 17:00:00
Name	Mr David Williams
Organisation	PSK Building Surveyors Ltd
Agent Name	Mr Alastair Curran
Agent Organisation	Planning Places Ltd
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified; It is not consistent with national policy
Explanation	<p>The allocation of land SH07 is considered not justified based on missing evidence. Site Weybourne Road (Weybourne Road Sheringham, Site Location Plan) has not been considered by the Council, despite being submitted for consideration in the call for sites and at Regulation 18 stage.</p> <p>The site was not included in the first Draft Local Plan (Part 1) Alternatives Considered document, which lists the sites considered for allocation. As such, SH07 was allocated without considering the alternatives submitted, and therefore the allocation has been made without consideration of all pertinent evidence and is not justified.</p> <p>Allocation of land SH07 would result in the loss of valuable public open space (the allotments), in conflict with Paragraph 99 of the NPPF which clearly states public open spaces should not be built on except in specific circumstances.</p> <p>The allocation would result in the western urban boundary of Sheringham erode into the open countryside and see the current soft edge of the allotments turn into a more physical boundary of hard urban development.</p> <p>Additionally, valuable ecological wildlife habitats would be lost. Due to the diverse nature of these habitats, they would be difficult to replace, making a net gain for biodiversity, as required by Paragraph 174 of the NPPF, difficult to achieve. As such, Policy SH07 is not consistent with national policy.</p> <p>Site Weybourne Road (Weybourne Road Sheringham, Site Location Plan) would allow development within the existing settlement boundary, on brownfield land, as encouraged by Paragraph 120 of the NPPF. Site Weybourne Road (Weybourne Road Sheringham, Site Location Plan) could also facilitate a new access from the south of Sheringham to the Reef Leisure Centre, without walking a long 'L' shape on Holt Road and Weybourne Road. Encouraging a healthier lifestyle for local and new residents in line with Section 8 of the NPPF.</p> <p>Therefore, the consideration, and potential allocation of site Site Weybourne Road (Weybourne Road Sheringham, Site Location Plan) would be consistent with national policy and justified.</p>
Modifications requested	The site known as Weybourne Road needs considering as an option for allocation, as per its submission at Reg18 and before. Once this site has been considered, then a justified allocation can be determined.

	Additionally, the allocation of SH07 is considered to be in conflict with the NPPF through the allocation of POS for development, especially in light of other brownfield land and better quality land being available for development around and within Sheringham.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	It would be useful to talk through the missed site, its benefits, and why this would make a valuable allocation within Sheringham. Equally, the allocation of SH07 needs consideration, especially as a valuable area of public open space would be lost by the proposal.
Attachment(s)	20220307 - Site Location Plan Sheringham.pdf
Consultation Point Title	Former Allotments, Weybourne Road, Adjacent to The Reef
Consultation Point Number	Policy SH07
Section of the Plan	Policy SH07 Former Allotments, Weybourne Road, Adjacent to The Reef
ID	LPS737
Response Date	28/02/2022 08:14:00
Name	Mrs Debbie Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	We welcome criteria 1 and 2.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Former Allotments, Weybourne Road, Adjacent to The Reef
Consultation Point Number	Policy SH07
Section of the Plan	Policy SH07 Former Allotments, Weybourne Road, Adjacent to The Reef
ID	LPS708
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	

Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>Sound - Subject to project level HRA.</p> <p>The policy supports residential developments which may result in an increase in recreational use of designated sites. In line with the plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, environmental net gain and provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal.</p> <p>This policy is also located within or in close proximity to the Norfolk Coast AONB. Due consideration should be taken to determine any adverse effects on the special qualities of the protected landscape.</p>
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Consultation Point Title	Land South of Butts Lane
Consultation Point Number	Policy SH18/1B
Section of the Plan	Policy SH18/1B Land South of Butts Lane
ID	LPS180
Response Date	24/02/2022 09:43:47
Name	Miss Naomi Chamberlain
Organisation	Norfolk County Council (Landowner)
Agent Name	
Agent Organisation	NPS Property Consultants
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified; It is not consistent with national policy
Explanation	<p>SEE ATTACHED FILE</p> <p>NPS Property Consultants previously objected to land south of Butts Lane, Sheringham (SH18/1B) on the grounds that the site is located within an Area of Outstanding Natural Beauty, it forms part of the setting of Sheringham Park and would have a greater impact upon an important landscape area in comparison to land off Nelson Road. NNDC has now accepted that this is in a sensitive location. However, in response to the NPS comments on the Reg 18 Local Plan (see attached) (along with Historic England and Norfolk Wildlife Trust), NNDC has only sought to strengthen the site allocation policy to promote careful design, layout, and landscaping (see page 757 Consultation Statement) which would not address the significant impact on important designations. These considerations should have been properly weighed earlier by NNDC through the site allocation process and a less constrained site identified in relation to environment designations along with access considerations. Land off Nelson Road is such a site.</p> <p>NPS Property Consultants therefore requests that land off Nelson Road SH16/1 be considered more fully and allocated for development (in place of the preferred site, land South of Butts Lane, Sheringham (SH18/1B)) so that the site allocations can be justified, effective and the plan is sound.</p>
Modifications requested	<p>SEE ATTACHED FILE</p> <p>NPS Property Consultants would request land off Nelson Road SH16/1 be allocated for development (in place of the preferred site land South of Butts Lane, Sheringham SH18/1B).</p> <p>NPS Property Consultants consider that the site is well located to accommodate development for housing, offering potential for specialist housing / supported living and / or market housing and / or affordable housing. It does not appear that the additional / previous justification for the development of this land off Nelson Road has been fully considered by NNDC. The consultation document response on page 861 of the Consultation Statement states that the comments are noted, and the site has been assessed as part of potential sites for Sheringham and is not a preferred site. However, the site has fewer environmental constraints and better access than the preferred site at Land South of Butts Lane.</p> <p>A more detailed consideration of the land off Nelson Road SH16/1 need to be undertaken and the site allocated for development so that</p>

	the proposed site allocations for Sheringham can be justified, effective to ensure the plan is sound.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	We wish to reserve the right to appear at the Examination to help justify the inclusion of land off Nelson Road SH16/1 as a preferred site for development, if required.
Attachment(s)	NPS Response to SH181B Reg 18.docx
Consultation Point Title	Land South of Butts Lane
Consultation Point Number	Policy SH18/1B
Section of the Plan	Policy SH18/1B Land South of Butts Lane
ID	LPS512
Response Date	07/03/2022 22:32:00
Name	Mr Mike Jones
Organisation	Norfolk Wildlife Trust
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	This allocation would extend the settlement directly into the wider countryside, placing housing in direct proximity to woodland.
Modifications requested	Due to its proximity to woodland, we recommend that the policy text is revised to ensure that there is an appropriate stand-off distance, of at least 20m, between any new built development and the woodland, to avoid direct impacts from construction, proximity to gardens and to minimise noise and light pollution into the woodland. As mitigation, we would also recommend additional vegetation screening between any housing and the woodland, either as new planting or preferably through allowing natural recolonization of a buffer strip from the existing woodland.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land South of Butts Lane
Consultation Point Number	Policy SH18/1B
Section of the Plan	Policy SH18/1B Land South of Butts Lane
ID	LPS738
Response Date	28/02/2022 08:14:00
Name	Mrs Debbie

	Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>This sensitive site is located within the Upper Sheringham Conservation Area. Any development therefore has the potential to impact upon the Conservation Area. The site is also located within the defined setting of Sheringham Park.</p> <p>We do however note the wooded setting to the south and residential development to the north. With careful design, layout and landscaping some development may be acceptable of this site.</p> <p>We welcome the preparation of a Heritage Impact Assessment in the Historic Environment Topic Paper. This provides robust evidence of the potential impact on the historic environment and suggests appropriate mitigation measures.</p> <p>The HIA sets out appropriate policy wording for inclusion in the Plan (see page 168).</p> <p>However, unfortunately this wording has not been included in the Plan. The policy needs amending to incorporate the wording from the HIA.</p> <p>We appreciate that criteria 1-3 of the policy does include some protection for the historic environment, but this falls short of the recommendations of the HIA. We suggest you revisit the wording ensuring that the recommendations of the HIA are more closely reflected in the policy.</p>
Modifications requested	<p>Amend policy wording to incorporate the following:</p> <p>Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area, including the Upper Sheringham Conservation Area. Development should include the following mitigation measures (as set out in further detail in the Heritage Impact Assessment):</p> <ul style="list-style-type: none"> • Lower density dwellings on the north and the western extents of the site • Retain landscaping on the northern boundary of the site • Significant landscaping along the boundary of the west of the site to the east of the public right of way • Single storey dwellings on the west of the site to respect the wider landscape • Ensure development does not result in the loss of trees beyond the site boundary to the south of the site • Respect the significance of the Upper Sheringham Conservation Area
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land South of Butts Lane
Consultation Point Number	Policy SH18/1B
Section of the Plan	Policy SH18/1B Land South of Butts Lane
ID	LPS709

Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Sound - Subject to project level HRA. The policy supports residential developments which may result in an increase in recreational use of designated sites. In line with the plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, environmental net gain and provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal. This policy is also located within or in close proximity to the Norfolk Coast AONB. Due consideration should be taken to determine any adverse effects on the special qualities of the protected landscape.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

16 Stalham

Consultation Point Title	Stalham
Consultation Point Number	16
Section of the Plan	16 Stalham
ID	LPS754
Response Date	07/03/2022 17:49:00
Name	Mr John Clementson
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Any changes to the boundary line would severely represent an over development of the area which is already reaching saturation point with the planned building works and the infrastructure of the town. Any additional buildings outside of the current boundary and in the countryside would also start to destroy the wildlife - which is there for everyone to enjoy - especially as there are a number of SSSI's close by together with the close proximity of the broads national park. We need to protect what we have not only for the local residents but also for the many visitors who visit the area to see our wildlife and the natural habitat they live in. Not only would this over develop the area but in doing so will adversely alter the character of North Norfolk and in particular the Stalham area.
Modifications requested	We urge that under no circumstances you consider changing the development boundary in the Stalham area. The council are currently achieving their target number of housing supply so there is no reason to change the boundary lines and encourage further unnecessary development.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Stalham
Consultation Point Number	16
Section of the Plan	16 Stalham
ID	LPS753
Response Date	07/03/2022 21:01:00
Name	Ms Melanie Titmus
Organisation	
Agent Name	

Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	It is vital that we protect the green open spaces and green network of public footpaths in our parish together with our untouched green rural leafy locations that not only all of our residents enjoy everyday but also for the many visitors we have to the area. We all benefit from the physical, emotional feelings and wellbeing from being outdoors and seeing the wildlife in their natural habitat. We need to protect our wildlife and especially the fens and county wildlife sites and as such we must work with the private landlords to ensure they understand their obligations to provide a natural habitat for them to protect enhance and encourage them to flourish. Under no circumstances are there to be any buildings or development of any kind on these sites as they contain protected habitat and are often adjacent to triple SSSI areas and national parks.
Modifications requested	The council is over delivering on its housing targets so there is no need to build in the "countryside" and outside of the development areas. We need to ensure that we keep our small villages and towns segregated and not over develop so they all merge into one losing there uniqueness and individual characteristics. We are in danger of doing this if we expand our development boundaries further. Therefore it is vital for our parish and the character of the area that our development boundaries are not widened as this will encourage building works that are not necessary.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Consultation Point Title	Land Adjacent Ingham Road
Consultation Point Number	Policy ST19/A
Section of the Plan	Policy ST19/A Land Adjacent Ingham Road
ID	LPS711
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>Sound – Subject to project level HRA.</p> <p>This policy supports residential developments which may result in an increase in recreational use of designated sites.</p> <p>This allocation will also feed into the Broads SAC, Broadland SPA and Ramsar. Due to phosphate concerns, as detailed in the Site Improvement Plan, Natural England agrees that a Foul Water Drainage Strategy, as well as the enhancement of sewage infrastructure to deal with such concerns, should be undertaken before the development proposal proceeds. Furthermore, a project level HRA should also take place to determine no likely significant effects, both hydrological and recreational, of the development on the protected sites.</p> <p>The allocation is also located on Grade 1 agricultural land. In line with paragraphs 174 and 175 of the NPPF, and SA1 of the Sustainability Appraisal, we recommend that any potential significant implications of the development proposals are also considered at the project level.</p>
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Consultation Point Title	Land North of Yarmouth Road, East of Broadbeach Gardens
Consultation Point Number	Policy ST23/2
Section of the Plan	Policy ST23/2 Land North of Yarmouth Road, East of Broadbeach Gardens
ID	LPS317
Response Date	07/03/2022 13:19:59
Name	Barry Lancaster
Organisation	
Agent Name	Mr Ian Reilly
Agent Organisation	Lanpro
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective
Explanation	Positively prepared The allocation ST23/2 does not include or have a requirement to provide access to the land at Edgefield, Yarmouth Road. This potentially creates a scenario where a parcel of land within the development limits of the settlement will be restricted in the quantum of dwellings that could be provided. Effective The allocation fails to make the most of the opportunities that could be gained from developable land. Edgefield's exclusion from the policy or lack of formal connection requirement will reduce the effectiveness of the Local Plan to deliver the greatest number of homes possible in the most sustainable locations.
Modifications requested	Lanpro have been appointed by Barry Lancaster to make comment on the draft policy ST23/2. Mr Lancaster is the owner of land which is placed centrally to allocation but omitted from it. The land owned by our client is identified as Edgefield, Yarmouth Road, Stalam. The plot contains one dwelling on its southern aspect and extensive garden grounds to the north beyond the house. We would suggest that excluding the current dwelling the site could provide for circa 8 further dwellings. The purpose of this submission is not to object to the principle of the allocation of site ST23/2 but to provide some suggestions on the policy text. We consider that these suggestions would ensure that the policy is sound for adoption. The landowner has engaged with the Council previously and been advised that his land is in a sustainable location and that it would be preferable for him to obtain a road link to the adjoining allocation for a new development on his land; rather than to access Yarmouth Road directly from his site. We consider that the provision of an access for development on his site can technically be obtained through his existing road connection to Yarmouth Road. However, in the interests of proper planning we would suggest that the Policy wording for ST23/2 should include for a provision of a formal link. Given that the land at Edgefield will be surrounded by development we believe that it is appropriate that the developer of allocation Policy ST23/2 should provide for a road connection, to adoptable standard,

	<p>to the boundary of our clients land; and that this connection be provided unhindered by any financial obligation to the developer.</p> <p>We can confirm that our clients land is available and deliverable and given the surrounding land use allocation, it might be appropriate for the allocation to include the land to the rear of Edgefield.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land North of Yarmouth Road, East of Broadbeach Gardens
Consultation Point Number	Policy ST23/2
Section of the Plan	Policy ST23/2 Land North of Yarmouth Road, East of Broadbeach Gardens
ID	LPS739
Response Date	28/02/2022 08:14:00
Name	Mrs Debbie Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>Whilst there are no designated heritage assets within this site, the site lies adjacent to Stalham Conservation Area. There are two grade II listed buildings, Church Farmhouse and stable block to the west of the site as well as the grade II* listed Stalham Hall and two associated grade II listed buildings (barn and Stewards House) to the east of the site. Development of the proposed allocation would mean that Church Farm is severed from the surrounding rural landscape and the historical connection between the buildings and land would be lost. Development would also impact upon the setting of the Conservation Area, Stalham Hall and other listed buildings in the area.</p> <p>The relationship between some parts of the historic village core and the fields around it have already been affected by modern development but the allocation site is important because it maintains that link and is a positive element of the setting of the conservation area.</p> <p>We had previously expressed strong reservations about the site and suggested an HIA be undertaken to explore the issues.</p> <p>We welcome the preparation of a Heritage Impact Assessment in the Historic Environment Topic Paper. This provides robust evidence of the potential impact on the historic environment and suggests appropriate mitigation measures. These help to overcome our previous concerns about the site.</p> <p>The HIA sets out appropriate policy wording for inclusion in the Plan (see page 187).</p> <p>However, unfortunately this wording has not been included in the Plan. The policy needs amending to incorporate the wording from the HIA.</p> <p>We appreciate that criterion 7 and 9 of the policy does include some protection for the historic environment, but this falls short of the recommendations of the HIA. In particular the policy should make clear</p>

	<p>that the open space should be provided on the south eastern portion of the site to provide a buffer for Stalham Hall.</p> <p>In addition, the Key Development Considerations diagram on page 334 of the Historic Environment Paper should be included in the Plan. The diagram shows the heritage mitigation measures proposed for the site.</p>
Modifications requested	<p>Amend criterion 7 and 9 to read:</p> <p>Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area, including the Stalham Conservation Area, the Stable Block, Church Farmhouse, the barn at Stalham Hall Farm and the Stewards House, all Grade II Listed and Stalham Hall, Grade II* Listed. Development should include the following mitigation measures (as set out in further detail in the Heritage Impact Assessment):</p> <p>Western Boundary of the site:</p> <ul style="list-style-type: none"> • A significant landscape buffer will be required along the western part of the proposed allocation to mitigate against potential impact upon the Conservation Area and nearby listed buildings. • Development on the western part of the site should be of a lower density/ single storey development. <p>Eastern Boundary of the site:</p> <ul style="list-style-type: none"> • A landscape buffer will be required along the eastern part and boundary of the site to mitigate against potential impact upon the nearby listed Stalham Hall. • Open space to be provided on the eastern part of the site to ensure the impact upon Stalham Hall is mitigated. <p>Northern Boundary of the site:</p> <ul style="list-style-type: none"> • Strong landscaping along the northern boundary to ensure a rural edge to the settlement • Lower density/ single storey dwellings on the northern part of the site <p>Include diagram from HIA in Local Plan.</p>
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land North of Yarmouth Road, East of Broadbeach Gardens
Consultation Point Number	Policy ST23/2
Section of the Plan	Policy ST23/2 Land North of Yarmouth Road, East of Broadbeach Gardens
ID	LPS712
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	Yes
* Yes	
* No	
Has the duty to cooperate been met?	Yes
* Yes	
* No	
Do you consider the plan to be Sound?	Yes
* Yes	
* No	
Reason(s) not Sound	
* It is not positively prepared	
* It is not effective	
* It is not justified	

* It is not consistent with national policy	
Explanation	<p>Sound – Subject to project level HRA</p> <p>This policy supports residential developments which may result in an increase in recreational use of designated sites.</p> <p>This allocation will also feed into the Broads SAC, Broadland SPA and Ramsar. Due to phosphate concerns, as detailed in the Site Improvement Plan, Natural England agrees that a Foul Water Drainage Strategy, as well as the enhancement of sewage infrastructure to deal with such concerns, should be undertaken before the development proposal proceeds. Furthermore, a project level HRA should also take place to determine no likely significant effects, both hydrological and recreational, of the development on the protected sites.</p> <p>The allocation is also located on Grade 1 agricultural land. In line with paragraphs 174 and 175 of the NPPF, and SA1 of the Sustainability Appraisal, we recommend that any potential significant implications of the development proposals are also considered at the project level.</p>
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

17 Wells-next-the-Sea

Consultation Point Title	Wells-next-the-Sea
Consultation Point Number	17
Section of the Plan	17
ID	LPS115
Response Date	19/02/2022 17:48:03
Name	Dr Victoria Holliday
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	There is concern in Coastal Ward that this housing will become second or holiday homes.
Modifications requested	Place a primary residence restriction on those market homes.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Wells-next-the-Sea
Consultation Point Number	17
Section of the Plan	17.02
ID	LPS182
Response Date	23/02/2022 15:09:05
Name	Greg Hewitt
Organisation	Wells Town Council
Agent Name	Andrea Long
Agent Organisation	Compasspoint Planning and Rural Consultants
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared	It is not justified

<ul style="list-style-type: none"> * It is not effective * It is not justified * It is not consistent with national policy 	
Explanation	<p>Objection 1: Visitor Traffic – Plan is not fully ‘Justified’</p> <p>Para 17.02 (page 231) of the Local Plan needs to be recast to include reference to the considerable problems experienced by the town during the summer months but also at weekends. Problems arise from the inflow of traffic from the east, west and south, which frequently results in gridlock along arterial entrances to the town, visitor parking in residential streets, (often illegally and at much inconvenience to residents), and danger from the potential inability of emergency vehicles to gain access as well as blocking bus routes.</p> <p>As currently worded the paragraph does not reflect accurately the traffic issues experienced in the town due to visitor traffic, it does not take into account appropriate evidence and is therefore not justified.</p>
Modifications requested	<p>Para 17.02 (page 231) of the Local Plan needs to be recast to include reference to the considerable problems experienced by the town during the summer months but also at weekends. Problems arise from the inflow of traffic from the east, west and south, which frequently results in gridlock along arterial entrances to the town, visitor parking in residential streets, (often illegally and at much inconvenience to residents), and danger from the potential inability of emergency vehicles to gain access as well as blocking bus routes.</p>
Appear at examination hearing session(s)? <ul style="list-style-type: none"> * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s) 	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	Wells Town Council would like the opportunity to make its position clear in person.
Attachment(s)	
Consultation Point Title	Wells-next-the-Sea
Consultation Point Number	17
Section of the Plan	17.09
ID	LPS185
Response Date	23/02/2022 15:21:08
Name	Greg Hewitt
Organisation	Wells Town Council
Agent Name	Andrea Long
Agent Organisation	Compasspoint Planning and Rural Consultants
Do you consider the plan to be Legally Compliant? <ul style="list-style-type: none"> * Yes * No 	Yes
Has the duty to cooperate been met? <ul style="list-style-type: none"> * Yes * No 	Yes
Do you consider the plan to be Sound? <ul style="list-style-type: none"> * Yes * No 	No
Reason(s) not Sound <ul style="list-style-type: none"> * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy 	It is not effective; It is not justified
Explanation	<p>Para 17.09 (page 232) The Shoreline Management Plan proposed that Wells should be a Hold-the-Line settlement. Cromer and Sheringham are mentioned as in need of consideration in this regard. Wells should also be considered as being at even greater flood risk than either of the above. Mention is made in 17.0.9 is of ‘residual risk should defences fail’ but not of substantial risk to the main quay and east quay together with the coastal footpath (national trail) that runs along them. These are not protected by the flood barrier and flooding occurs when the combined tide level and surge level exceeds 4.1m</p>

	AOD - a level which is likely to be achieved more frequently in the future. When the barrier is closed at the western end of the quay, vehicular traffic along the quay in both directions is blocked for at least 2 hours. The only access to properties at the Main Quay and East Quay is from the northern, seaward side.
Modifications requested	Para 17.0.9 needs to be amended to refer to the risk to the Quay and the east end in order to be justified. Consideration should be given to creating access corridors to the affected properties as outlined above from the south side as part of mitigation measures for sea level rise.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	Wells Town Council wishes the opportunity to amplify its points and clarify any others in person
Attachment(s)	
Consultation Point Title	Wells-next-the-Sea
Consultation Point Number	17
Section of the Plan	17.2.4
ID	LPS188
Response Date	23/02/2022 15:30:20
Name	Greg Hewitt
Organisation	Wells Town Council
Agent Name	Andrea Long
Agent Organisation	Compasspoint Planning and Rural Consultants
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	The Town Council considers that the Local Plan fails to include an adequate or specific definition of affordable housing. Given the price of housing in Wells (£415,000 HNA 2020 (average) ; £470,000 ONS (median) 2022) and the average wage (£38,550 HNA) affordable housing for sale is an illusion. The HNA contends that a household with an average income could afford to buy a house for £180,000. No houses for sale at or near that price exist in Wells. The unique condition of the town as a substantial coastal settlement with good access from the south and good facilities on which housing pressure from incomers is at a very high-level demands more detailed consideration and provision. As written the Local Plan fails to take into account all relevant evidence and is therefore neither justified nor effective.
Modifications requested	Para 17.2.4 is completely inapplicable to Wells and should be amended to reflect a more realistic position for Wells.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	Wells Town Council would appreciate to make and amplify its points in person

Attachment(s)	
Consultation Point Title	Wells-next-the-Sea
Consultation Point Number	17
Section of the Plan	17.05 to 17.07
ID	LPS184
Response Date	23/02/2022 15:18:20
Name	Greg Hewitt
Organisation	Wells Town Council
Agent Name	Andrea Long
Agent Organisation	Compasspoint Planning and Rural Consultants
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	Paras 17.05-17.07 (page 232) - The Wells section makes references to infrastructure to deal with the effects of additional housing made through specific allocations. However no reference is made in this section of the severe wider problems arising from tourism. Nor is there any engagement with the Natural England report which recommended a reduction in the amount of off-street parking. NCA Profile: 77 North Norfolk Coast 2013, which is a key piece of evidence that does not appear to be given appropriate reference or weight. The Local Plan should make clear references to the Natural England report and its implications for the future planning of the town; the plan is not justified if it either omits or does not take proper account of relevant evidence
Modifications requested	The Local Plan should make clear references to the Natural England report and its implications for the future planning of the town; the plan is not justified if it either omits or does not take proper account of relevant evidence.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	Wells Town Council would appreciate the opportunity to amplify its points in person.
Attachment(s)	
Consultation Point Title	Wells-next-the-Sea
Consultation Point Number	17
Section of the Plan	Open Land Area (Mill Road Allotments)
ID	LPS190
Response Date	23/02/2022 15:38:27
Name	Greg Hewitt
Organisation	Wells Town Council
Agent Name	Andrea Long

Agent Organisation	Compasspoint Planning and Rural Consultants
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified; It is not consistent with national policy
Explanation	This site is shown as Open Land Area. The designation of Open Land Area appears to be a bespoke designation and it is unclear what it is designed to achieve and what added value it brings in addition to the Local Green Space Designation. The Town Council objects to this area being identified as an open land area and instead proposes to investigate the potential for it to be a rural exception site seems, given the conditions under which it would be permitted, to meet the stated desires and needs of the local community. The lower part of the West End paddock might fulfil those requirements.
Modifications requested	The Open Land Area designation should be removed from this site as it is unclear what purpose the designation serves generally but here specifically. Instead the site can be identified as a potential site for Community Led Development.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	Wells Town Council would appreciate the opportunity to make and amplify its points in person.
Attachment(s)	
Consultation Point Title	Wells-next-the-Sea
Consultation Point Number	17
Section of the Plan	Policy W07/1, section 17.2 and para.17.0.1-17.0.7
ID	LPS152
Response Date	24/02/2022 16:31:16
Name	Mr. John Edwards
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified; It is not consistent with national policy
Explanation	The Policy W07/1 and section 17.2 are unjustified and unsound as insufficient weight is given to the purposes of:

- Policy ENV 1,
- Policy ENV 2, and
- Policy ENV 3,

and to:

- Urban form,
- Ineffective access,
- Impact on Mill Farm, and
- Housing Mix.

Para. 17.0.1-17.0.7: are unjustified and ineffective as they omit reference to the specific housing needs of Wells and omit the logic for site selection.

Modifications requested

The site subject to Policy W07/1 is the most elevated and prominent undeveloped site in Wells in relation to the Area of Outstanding National Beauty and the associated ecologically and environmentally designated sites to the north. As such, it is a very significant intrusion on the open aspect of the area to the north and west of the Town.

The Policy W07/1 is unjustified in that insufficient weight is given to:

- Policy ENV 1: the site proposed in Policy W07/1, which is within the setting of the AONB, does not 'conserve and enhance' the valued landscape, or contribute to the matters included in section 4 a-c and f. Further, as it has a 'potential adverse impact on the local landscape character' (section 5) and in the event it is included in the Approved Local Plan, the development should be informed by a Landscape and Visual Impact Assessment,
- Policy ENV 2: there is no justification that it will protect, conserve and enhance the Landscape Character, the distinctive settlement character, the visually sensitive skyline and the views into and from the AONB as required by the policy. As referred to in Policies ENV 1 and 2, W07/1 is unjustified as insufficient weight has been given to the unavoidable impact of the proposed development on the matters highlighted in para. 3.13.8 and 3.13.9, particularly on dark night skies. This site, given its prominence on the landscape and skyline, will be a major nighttime intrusion.
- Policy ENV 3: as W07/1 is north of the A149 shown as the boundary of the Heritage and Undeveloped Coast, the proposed policy is unjustified in that the development fails to demonstrate both that it requires 'a coastal location and will not be significantly detrimental to the open coastal character.' (Planning application PF/17/2168 refers to the area being in the 'Undeveloped Coast Area).
- W07/1 represents a major visual intrusion of the built-up area of Wells into open countryside without the benefit of a clearly defined boundary. Westfield Avenue to the east of the proposed development currently provides a hard boundary to the Town; however, the boundary to the north of W07/1 is poorly defined and arbitrary. It opens the possibility to subsequent further development to the north and west; this is a significant consequence of the current proposal for the urban footprint of the Town for which no justification or acknowledgement is presented. The existing 1930's ribbon development is an intrusion into the open aspect at the western edge of Wells when viewed from the north but, while it already exists, it has matured and is largely assimilated into the landscape. The reinforcement of this earlier intrusion by the implementation of Policy W07/1 is unjustified and damaging to this sensitive environment. This was recognised in the protracted considerations of planning applications for 106, Mill Road (PF16/0508 and PF17/2168 refer) on what was described as, albeit much smaller, a 'sensitive' site in relation to, inter alia, the AONB.
- Access: the use of the access as proposed in W07/1 is unjustified without a survey of traffic flows in Wells and in particular on the B1105 and the A149. the access is taken from a section of the A149 which is subject to significant traffic, partly as a consequence of the Holkham Estate recreational activities, and is subject to gridlock several times a year, most notably on public holidays, when no vehicular access to the road is possible for the properties fronting Mill Road. Further, the viability of the site will be affected by the length of the new access road before it reaches the housing. This will further adversely impact on the cost of the market housing, given the relatively low density proposed; the resultant increased cost will move the market housing further away from the needs of the present community.
- Mill Farm: Policy W07/1 would remove the touring caravan/tenting site, and reduce the only and much used livery facilities for

	<p>residents and visitors, both facilities form a significant niche part of the Wells offer. It is understood that this would also have a significant impact on the viability of the farm unit.</p> <ul style="list-style-type: none"> Housing mix: notwithstanding the objections to the development of the site and the unjustified proposed policy, the proposal includes 50 residential units on the 2 ha. site; given the standard split, there would be 18 affordable units and 32 open market units. Using the 'urban' density of the Local Plan base calculations for the affordable units would mean the open market housing being developed at 20 units per hectare. Housing of this type, on this prominent site, will not address housing need in Wells and district as identified in the Housing Needs Assessment: Wells, Holkham, Walsingham, Warham and Wighton March 2021 (previously supplied to NNDC), nor meet the aspirations of Wells residents as expressed in the public consultation on the developing Neighbourhood Plan held in October 2021 (Report previously supplied). Para.17.0.1-17.0.7: this section 17 on Wells-next-the-Sea is unjustified and ineffective by the omission of two critical factors creating the stress in the housing market in the Town and district: <ul style="list-style-type: none"> the median house price is the highest in the North Norfolk District, and double the overall District level (£530,000 c/f £250,000 ONS March 2020), the level of second and holiday home ownership is up to 4 times higher in the Wells district compared to the overall District level; recent studies suggest it is approaching 40% of the housing stock. Because of their omission, the Local Plan provides no context or policy framework for the Neighbourhood Plan to address the challenges the Town faces with regard to the provision of housing. Further, section 17 provides no logic for its site selection, and residential allocation; an analysis of the topography of the Town would have highlighted the significance of the ridge running west-east from the high point in Mill Road through the centre of Town and along Northfield Waye. Development to the south of this ridge would protect the integrity of the AONB and the associated designated reserves/sites. There are alternative possibilities, previously considered, that provide more appropriate solutions, e.g. west of Two Furlong Hill, or south of the A149 and Warham Road.
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	The issues raised above are complex and significant, including visual aspects.
Attachment(s)	
Consultation Point Title	Wells-next-the-Sea
Consultation Point Number	17
Section of the Plan	Section 17 Generally
ID	LPS183
Response Date	23/02/2022 15:15:01
Name	Greg Hewitt
Organisation	Wells Town Council
Agent Name	Andrea Long
Agent Organisation	Compasspoint Planning and Rural Consultants
<p>Do you consider the plan to be Legally Compliant? * Yes * No</p>	Yes
<p>Has the duty to cooperate been met? * Yes * No</p>	Yes
Do you consider the plan to be Sound?	No

* Yes	
* No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	Objection 2: Omission: Traffic Survey and Policy dealing with increasing traffic - Plan is not justified or effective Section 17 of the Local Plan should mention the road network as part of the infrastructure. Consideration needs to be given to traffic flows into Wells via the A149 and the B1105 and the impact of the proposed road improvements around Fakenham. The Town Council recommends that a traffic survey be undertaken prior to the provision of a policy which deals with the increasing traffic demands relating to the town. In particular, the existing off-street, car parks both public and private are inadequate to the task. Without the inclusion of specific traffic survey evidence, the Local Plan is not fully justified or effective.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	Wells Town Council would like to contribute to the hearings in person to bring their local knowledge.
Attachment(s)	
Consultation Point Title	Wells-next-the-Sea
Consultation Point Number	17
Section of the Plan	17 Wells-next-the-Sea
ID	LPS399
Response Date	07/03/2022 12:15:41
Name	
Organisation	Holkham Estate
Agent Name	Mr Garth Hanlon
Agent Organisation	Savills (UK) Limited
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	SEE ATTACHED FILE Savills (UK) Limited is instructed by the Holkham Estate to make the necessary and relevant representations to the Regulation 19 version of the Local Plan for North Norfolk. As a major landowner within the District, it is important to engage with the Development Plan process and as such, the representations are submitted to ensure that the Plan is positively prepared, justified, effective and consistent with national policy within the NPPF. This representation on behalf of the Estate comments upon car parking provision specifically in Wells next the Sea.

Policy HC7 within the Regulation 19 version of the Plan states that development proposals which would result in the loss of public car parking facilities which make an important contribution to local parking provision will not be permitted. The Estate strongly supports this policy. This issue is particularly relevant to the issue of parking within Wells where the Estate is the largest provider of car parking.

Further, the Estate requests that the Overflow Field site to the west of Beach Road currently used for seasonal car parking should be allocated in the Local Plan for this use.

The Overflow Field car park has become an indispensable part of the provision of car parking in Wells since it came into use, initially on an adjacent field in 2007 before being relocated to the current field in 2015.

It is the only feasible solution to meet the seasonal spikes in demand for car parking at Wells from visitors prompted by hot sunny weather to visit the town and beach. On the rare occasions when it has been unavailable on a peak day (e.g. due to poor ground conditions) the town has experienced unacceptable levels of inconsiderate, unlawful and/or unsafe parking in the town, in driveways and on roadside verges. Park & Ride is not a viable option in Wells.

It is entirely appropriate in such circumstances for the Local Plan to support the indefinite provision of seasonal parking on the Overflow Field since it is absolutely vital that it remains appropriate for public parking to ensure the town can function as a safe and attractive place to visit.

The Estate has worked closely and successfully with Wells Town Council to agree strategies for parking and traffic management. The Estate has invested in measures arising from these strategies to direct inbound visitor traffic, as far as possible, to avoid The Quay area having regard to its use by pedestrians and thus raising issues of public safety and pollution.

Wells Town Council supports the continuing and uninterrupted use of the Overflow Field for seasonal car parking. (**see Appendix 1**)

The importance of Wells in the context of tourism is acknowledged by the Council and paragraph 17.0.2 within the Regulation 19 Plan states that Wells has a thriving tourism industry that supports the economic vitality of the town. The Estate acknowledges the importance of tourism and will continue to review and assess the capacity and effectiveness of the connectivity between the Town and the Beach over the coming years. In this context a new “electric” shuttle bus route is a first step towards increasing the capacity and delivering passengers more effectively to the Beach arrival point.

It is the case that the Council have granted temporary planning permission for the Overflow Field as car parking during the seasonal period of the year but have more recently recommended against an application by the Estate to establish indefinite seasonal use of the Overflow Field for car-parking. This has left this matter somewhat in limbo. For reasons set out above, it is important that certainty is provided to the Estate and to Wells town as to the continuing use of the Overflow Field during the seasonal period (1st March – 31st October). It is considered that the site should be allocated for seasonal car parking use together with new text to be added in to Chapter 17 of the Local Plan at paragraph 17.0.2 as relates to Wells-next-the-Sea along the lines of the following.

“Wells has a thriving tourism industry that supports the economic vitality of the town. Due to the remote rural location and the limited public transport available many visitors arrive by car and whilst this can have adverse consequences, it is the case that Wells has prospered in a way that many other inland towns have failed to match over the last 20 years.

Car parking can be managed at Wells though close cooperation between Wells Town Council and the car-park operators. The availability of the existing car parks is absolutely essential in managing the issue including the retention of the Overflow Field west of Beach Road which is a key component of such provision and where the site is allocated for use on a seasonal basis (1st March – 31st October) Access arrangements into and out of car-parks can be fine-tuned and connectivity improved to help those arriving in cars switch to using more sustainable transport options when in Wells.”

Insert new policy XXX to read

“Land amounting to 7.3 hectares is allocated for continuing use as a seasonal public car park. The car park shall only be used on

a seasonal basis from 1st March to 31st October. Development will be subject to compliance with adopted Local Plan policies and car parking standards.

Operation of the seasonal car park will be subject to planning consent setting out details of safe vehicle access from Freeman Street car park and from Beach Road. This site is within the Norfolk Coast AONB, and operation of this car park should be informed by, and be sympathetic to, the special landscape character of this protected site.”

Modifications requested

SEE ATTACHED FILE

Policy HC7 within the Regulation 19 version of the Plan states that development proposals which would result in the loss of public car parking facilities which make an important contribution to local parking provision will not be permitted. The Estate strongly supports this policy. This issue is particularly relevant to the issue of parking within Wells where the Estate is the largest provider of car parking.

Further, the Estate requests that the Overflow Field site to the west of Beach Road currently used for seasonal car parking should be allocated in the Local Plan for this use.

The Overflow Field car park has become an indispensable part of the provision of car parking in Wells since it came into use, initially on an adjacent field in 2007 before being relocated to the current field in 2015.

It is the only feasible solution to meet the seasonal spikes in demand for car parking at Wells from visitors prompted by hot sunny weather to visit the town and beach. On the rare occasions when it has been unavailable on a peak day (e.g. due to poor ground conditions) the town has experienced unacceptable levels of inconsiderate, unlawful and/or unsafe parking in the town, in driveways and on roadside verges. Park & Ride is not a viable option in Wells.

It is entirely appropriate in such circumstances for the Local Plan to support the indefinite provision of seasonal parking on the Overflow Field since it is absolutely vital that it remains appropriate for public parking to ensure the town can function as a safe and attractive place to visit.

The Estate has worked closely and successfully with Wells Town Council to agree strategies for parking and traffic management. The Estate has invested in measures arising from these strategies to direct inbound visitor traffic, as far as possible, to avoid The Quay area having regard to its use by pedestrians and thus raising issues of public safety and pollution.

Wells Town Council supports the continuing and uninterrupted use of the Overflow Field for seasonal car parking. **(see Appendix 1)**

The importance of Wells in the context of tourism is acknowledged by the Council and paragraph 17.0.2 within the Regulation 19 Plan states that Wells has a thriving tourism industry that supports the economic vitality of the town. The Estate acknowledges the importance of tourism and will continue to review and assess the capacity and effectiveness of the connectivity between the Town and the Beach over the coming years. In this context a new “electric” shuttle bus route is a first step towards increasing the capacity and delivering passengers more effectively to the Beach arrival point.

It is the case that the Council have granted temporary planning permission for the Overflow Field as car parking during the seasonal period of the year but have more recently recommended against an application by the Estate to establish indefinite seasonal use of the Overflow Field for car-parking. This has left this matter somewhat in limbo. For reasons set out above, it is important that certainty is provided to the Estate and to Wells town as to the continuing use of the Overflow Field during the seasonal period (1st March – 31st October). It is considered that the site should be allocated for seasonal car parking use together with new text to be added in to Chapter 17 of the Local Plan at paragraph 17.0.2 as relates to Wells-next-the-Sea along the lines of the following.

“Wells has a thriving tourism industry that supports the economic vitality of the town. Due to the remote rural location and the limited public transport available many visitors arrive by car and whilst this can have adverse consequences, it is the case that Wells has prospered in a way that many other inland towns have failed to match over the last 20 years.

Car parking can be managed at Wells though close cooperation between Wells Town Council and the car-park operators. The availability of the existing car parks is absolutely essential in managing the issue including the retention of the Overflow Field west of Beach

	<p>Road which is a key component of such provision and where the site is allocated for use on a seasonal basis (1st March – 31st October) Access arrangements into and out of car-parks can be fine-tuned and connectivity improved to help those arriving in cars switch to using more sustainable transport options when in Wells.”</p> <p>Insert new policy XXX to read</p> <p>“Land amounting to 7.3 hectares is allocated for continuing use as a seasonal public car park. The car park shall only be used on a seasonal basis from 1st March to 31st October. Development will be subject to compliance with adopted Local Plan policies and car parking standards.</p> <p>Operation of the seasonal car park will be subject to planning consent setting out details of safe vehicle access from Freeman Street car park and from Beach Road. This site is within the Norfolk Coast AONB, and operation of this car park should be informed by, and be sympathetic to, the special landscape character of this protected site.”</p>
<p>Appear at examination hearing session(s)?</p> <p>* No, I do not wish to participate in examination hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To debate fully the issue of car parking with the Council and the implications for Wells next the Sea.
Attachment(s)	Appendix 1 - Overflow Field Car Park, Wells.pdf
Consultation Point Title	Wells-next-the-Sea
Consultation Point Number	17
Section of the Plan	17 Wells-next-the-Sea
ID	LPS436
Response Date	07/03/2022 14:57:31
Name	
Organisation	Holkham Estate
Agent Name	Mr Garth Hanlon
Agent Organisation	Savills (UK) Limited
<p>Do you consider the plan to be Legally Compliant?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Has the duty to cooperate been met?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Do you consider the plan to be Sound?</p> <p>* Yes</p> <p>* No</p>	No
<p>Reason(s) not Sound</p> <p>* It is not positively prepared</p> <p>* It is not effective</p> <p>* It is not justified</p> <p>* It is not consistent with national policy</p>	It is not positively prepared It is not effective; It is not justified
Explanation	<p>SEE ATTACHED FILE</p> <p><u>Land south of Warham Road, Wells-next-the-Sea – object to Wells next the Sea chapter</u></p> <p>Savills (UK) Ltd is instructed by The Holkham Estate to make the necessary and relevant representations to the Regulation 19 version of the Local Plan for North Norfolk. As a major landowner within the District, it is important to engage with the Development Plan process and as such, the representations are submitted to ensure that the Plan is positively prepared, justified, effective and consistent with National Policy within the NPPF.</p> <p>This representation constitutes an objection to the Regulation 19 version of the Local Plan given that the Wells next the Sea Chapter and Local plan Policy HOU1 “ Delivering Sufficient Homes” fails to meet the actual housing needs of the area and thus is not effective.</p> <p>In such circumstances, it is our client’s view that further land should be allocated for residential development over and above the two</p>

proposed allocations in the Plan for Wells-next-the Sea (Sites W07/1 and W01/1). Both of these proposed allocations are the subject of separate representations by the Estate .

A separate representation has been made by Savills UK Limited to the Council concerning Policy HOU1 in respect of the proposed housing requirement where the authority is advocating a departure from use of the Standard Method, as set out in national policy and guidance, arguing there are exceptional circumstances which justify an alternative approach. We do not consider there are exceptional circumstances that justify a departure from the Standard Method. The Standard Method should be used for North Norfolk, resulting in a housing requirement for the emerging Local Plan of 531dpa. The clear implications of this, in the event that the Inspector accepts this position, is the need for the Council to be including more allocations within its Plan.

It is considered that the land at Warham Road at Wells next the Sea, the subject of this representation, can contribute to such a housing requirement. The plan as it currently stands is not sound on the basis that it has not been positively prepared, is not justified and not consistent with national policy and is thus not effective.

It is requested that the Local Plan is amended (both Policy HOU1 and the Wells next the Sea Chapter) to include the allocation of a parcel of land off Warham Road in Wells-next-the-Sea for a largely residential development. The 12.4 hectare site consists of two agricultural fields surrounding New Farm on the south side of Warham Road, close to the junction with Stiffkey Road. The farm is in different ownership and does not form part of the proposed site for allocation.

An existing track runs from Warham Road down the west side of the farm, leading to two light industrial units and an existing Victorian water tower which occupies the crest of a small hill. The lane is a public right of way (PROW) and this will be maintained as a key feature of the new development. From the crest of the hill the footpath drops down the slope connecting out into a series of public paths in the landscape to the south of the site.

The east side of the site is defined by a mature field hedge. To the north, the site is bounded by dense mature planting along a disused railway cutting, around New Farm, and along the Warham Road frontage. The west side of the site is an open field which drops down the hill to meet the large playing fields behind the school on Market Lane.

A Proposed Development Strategy document is submitted in support of this representation showing the site of some 12.4 hectares proposing a two phased development comprising some 100-130 homes within the first phase and some 60-80 homes in the second phase of development together with some light industrial commercial workspace. This is enclosed at **Appendix 1**. All of the land being promoted lies within the ownership of the Holkham Estate.

The Proposed Development Strategy has been prepared by the Estate to support the case for a new allocation. The document provides a context for the document in terms of the emerging Local Plan (currently at Submission stage) and acknowledges that the proposed phased manner of the development provides the opportunity for an Inspector and the Council to consider whether one or more phases of development should come forward with the plan period up to 2036.

The document identifies the landscape and visual constraints of the site and assesses site access issues from Warham Road. It then sets out a broad development strategy by way of a general layout diagram together with a concept masterplan and then addresses the potential of a two phase development .

Site Assessment

It is acknowledged that a larger site was previously submitted for consideration as part of the Call for Sites stage of the Local Plan Review and which referred to as site W11.

The Housing and Economic Land Availability Assessment (HELAA) (June 2017) Appendix 2 assessed the site (reference H0288) - the site was larger in 2017 since it also included an area of land further to the east. Within the HELAA assessment the site scored positively (green) in respect of the following matters:

- The site is located off the Warham Road and could provide suitable access.
- The site is within 2,000m to a school and employment, and 1,200m away from a facility found in Wells-next-the-Sea.
- The site is located in Flood Zone 1, with a very small part of the site at risk of surface water flooding.

- For developments of greater than 10 properties it is assumed that some enhancement to capacity may be required.
- The site is noted to be greenfield site which consists of grassland with some boundary hedges. No known impact on designated site, protected species or ecological network.
- The site is compatible with existing neighbouring uses.
- The site is not in close proximity to any historic heritage assets or environment.
- The site is not located in the proximity of a heritage townscape.
- The site would not result in the loss of any open space.

In terms of Amber scoring, the suitability assessment noted

- The site is located within the Area of Outstanding Natural Beauty which has richly diverse and distinctive landscape. Development in this location should be sensitive to the wide skylscapes, seascapes and dark night skies and should protect the quality and character of Wells.
- In terms of landscape the site is located in an area designated as 'undeveloped coast'.
- In terms of contamination and ground stability the site is acknowledged to be mostly greenfield site but the mast to the rear of the may be contaminated and could affect development potential in terms of utilities infrastructure.

The Council scored the site negatively (red) in respect of the following criteria:

- Impact upon the local road network is considered to be unsuitable either in terms of road or junction capacity, or lack of footpath provision.
- Based on current evidence, the site is near to a settlement but the local road network is considered to be unsuitable

Both of these matters are addressed below within this representation

At that time the Council considered that the site was not suitable for development and by way of the HELAA sustainability comments stated that:

"The site is well related to Wells-Next-The-Sea, has access to facilities and utilities. The site is in FZ1. The site is in a moderate to high sensitive landscape within the ANOB, development in this location should be sensitive to the wide skylscapes, and dark night skies and any development proposals should protect the quality and character of Wells-Next-the-Sea. Undulating site rising to the south with mature trees along roadside boundary. Based on current evidence, the site is considered to be unsuitable as the local road network is considered to be unsuitable either in terms of road or junction capacity" (page 970 of HELAA Appendix 2)

The Council's assessment of the site as stated within its recently published Sustainability Appraisal (January 2022) at page 126, states:

"The site is remote and detached from the town and services. It would be a development in open countryside and could have an adverse impact on the landscape and the Area of Outstanding Natural Beauty. Highways access and the local network are considered to be unsuitable. The site is not considered to be suitable for development. Furthermore, the preferred sites can deliver sufficient housing for Wells."

This summary is difficult to reconcile with the summary of the findings of the HELAA when it comes to the assessment of the site and its relationship to Wells. The HELAA says it is well related and the Sustainability Appraisal says it is remote and detached. It is requested that the Inspector assess this matter for themselves given the competing views. The Estate considers that the site is well related having regard to its location on the edge of the settlement boundary in a location in our view which is the only suitable additional area for new development over and above the two allocations within the Plan having regard to topography, character and flood risk

In terms of the aspects which the Council raises by way of concern, we would make the following comments

Local accessibility and the road network

Warham Road is a single carriageway road with a carriageway width of approximately 6.1 metres. It is subject to a 30mph speed limit to the residential edge of the town and thereafter is subject to the national speed limit.

Approximately 150m northwest of the site boundary Warham Road connects with the A149 via a simple priority controlled junction.

The A149 is one of the two main roads for local and regional traffic in North Norfolk, the other being the A148. The A148 and the A149 link

at King's Lynn and Cromer with the A149 following the coast between these two settlements and the A148 offering a more direct, cross district route. Accordingly the A148 and the A149 are important links in terms of traffic movements at both a local and regional level, as the wider road network can be accessed beyond Kings Lynn and Cromer.

To the west of the junction between Warham Road and the A149 is a simple priority junction where the A149 meets the B1105, which provides a route south from the town to the A148.

Regarding pedestrian and cycle accessibility, the footway provision along Warham Road consists of a single footway that is approximately 2m wide along the northern side of the carriageway. Prior to the junction between the A149 and Warham Road the footway switches from the northern side of the carriageway to the southern side with a very small section of on carriageway pedestrian facility. From the junction with the A149 there is a wider pedestrian network that links the site with the facilities and services provided within the town, including a series of controlled and uncontrolled crossing points at key locations.

The nearest bus stops to the site are located on the A149 between Warham Road and Polka Road. The bus stops provide for both eastbound and westbound bus journeys and are designated by a bus stop flag.

The most local railway stations for Wells-next-the-Sea are Sheringham station (approximately 17 miles) and Kings Lynn station (approximately 28 miles). Sheringham station has a frequent train service to Norwich and Kings Lynn station offers a regular train service to Ely, Cambridge and London.

On more site specific matters, Create Highway Engineers were instructed by Holkham Estate to assess vehicular access to the site and have concluded that an appropriate junction can be designed to allow for a suitable access onto Warham Road . This is in the form of a T junction with a carriageway width of 5.5 metres and of 43m x 2.4m x 43m visibility splays. This is capable of accommodating up to 150 dwellings. This new access point is also complemented by the provision of a new emergency access point to the east where it is provided with droppable bollards or similar.

In addition to this new junction to Warham Road, the engineers have assessed the need or otherwise to make necessary highways improvements to the junction at Warham Road and the A149. The drawing contained within the enclosed Proposed Development Strategy document (see Appendix 1) at page (shows these improvements and include the reduction in road width to improve visibility and the provision of a new zebra crossing.

It is considered that these improvements address the Council's comments about the unsuitability of the road network

Landscape Impact

It is acknowledged that the site falls to be considered within the Area of Outstanding Natural Beauty and which is a designation that covers the whole of Wells Next the Sea. Consequently any development that occurs within the town or on the edge of town falls within such a designation. Given that two allocations have been identified with the AONB it is clear that there is no in built objection *per se* to development within the AONB.

Clearly in circumstances where there is a significant impact and the benefits of the development do not outweigh the harm caused, then that will be an issue to be assessed but it is our view that the scale of development proposed , the local character of the site and its context together with the need for further housing numbers in Wells , it is considered that development in the manner suggested is appropriate.

In support of the development proposal as set out with the Proposed Development Strategy document (see Appendix 1), The Landscape Partnership were instructed by the Holkham Estate to prepare a Landscape and Visual Statement to provide a high-level review of landscape (site features and landscape character) and visual receptors that might be affected by the proposed residential development at the site, and sets out ways that these effects could be negated or mitigated. (This is enclosed at **Appendix 2**)

In order to undertake the preliminary landscape and visual appraisal the following work stages were undertaken:

- Desktop study to identify an indicative zone of visual influence, any local statutory and non-statutory landscape-related designations, local public rights of way, and existing landscape character assessments covering the site and its vicinity.

- Field study to verify local landscape characteristics; provide commentary on the condition, sensitivity and capacity of the local landscape character to accommodate change of the type and scale proposed; appraise the contribution of any landscape features within the site that might be lost; identify and provide commentary on the sensitivity of key visual receptors.
- Identification of any parcels of land within the site that might have the capacity, in landscape terms, to accommodate residential development, to help inform the emerging masterplan.
- Identification of any broad mitigation measures that may be required if the proposed development is to be considered acceptable. These were summarised in a Landscape Strategy diagram which formed part of the brief to the architect for development the illustrative master plan.

The Landscape Strategy Diagram sets out mitigation measures that will operate in the near, mid-range views of the site, as follows:

- No development will take place around water-tower at the crest of the hill or on its south-facing slope. This area will be developed and retained as a public open space for the new development and wider town residents and visitors, comprising species-rich meadow planting for enhanced biodiversity value over existing use
- Development will be limited to the west side of the existing field hedge running north-south to the east of the water tower, to limit visual impact on glimpsed views from Warham Road in the approach to the town. The existing hedge is to be retained and enhanced by a 10m screen-planting zone, to mask the eastern flank of the proposed development.
- New 20m screen planting belts will be created to the west and south-west margins of site, to limit view of the proposed development from the footpaths and more distant road network to the south of the site.

It is acknowledged that the character of the site itself would inevitably change as a result of development however it is the case that the character of the site is somewhat influenced by its proximity to the existing urban edge, which reduces sensitivity compared to other parts of the character. In terms of sensitive features, there will be an impact on the existing trees which line Warham Road whilst retaining the network of hedges within the site. Whilst it is accepted that the proposed development would cause a change in character to the Open Rolling Farmland in the context of the Landscape Character Guidelines, these would be localised and contained given the new development would be associated with the existing urban edge and thus the effect on the character area would be limited. This is especially the case where mitigation planting would also help to integrate development within the landscape.

Regarding the views from the Wells/ Holkham Coastal Marshes (OCM6) as defined in the Landscape Character Guidelines for the AONB, views towards the site from this area would be limited although the new development will be visible from certain very distant points. Development on the north facing slope between Warham Road and the water tower will be just visible in these very distant views. Planting within the development will soften its profile over time, and a new block of woodland between this part of the site and the water tower will eventually provide a rear 'backdrop' screen, so that the skyline silhouette will be of tree-tops rather than roofs.

Having regard to the above, it is our view that the proposed development is capable of being accommodated within the landscape having regard to the site's relationship to the settlement and the landscape within which it sits together with the plan and form of development and the mitigating measures being put forward.

Ecological Impact

A Preliminary Ecological Appraisal (PEA) was undertaken as it relates to the site and supports this representation. The appraisal included a habitat survey, protected species scoping survey and desktop study of protected and notable sites and species in the area. A site visit was undertaken on 17 March 2021. Following this appraisal, bat activity surveys were conducted between April and October 2021. This Ecology Report is enclosed at **Appendix 3**.

The Appraisal has concluded that the site contains habitats typical of the surrounding agricultural land use with much of the area being dominated by arable fields and modified grassland which are generally considered to be of low conservation value. However, these arable and grassland fields are important for key species, such as farmland birds and bats.

The key ecological factors for consideration at the site are:

- Potential impacts on Habitat Sites (i.e., former European designated/Natura 2000 sites);
- Potential presence of ecologically valuable hedgerows;
- Potential presence of great crested newts;
- Potential presence of reptiles;
- Potential impacts on protected bird species and bird species of conservation concern;
- Potential presence of roosting bats;
- Confirmed presence of commuting and foraging bats.

Further survey effort is required for a number of species groups to establish the full extent of key protected and notable species at the Site. The one species group that may have a significant on the available development footprint are bats and as such surveys have been conducted in 2021. The surveys identify the site as having important features for this species group, including the nationally rare and Norfolk Priority Species barbastelle. As recommended in the PEA, the illustrative masterplan includes dark buffer zones along the former railway cutting on the north flank of the site, down the west side of New Farm, adjacent to the retained existing track and hedges, and along the site entrance on Warham Road.

Additional survey effort should incorporate great crested environmental DNA survey, reptile survey, breeding and wintering bird surveys and a badger survey. Many of these surveys can only be completed at specific times of year.

A key aspect of the assessment will be identifying any potential impacts on the designated sites of international importance. The assessment will need to take into account direct impacts, such as potential loss of foraging and roosting habitats for birds, but also indirect impacts, such as increased disturbance resulting from higher visitor numbers in the coastal areas.

In summary, the Site has ecological features which must be recognised in the development process. However, such features are not unusual within farmland habitats, and providing suitable mitigation strategies can be established, they should not preclude future development. We would confirm that MKA Ecology who undertook the PEA have worked closely with the project team in producing the proposed Development Strategy document.

In order to ensure that the best opportunities for ecological mitigation and enhancing are achieved at the site it is recommended that in the event of an allocation, ecological input is made available throughout the master planning stages and to apply the Biodiversity Net Gain methodology at an early stage. Opportunities are available for enhancing the conservation value of the site and to deliver overall gains in biodiversity.

Summary

This site is being promoted by the Estate as a new allocation within the plan and as such constitutes an objection to that plan. The submission of this representation is in the context of a separate representation made by Savills objecting to the assumptions made by the Council in respect of its housing needs assessment and where Savills conclude that the Standard Method should be used for North Norfolk, resulting in a housing requirement for the ELP of 531dpa.

The proposed phasing of the Warham Road site allows for the assimilation of the development on the edge of Wells whilst the accompanying documents demonstrate that whilst inevitably change will occur, the mitigation measures being put in place will reduce impact and ensure the appropriate provision for new housing, open space and employment for the town within this plan period. In the absence of this allocation it is our view that the plan is unsound because it fails to meet the area's actual assessed housing needs and thus not be effective.

As part of discussions in advance of this representation, the Estate has engaged with Homes for Wells who are a Charitable Community Benefit Society set up in 2006 to seek to address issues of housing affordability. Homes for Wells have expressed their support for the provision of intermediate rented property for local working people within the development and in circumstances where an element of new housing would be passed over to the organisation.

In the event that the Local Plan requires amendment to include the proposed allocation it is proposed that Policy HOU1 is amended to account for any proposed new allocation in the event that a new policy is inserted within Chapter 17 of the Local Plan to read as follows:

"Policy XXXX

Land south of Warham Road, Wells-next-the-Sea

Land amounting to approximately 12.4 Ha is proposed to be allocated for residential development of approximately 210 dwellings and 0.75 hectares of land for light industrial commercial workspace.

Planning permission will be granted subject to compliance with the policies of this Plan, and the following site specific requirements:

- 1 **Delivery of high quality design that pays careful attention to site layout, building heights and materials in order to minimise the visual impact of the development on the Norfolk Coast AONB and long distance wider landscape views;**
- 2 **Provision of 2.2 hectares of high quality public open space including facilities for play & informal recreation;**
- 3 **Provision of convenient and safe vehicular access to the site from Warham Road;**
- 4 **Retention and enhancement of mature hedgerows and trees around the site boundaries including provision of new landscaping along site boundaries;**
- 5 **Submission, approval and implementation of a Surface Water Management Plan ensuring that there is no adverse effects on European sites and greenfield run off rates are not increased;**
- 6 **Submission, approval and implementation of a Foul Water Drainage Strategy including details of any off-site mains water reinforcement, enhancements and setting out how additional foul flows will be accommodated within the foul sewerage network;**
- 7 **Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS)”**

In the circumstances where only a Phase 1 development was considered acceptable then the policy should be reworded accordingly to read :

“Land amounting to approximately 8.7 Ha is proposed to be allocated for residential development of approximately 100-130 dwellings and 0.75 hectares of land for light industrial commercial workspace.”

Modifications requested

SEE ATTACHED FILE

Land south of Warham Road, Wells-next-the-Sea – object to Wells next the Sea chapter

Savills (UK) Ltd is instructed by The Holkham Estate to make the necessary and relevant representations to the Regulation 19 version of the Local Plan for North Norfolk. As a major landowner within the District, it is important to engage with the Development Plan process and as such, the representations are submitted to ensure that the Plan is positively prepared, justified, effective and consistent with National Policy within the NPPF.

This representation constitutes an objection to the Regulation 19 version of the Local Plan given that the Wells next the Sea Chapter and Local plan Policy HOU1 “ Delivering Sufficient Homes” fails to meet the actual housing needs of the area and thus is not effective.

In such circumstances, it is our client’s view that further land should be allocated for residential development over and above the two proposed allocations in the Plan for Wells-next-the Sea (Sites W07/1 and W01/1). Both of these proposed allocations are the subject of separate representations by the Estate .

A separate representation has been made by Savills UK Limited to the Council concerning Policy HOU1 in respect of the proposed housing requirement where the authority is advocating a departure from use of the Standard Method, as set out in national policy and guidance, arguing there are exceptional circumstances which justify an alternative approach. We do not consider there are exceptional circumstances that justify a departure from the Standard Method. The Standard Method should be used for North Norfolk, resulting in a housing requirement for the emerging Local Plan of 531dpa. The clear implications of this, in the event that the Inspector accepts this position, is the need for the Council to be including more allocations within its Plan.

It is considered that the land at Warham Road at Wells next the Sea, the subject of this representation, can contribute to such a housing

requirement. The plan as it currently stands is not sound on the basis that it has not been positively prepared, is not justified and not consistent with national policy and is thus not effective.

It is requested that the Local Plan is amended (both Policy HOU1 and the Wells next the Sea Chapter) to include the allocation of a parcel of land off Warham Road in Wells-next-the-Sea for a largely residential development. The 12.4 hectare site consists of two agricultural fields surrounding New Farm on the south side of Warham Road, close to the junction with Stiffkey Road. The farm is in different ownership and does not form part of the proposed site for allocation.

An existing track runs from Warham Road down the west side of the farm, leading to two light industrial units and an existing Victorian water tower which occupies the crest of a small hill. The lane is a public right of way (PROW) and this will be maintained as a key feature of the new development. From the crest of the hill the footpath drops down the slope connecting out into a series of public paths in the landscape to the south of the site.

The east side of the site is defined by a mature field hedge. To the north, the site is bounded by dense mature planting along a disused railway cutting, around New Farm, and along the Warham Road frontage. The west side of the site is an open field which drops down the hill to meet the large playing fields behind the school on Market Lane.

A Proposed Development Strategy document is submitted in support of this representation showing the site of some 12.4 hectares proposing a two phased development comprising some 100-130 homes within the first phase and some 60-80 homes in the second phase of development together with some light industrial commercial workspace. This is enclosed at **Appendix 1**. All of the land being promoted lies within the ownership of the Holkham Estate.

The Proposed Development Strategy has been prepared by the Estate to support the case for a new allocation. The document provides a context for the document in terms of the emerging Local Plan (currently at Submission stage) and acknowledges that the proposed phased manner of the development provides the opportunity for an Inspector and the Council to consider whether one or more phases of development should come forward with the plan period up to 2036.

The document identifies the landscape and visual constraints of the site and assesses site access issues from Warham Road. It then sets out a broad development strategy by way of a general layout diagram together with a concept masterplan and then addresses the potential of a two phase development .

Site Assessment

It is acknowledged that a larger site was previously submitted for consideration as part of the Call for Sites stage of the Local Plan Review and which referred to as site W11.

The Housing and Economic Land Availability Assessment (HELAA) (June 2017) Appendix 2 assessed the site (reference H0288) - the site was larger in 2017 since it also included an area of land further to the east. Within the HELAA assessment the site scored positively (green) in respect of the following matters:

- The site is located off the Warham Road and could provide suitable access.
- The site is within 2,000m to a school and employment, and 1,200m away from a facility found in Wells-next-the-Sea.
- The site is located in Flood Zone 1, with a very small part of the site at risk of surface water flooding.
- For developments of greater than 10 properties it is assumed that some enhancement to capacity may be required.
- The site is noted to be greenfield site which consists of grassland with some boundary hedges. No known impact on designated site, protected species or ecological network.
- The site is compatible with existing neighbouring uses.
- The site is not in close proximity to any historic heritage assets or environment.
- The site is not located in the proximity of a heritage townscape.
- The site would not result in the loss of any open space.

In terms of Amber scoring, the suitability assessment noted

- The site is located within the Area of Outstanding Natural Beauty which has richly diverse and distinctive landscape. Development in this location should be sensitive to the wide skylscapes, seascaapes and dark night skies and should protect the quality and character of Wells.

- In terms of landscape the site is located in an area designated as 'undeveloped coast'.
- In terms of contamination and ground stability the site is acknowledged to be mostly greenfield site but the mast to the rear of the may be contaminated and could affect development potential in terms of utilities infrastructure.

The Council scored the site negatively (red) in respect of the following criteria:

- Impact upon the local road network is considered to be unsuitable either in terms of road or junction capacity, or lack of footpath provision.
- Based on current evidence, the site is near to a settlement but the local road network is considered to be unsuitable

Both of these matters are addressed below within this representation

At that time the Council considered that the site was not suitable for development and by way of the HELAA sustainability comments stated that:

"The site is well related to Wells-Next-The-Sea, has access to facilities and utilities. The site is in FZ1. The site is in a moderate to high sensitive landscape within the ANOB, development in this location should be sensitive to the wide skyscapes, and dark night skies and any development proposals should protect the quality and character of Wells-Next-the-Sea. Undulating site rising to the south with mature trees along roadside boundary. Based on current evidence, the site is considered to be unsuitable as the local road network is considered to be unsuitable either in terms of road or junction capacity" (page 970 of HELAA Appendix 2)

The Council's assessment of the site as stated within its recently published Sustainability Appraisal (January 2022) at page 126, states:

"The site is remote and detached from the town and services. It would be a development in open countryside and could have an adverse impact on the landscape and the Area of Outstanding Natural Beauty. Highways access and the local network are considered to be unsuitable. The site is not considered to be suitable for development. Furthermore, the preferred sites can deliver sufficient housing for Wells."

This summary is difficult to reconcile with the summary of the findings of the HELAA when it comes to the assessment of the site and its relationship to Wells. The HELAA says it is well related and the Sustainability Appraisal says it is remote and detached. It is requested that the Inspector assess this matter for themselves given the competing views. The Estate considers that the site is well related having regard to its location on the edge of the settlement boundary in a location in our view which is the only suitable additional area for new development over and above the two allocations within the Plan having regard to topography, character and flood risk

In terms of the aspects which the Council raises by way of concern, we would make the following comments

Local accessibility and the road network

Warham Road is a single carriageway road with a carriageway width of approximately 6.1 metres. It is subject to a 30mph speed limit to the residential edge of the town and thereafter is subject to the national speed limit.

Approximately 150m northwest of the site boundary Warham Road connects with the A149 via a simple priority controlled junction.

The A149 is one of the two main roads for local and regional traffic in North Norfolk, the other being the A148. The A148 and the A149 link at King's Lynn and Cromer with the A149 following the coast between these two settlements and the A148 offering a more direct, cross district route. Accordingly the A148 and the A149 are important links in terms of traffic movements at both a local and regional level, as the wider road network can be accessed beyond Kings Lynn and Cromer.

To the west of the junction between Warham Road and the A149 is a simple priority junction where the A149 meets the B1105, which provides a route south from the town to the A148.

Regarding pedestrian and cycle accessibility, the footway provision along Warham Road consists of a single footway that is approximately 2m wide along the northern side of the carriageway. Prior to the junction between the A149 and Warham Road the footway switches from the northern side of the carriageway to the southern side with a very small section of on carriageway pedestrian facility. From the junction with the A149 there is a wider pedestrian network that links the site with the facilities and services provided within the town,

including a series of controlled and uncontrolled crossing points at key locations.

The nearest bus stops to the site are located on the A149 between Warham Road and Polka Road. The bus stops provide for both eastbound and westbound bus journeys and are designated by a bus stop flag.

The most local railway stations for Wells-next-the-Sea are Sheringham station (approximately 17 miles) and Kings Lynn station (approximately 28 miles). Sheringham station has a frequent train service to Norwich and Kings Lynn station offers a regular train service to Ely, Cambridge and London.

On more site specific matters, Create Highway Engineers were instructed by Holkham Estate to assess vehicular access to the site and have concluded that an appropriate junction can be designed to allow for a suitable access onto Warham Road. This is in the form of a T junction with a carriageway width of 5.5 metres and of 43m x 2.4m x 43m visibility splays. This is capable of accommodating up to 150 dwellings. This new access point is also complemented by the provision of a new emergency access point to the east where it is provided with droppable bollards or similar.

In addition to this new junction to Warham Road, the engineers have assessed the need or otherwise to make necessary highways improvements to the junction at Warham Road and the A149. The drawing contained within the enclosed Proposed Development Strategy document (see Appendix 1) at page (shows these improvements and include the reduction in road width to improve visibility and the provision of a new zebra crossing.

It is considered that these improvements address the Council's comments about the unsuitability of the road network

Landscape Impact

It is acknowledged that the site falls to be considered within the Area of Outstanding Natural Beauty and which is a designation that covers the whole of Wells Next the Sea. Consequently any development that occurs within the town or on the edge of town falls within such a designation. Given that two allocations have been identified with the AONB it is clear that there is no in built objection *per se* to development within the AONB.

Clearly in circumstances where there is a significant impact and the benefits of the development do not outweigh the harm caused, then that will be an issue to be assessed but it is our view that the scale of development proposed, the local character of the site and its context together with the need for further housing numbers in Wells, it is considered that development in the manner suggested is appropriate.

In support of the development proposal as set out with the Proposed Development Strategy document (see Appendix 1), The Landscape Partnership were instructed by the Holkham Estate to prepare a Landscape and Visual Statement to provide a high-level review of landscape (site features and landscape character) and visual receptors that might be affected by the proposed residential development at the site, and sets out ways that these effects could be negated or mitigated. (This is enclosed at **Appendix 2**)

In order to undertake the preliminary landscape and visual appraisal the following work stages were undertaken:

- Desktop study to identify an indicative zone of visual influence, any local statutory and non-statutory landscape-related designations, local public rights of way, and existing landscape character assessments covering the site and its vicinity.
- Field study to verify local landscape characteristics; provide commentary on the condition, sensitivity and capacity of the local landscape character to accommodate change of the type and scale proposed; appraise the contribution of any landscape features within the site that might be lost; identify and provide commentary on the sensitivity of key visual receptors.
- Identification of any parcels of land within the site that might have the capacity, in landscape terms, to accommodate residential development, to help inform the emerging masterplan.
- Identification of any broad mitigation measures that may be required if the proposed development is to be considered acceptable. These were summarised in a Landscape Strategy diagram which formed part of the brief to the architect for development the illustrative master plan.

The Landscape Strategy Diagram sets out mitigation measures that will operate in the near, mid-range views of the site, as follows:

- No development will take place around water-tower at the crest of the hill or on its south-facing slope. This area will be developed and retained as a public open space for the new development and wider town residents and visitors, comprising species-rich meadow planting for enhanced biodiversity value over existing use
- Development will be limited to the west side of the existing field hedge running north-south to the east of the water tower, to limit visual impact on glimpsed views from Warham Road in the approach to the town. The existing hedge is to be retained and enhanced by a 10m screen-planting zone, to mask the eastern flank of the proposed development.
- New 20m screen planting belts will be created to the west and south-west margins of site, to limit view of the proposed development from the footpaths and more distant road network to the south of the site.

It is acknowledged that the character of the site itself would inevitably change as a result of development however it is the case that the character of the site is somewhat influenced by its proximity to the existing urban edge, which reduces sensitivity compared to other parts of the character. In terms of sensitive features, there will be an impact on the existing trees which line Warham Road whilst retaining the network of hedges within the site. Whilst it is accepted that the proposed development would cause a change in character to the Open Rolling Farmland in the context of the Landscape Character Guidelines, these would be localised and contained given the new development would be associated with the existing urban edge and thus the effect on the character area would be limited. This is especially the case where mitigation planting would also help to integrate development within the landscape.

Regarding the views from the Wells/ Holkham Coastal Marshes (OCM6) as defined in the Landscape Character Guidelines for the AONB, views towards the site from this area would be limited although the new development will be visible from certain very distant points. Development on the north facing slope between Warham Road and the water tower will be just visible in these very distant views. Planting within the development will soften its profile over time, and a new block of woodland between this part of the site and the water tower will eventually provide a rear 'backdrop' screen, so that the skyline silhouette will be of tree-tops rather than roofs.

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and Norfolk Priority Species barbastelle. As recommended in the PEA, the illustrative masterplan includes dark buffer zones along the former railway cutting on the north flank of the site, down the west side of New Farm, adjacent to the retained existing track and hedges, and along the site entrance on Warham Road.

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In summary, the Site has ecological features which must be recognised in the development process. However, such features are not unusual within farmland habitats, and providing suitable mitigation strategies can be established, they should not preclude future development. We would confirm that MKA Ecology who undertook the PEA have worked closely with the project team in producing the proposed Development Strategy document.

In order to ensure that the best opportunities for ecological mitigation and enhancing are achieved at the site it is recommended that in the event of an allocation, ecological input is made available throughout the master planning stages and to apply the Biodiversity Net Gain methodology at an early stage. Opportunities are available for enhancing the conservation value of the site and to deliver overall gains in biodiversity.

Summary

This site is being promoted by the Estate as a new allocation within the plan and as such constitutes an objection to that plan. The submission of this representation is in the context of a separate representation made by Savills objecting to the assumptions made by the Council in respect of its housing needs assessment and where Savills conclude that the Standard Method should be used for North Norfolk, resulting in a housing requirement for the ELP of 531dpa.

The proposed phasing of the Warham Road site allows for the assimilation of the development on the edge of Wells whilst the accompanying documents demonstrate that whilst inevitably change will occur, the mitigation measures being put in place will reduce impact and ensure the appropriate provision for new housing, open space and employment for the town within this plan period. In the absence of this allocation it is our view that the plan is unsound because it fails to meet the area's actual assessed housing needs and thus not be effective.

As part of discussions in advance of this representation, the Estate has engaged with Homes for Wells who are a Charitable Community Benefit Society set up in 2006 to seek to address issues of housing affordability. Homes for Wells have expressed their support for the provision of intermediate rented property for local working people within the development and in circumstances where an element of new housing would be passed over to the organisation.

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- 2 Provision of 2.2 hectares of high quality public open space including facilities for play & informal recreation;***

	<p>3 Provision of convenient and safe vehicular access to the site from Warham Road;</p> <p>4 Retention and enhancement of mature hedgerows and trees around the site boundaries including provision of new landscaping along site boundaries;</p> <p>5 Submission, approval and implementation of a Surface Water Management Plan ensuring that there is no adverse effects on European sites and greenfield run off rates are not increased;</p> <p>6 Submission, approval and implementation of a Foul Water Drainage Strategy including details of any off-site mains water reinforcement, enhancements and setting out how additional foul flows will be accommodated within the foul sewerage network;</p> <p>7 Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS)”</p> <p>In the circumstances where only a Phase 1 development was considered acceptable then the policy should be reworded accordingly to read :</p> <p>“Land amounting to approximately 8.7 Ha is proposed to be allocated for residential development of approximately 100-130 dwellings and 0.75 hectares of land for light industrial commercial workspace.”</p>
<p>Appear at examination hearing session(s)?</p> <p>* No, I do not wish to participate in examination hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>Justification for appearing at hearing</p>	<p>To enabel a detailed dicsssuion about housing numbers and the appropriateness of land at Warham Road , Wells next the Sea to contribute to housing numbers with the the Plan period</p>
<p>Attachment(s)</p>	<p>Appendix 1 - Proposed Dev Strategy.pdf (4) Appendix 2 - Landscape Report_compiled.pdf (3) Appendix 3 - Ecology Report.pdf (2)</p>

17.1 Residential: Land South of Ashburton Close (W01/1)

Consultation Point Title	Residential: Land South of Ashburton Close (W01/1)
Consultation Point Number	17.1
Section of the Plan	17.1 Residential: Land South of Ashburton Close (W01/1)
ID	LPS186
Response Date	23/02/2022 15:24:00
Name	Greg Hewitt
Organisation	Wells Town Council
Agent Name	Andrea Long
Agent Organisation	Compasspoint Planning and Rural Consultants
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	SEE ATTACHED FILE This site should be de-allocated for open market housing and identified for affordable housing as shown in the adopted SADPD. This would be a more preferable option for addressing the identified housing need in the town. Identifying this site for open market housing to meet general housing need does not take on board fully the specific housing need issues of the town as evidenced by the Housing Needs Assessment: Wells, Holkham, Walsingham, Warham and Wighton (attached).
Modifications requested	SEE ATTACHED FILE This site should be removed.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	Wells Town Council would like the opportunity to make its comments and or amplify them in person
Attachment(s)	2020 03 08 Holkham HNA Final Report.pdf

Consultation Point Title	Land South of Ashburton Close
Consultation Point Number	Policy W01/1
Section of the Plan	Policy W01/1 Land South of Ashburton Close
ID	LPS382
Response Date	07/03/2022 11:28:00
Name	
Organisation	Holkham Estate
Agent Name	Mr Garth Hanlon
Agent Organisation	Savills (UK) Limited
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>Policy W01/1 – Land south of Ashburton Close</p> <p>Savills (UK) Limited is instructed by the Holkham Estate to make the necessary and relevant representations to the Regulation 19 Local Plan document currently out for consultation. As a major landowner within the District, it is important to engage with the Development Plan process and as such, the representations are submitted to ensure that the Plan is positively prepared, justified, effective and consistent with National Policy within the NPPF.</p> <p>The Holkham Estate fully supports the identification of Land south of Ashburton Close , Wells next the Sea for residential development. Policy W01/1 allocates some 0.7 hectares of land for approximately 20 dwellings. This allocated land is well related to recent housing development immediately to the north of the site which was the subject of an allocation in the current adopted development plan document (known as the Market Lane site).</p> <p>Consequently the site allocated under policy W01/1 should be seen as the residue of that housing site and it is entirely appropriate that it comes forward for new development as set out in the Local Plan having regard to its location within the settlement and the surrounding character and context. The site is considered to be suitable, available, and achievable.</p> <p>The District Council's 'Background Paper 6 Development Site Selection Methodology' in 2019 at page 122 states that the land rear of Market Lane (as it was then known) is a Preferred Site. The commentary states it is "...<i>Considered suitable to be allocated for residential development for up to 20 dwellings. The site is well positioned for access to the town centre, school and services. The site has acceptable highway access off the development to the north. Although the site is within the Area of Outstanding Natural Beauty, it is well contained in the landscape. The site scores positively in the Sustainability Appraisal. The site is considered to be one of the most sustainable and suitable of the Wells alternatives</i>"</p> <p>More recently the Council's Sustainability Appraisal document (January 2022) confirmed on page 125 that "<i>The site is well positioned for access to the town centre, school and services. The site has acceptable highway access off the development to the north. Although the site is within the Area of Outstanding Natural Beauty, it is well-contained in the landscape. The site scores positively in the Sustainability Appraisal. The site is considered to be one of the most sustainable and suitable of the Wells alternatives.</i>"</p>

	<p>Whilst the allocated area remains the same in the Regulation 19 stage of the Plan, it is noted that further site specific requirements have been referred to in the policy. The Estate is supportive of such requirements which will assist in delivering a high quality development on this site</p> <p>The Holkham Estate fully supports the identification of Land at Ashburton Close, Wells for proposed allocation of approximately 20 dwellings as set out in Policy W01/1.</p>
Modifications requested	Holkham Estate supports Policy W01/1
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land South of Ashburton Close
Consultation Point Number	Policy W01/1
Section of the Plan	Policy W01/1 Land South of Ashburton Close
ID	LPS434
Response Date	07/03/2022 17:58:00
Name	Mr Peter Terrington
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<p>SEE ATTACHED FILE</p> <p>It is my belief that the proposal to include this site, in the development boundary of Wells, for the purpose of building open market housing is unsound; instead the site should remain as "Countryside" and should be brought forward as a rural exceptions site.</p> <p>Evidence: 17.0.1 "The attractiveness of the town (Wells) has led to high demand for second homes which has contributed to increased house prices, leading to a 'shortage of affordable housing for local people'."</p> <p>I do appreciate all the hard work that went into producing the final version of the Local Plan (LP). Allocating sites for housing in Wells must have been challenging, given the special circumstances facing the community:</p> <p>1. High demand for second homes, retirement homes and properties for holiday letting.</p> <p>The risk is that most new development homes will be acquired as non permanent residences as the property prices are likely to be beyond the means of the local working population. I am very pleased that this risk has been recognised in the LP and an attempt has been made to keep the new build allocation, for Wells, to a sustainable level, particularly if the affordable homes target of 35% can be achieved! The viability of the 35% target of course will depend on the purchase price of the land and sale price of the properties. Under the previous LP the developer, of the adjoining Market Lane site, subsequently,</p>

	<p>successfully obtained a relaxation of planning conditions on viability grounds. There is no guarantee the 35% affordable quota will be delivered. Furthermore there is no guarantee that the affordable quota will be used to address the chronic shortage of affordable homes for local people.</p> <p>2. All green field development sites, around Wells, are in single ownership</p> <p>This monopoly situation tends to inflate the price of development land and therefore places viability pressures on potential developers. Hence the need for the developer of the Market Lane site, Hopkins Homes, under the previous LP, having to go back to the Council for a relaxation of planning conditions.</p> <p>Lack of affordable housing for local people and the highly inflated price of property in Wells</p> <p>It has to be recognised that in allocating housing development sites the Council has to work within the constraints of the NPPF and other legislation. However, I feel that greater weight should be placed upon the deplorable lack of affordable housing for local people and the highly inflated price of property in Wells when allocating development sites. The chronic shortage of affordable housing, in Wells, for local people, was highlighted in recent "Homes for Wells" Housing Needs surveys and it is essential to specifically include a Rural Exception Site development on the edge of the Wells development boundary; In my opinion, the best location for this is the strip of land, south of the Hopkins Homes development (Currently listed as W01/1). The local Plan proposes to bring this strip of land within the development boundary of Wells, and develop the site for open market housing, in contradiction to the recommendations of the previous LDF. (Site Allocations, Development Plan Document, page 110, 11.1.8, it is stated "Adjacent land could come forward as an affordable housing "exceptions" site and the site layout should be carefully considered to integrate with this). A counter-proposal, was lodged by the landowner, to develop the site for open market housing, but the inspector rejected this proposal and upheld the recommendation of the Council for an exception site.</p>
Modifications requested	<p>SEE ATTACHED FILE</p> <p>I would urge that the strip of land W01/1 should remain outside the development boundary of Wells, and that the site is developed as an exception site. I feel sure Homes for Wells, or another affordable housing provider, would be pleased to acquire the site and develop it, for the benefit of local people. The Council's recommendation, upheld by the Inspector, at the hearing for the previous LP, to bring W01/1 forward as an exception site must be upheld. Clearly there is a paramount need for affordable housing, for local people, in Wells, and this can be achieved through the development of a rural exceptions site on W01/1.</p>
<p>Appear at examination hearing session(s)?</p> <p>* No, I do not wish to participate in examination hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
Justification for appearing at hearing	<p>I feel it is essential that the members of the local community have the opportunity to put forward their views on this incredibly important issue which is having such a devastating impact on the opportunity for local people, particularly young working people, to live in Wells.</p>
Attachment(s)	<p>PT Submission to Final Version of Local Plan.docx Proposed Modifications to Local Plan.docx</p>
Consultation Point Title	Land South of Ashburton Close
Consultation Point Number	Policy W01/1
Section of the Plan	Policy W01/1 Land South of Ashburton Close
ID	LPS740
Response Date	28/02/2022 08:14:00
Name	Mrs Debbie Mack
Organisation	Historic England
Agent Name	

Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	There are no designated heritage assets on the site. Holkham Hall Registered Park and Garden (grade I) lies to the south and west of the site. Careful landscaping should ensure that the site is well screened from the registered park and garden. To that end we welcome bullet point 8.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

17.2 Residential: Land Adjacent Holkham Road (W07/1)

Consultation Point Title	Residential: Land Adjacent Holkham Road (W07/1)
Consultation Point Number	17.2
Section of the Plan	17.2.4
ID	LPS149
Response Date	23/02/2022 16:28:59
Name	Miss Naomi Chamberlain
Organisation	Norfolk County Council - Highway Authority (Major & Estate Development)
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Paragraph 17.2.4 states access should be provided via Mill Lane; this should refer to Mill Road.
Modifications requested	Paragraph 17.2.4 needs to be amended to reference Mill Road.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Residential: Land Adjacent Holkham Road (W07/1)
Consultation Point Number	17.2
Section of the Plan	17.2.5
ID	LPS212
Response Date	24/02/2022 10:02:52
Name	Miss Naomi Chamberlain
Organisation	Norfolk County Council - Highway Authority (Major & Estate Development)
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No

Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Paragraph 17.2.5 refers to vehicle access off Mill Lane, or Holkham Road. The Highway Authority does not support vehicular access to Holkham Road.
Modifications requested	Paragraph 17.2.5 should be amended to state "Provision of suitable vehicle access off Mill Road only,"
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Residential: Land Adjacent Holkham Road (W07/1)
Consultation Point Number	17.2
Section of the Plan	17.2 Residential: Land Adjacent Holkham Road (W07/1)
ID	LPS187
Response Date	23/02/2022 15:27:00
Name	Greg Hewitt
Organisation	Wells Town Council
Agent Name	Andrea Long
Agent Organisation	Compasspoint Planning and Rural Consultants
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	<p>The Town Council objects to the allocation of this site for residential development on the grounds of unacceptable intrusion into the landscape and detrimental impact upon the AONB. The allocation of this site has not given enough weight to the impact of this development on the AONB. In addition, there are potential tenancy issues relating to Mill Farm, which would constrain the delivery of the site and the chances of it coming forward for development. This would affect the housing trajectory for the Local Plan as a whole and therefore makes the planned housing trajectory uncertain.</p> <p>This site should be de-allocated as the consideration of the site against the assessment criteria is flawed as insufficient weight has been given to the landscape and visual impact of the development of the site on the adjacent AONB. In addition the deliverability of the site within the projected timescale is questioned given issues relating to existing tenancy rights.</p>
Modifications requested	This site should be de-allocated as the consideration of the site against the assessment criteria is flawed as insufficient weight has been given to the landscape and visual impact of the development of the site on the adjacent AONB. In addition the deliverability of the site within the projected timescale is questioned given issues relating to existing tenancy rights.
Appear at examination hearing session(s)?	Yes, I wish to participate in hearing session(s)

* * No, I do not wish to participate in examination hearing session(s) Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	Wells Town Council would appreciate the opportunity to make and amplify its points in person.
Attachment(s)	
Consultation Point Title	Residential: Land Adjacent Holkham Road (W07/1)
Consultation Point Number	17.2
Section of the Plan	17.2 Residential: Land Adjacent Holkham Road (W07/1)
ID	LPS213
Response Date	24/02/2022 10:07:26
Name	Miss Naomi Chamberlain
Organisation	Norfolk County Council - Highway Authority (Major & Estate Development)
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Map reference W07/1 does not include any connection with public highway, it is not clear how satisfactory access might be provided.
Modifications requested	Map reference W07/1 should be amended to display an access route to Mill Road.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

Consultation Point Title	Land Adjacent Holkham Road
Consultation Point Number	Policy W07/1
Section of the Plan	Policy W07/1 Land Adjacent Holkham Road
ID	LPS153
Response Date	23/02/2022 16:30:30
Name	Miss Naomi Chamberlain
Organisation	Norfolk County Council - Highway Authority (Major & Estate Development)
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Policy W07/1 point 3 – Due to the characteristics of Mill Road, access visibility splays will be required in accordance with the Design Manual for Roads and Bridges.
Modifications requested	Policy W07/1, point 3 must be amended to "Provision of convenient and safe vehicular access to site from Mill Road, in accordance with the requirements of the Design Manual for Roads and Bridges (DMRB) and to the satisfaction of the Highway Authority."
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land Adjacent Holkham Road
Consultation Point Number	Policy W07/1
Section of the Plan	Policy W07/1 Land Adjacent Holkham Road
ID	LPS262
Response Date	01/03/2022 09:37:00
Name	Mr Tony Fullwood
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes	

* No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified; It is not consistent with national policy
Explanation	<p>I object to Policy W07/1 which allocates the site for 50 dwellings as it is not effective (deliverable over the plan period), consistent with national policy (NPPF Para. 176 and National Model Design Code) or justified (an appropriate strategy). As currently proposed, the site allocation Land Adjacent Holkham Road is not suitable or achievable for 50 dwellings on the grounds of landscape impact and vehicular access.</p> <p>Landscape Impact</p> <p>The site is located within the Norfolk Coast Area of Outstanding Natural Beauty. The North Norfolk Landscape Character Assessment, 2021 identifies this site as being located within the Rolling Open Farmland Character Area. One of the key characteristics of this Character Area is its open, homogeneous character with expansive views.</p> <p>The Housing and Economic Land Availability Assessment (HELAA) June 2017 identifies this site as having a moderate to high landscape sensitivity within the ANOB.</p> <p>The Sustainability Appraisal evaluates this site as having a negative impact on the landscape objective SA8 (To protect, manage and where possible enhance the special qualities of the areas' landscapes, townscapes and seascapes (designated and non-designated) and their settings, maintaining and strengthening local distinctiveness and sense of place).</p> <p>The Submission Local Plan accepts that <i>'the site is reasonably prominent in the local landscape, particularly when viewed from the lower ground to the south. The site can also be seen from the Beach Road causeway'</i> (Para. 17.2.1).</p> <p>The policy criteria as currently worded are not consistent with national policy and would not achieve appropriate landscape mitigation in this sensitive location.</p> <p>First, criterion 1 seeks to <i>'minimise the visual impact of the development on the Norfolk Coast AONB and long distance wider landscape views'</i>. This appears to diminish and undermine Policy ENV1 which states that proposals should contribute positively and conserve and enhance the Norfolk Coast Area of Outstanding Natural Beauty, consistent with the NPPF.</p> <p>Second, text supporting Policy W/07/1 states: <i>'The site is bounded by some mature trees and hedgerows and these should be retained and extended with a strategic landscape buffer to the north of the housing site.'</i> (Para.17.2.2). Nevertheless, this is not explicitly carried forward with sufficient precision into the Policy which excludes reference to the necessary strategic landscape buffers to the north and east of the site.</p> <p>Third, the landscape strategy appears to be to surround the development with a landscape screen. However, this fails to acknowledge one of the key landscape characteristics of Wells, noted in the Landscape Character Area Assessment which states: <i>'Mature tree cover within the urban area is also an important component in settlement character.'</i> The National Model Design Code Biodiversity Design Principles states the benefits of street trees and other landscape features in providing habitat, shading, cooling, air quality improvements and carbon sequestration, as well as being a vital component of attractive places. It is the government's intention that all new streets include sufficient space for mature native trees, (National Model Design Code Para. 89). The current policy wording includes an inappropriate and insufficient response to the sensitive and prominent site within the Norfolk Coast AONB which is located on higher ground and is visible in the wide landscapes of this area, including from the Beach Road causeway.</p> <p>A consequence of the above factors is that the currently proposed suburban net density of 25dph is inappropriate. It is simply not appropriate to tack on a further suburban estate to Wells in this sensitive location. A strategic landscape buffer to the north and east as proposed in the reasoned justification and the need to enable</p>

mature native planting within the site (street trees and elsewhere through the site) would have the impact of reducing the capacity of the site in this sensitive location.

Vehicular Access

The site allocated on the Policies map is not connected to an adopted highway and is not therefore suitable or achievable. Policy W07/1 Land Adjacent Holkham Road requires '*provision of convenient and safe vehicular access to the site from Mill Road*', though no land is allocated to allow this to be achieved. However, this is contradicted by Para. 17.2.5 which states that development proposals will have to take into account: '*provision of suitable vehicle access off Mill Lane or Holkham Road*'. Finally, land is not allocated for the provision of cycle and step free pedestrian access from to Bases Lane and Holkham Road, including footway improvements to a minimum width of 2.0m between the Holkham Road pedestrian and cycle access and the boundary of the property known as 4 Laylands Yard (as required by Policy W/07/1.

Vehicular access from Holkham Road to the site would result in a wide bell mouth entrance and visibility splays to Holkham Road together with engineering works necessary to overcome the height difference between the road and the site and the removal of a length of hedge which lines this approach to Wells from Holkham. The new access road and footpaths with the inevitable signage, lighting and parked cars would urbanise the rural character of this approach to the town and have a significant adverse effect on the AONB.

The reference to vehicular access to Holkham Road may represent residual text from the HELAA, 2017 which reviewed a larger site which extended to Holkham Road. The HELAA states '*The site has direct access available from Holkham Road (C Road), which is considered could provide suitable access.*' This historic reference and ambiguous text perpetuates itself in the site name 'Land Adjacent Holkham Road' which is now misleading and inaccurate.

The nearest adopted highway to the site is Bases Lane but this is narrow in places and without a continuous footpath.

Modifications requested

Amend the wording of W07/1 Land Adjacent Holkham Road as follows:

Policy W07/1 Land north of Mill Lane

Land amounting to 2.6 hectares (*increase site area to include land necessary to achieve vehicular access from Mill Road and other pedestrian cycle links specifies in the policy*), as defined on the Policies Map (*amend Policies Map to include land necessary to achieve access from Mill Road and other pedestrian cycle links specifies in the policy*), is allocated for residential development of approximately 40 dwellings, 0.6 hectares public open space, and associated on and off-site infrastructure.

Planning permission will be granted subject to compliance with the policies of this Plan, and the following site specific requirements:

- 1 Delivery of high quality landscape led design that pays careful attention to site layout, building heights and materials in order to conserve and enhance the Norfolk Coast AONB and long distance wider landscape views;
- 2 Retention and enhancement of mature hedgerows and trees around the site boundaries including provision of strategic landscape buffers along the northern and eastern boundaries;
- 3 Provision of a substantial cover of additional mature native trees within the site to form the backdrop and setting for development and a landscaped skyline whilst enhancing biodiversity and biosecurity resilience;
- 4 Provision of 0.6 ha of high quality public open space including facilities for play & informal recreation;
- 5 Provision of a convenient, safe and tree-lined avenue to provide vehicular and pedestrian access to the site from Mill Road;
- 6 Provision of cycle and step free pedestrian access from Mill Road through the site and public open space to both Bases Lane and Holkham Road, including footway improvements to a minimum width of 2.0m between the Holkham Road pedestrian and cycle access and the boundary of the property known as 4 Laylands Yard;
- 7 Submission, approval and implementation of a Surface Water Management Plan ensuring that there is no adverse effects on European sites and greenfield run off rates are not increased;
- 8 Submission, approval and implementation of a Foul Water Drainage Strategy including details of any off-site mains water reinforcement, enhancements and setting out how additional

	<p>foul flows will be accommodated within the foul sewerage network;</p> <p>9 Delivery of a scheme that pays careful attention to design and landscaping to minimise any potential impacts on Holkham Hall Registered Park and Garden (Grade I) to the south and west of the site, and to the Wells Conservation Area directly adjacent to the north east and east of the site; and,</p> <p>10 Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS).</p> <p>The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.</p> <p>If the Policy is not reworded to incorporate the above amendments it should be deleted as not effective, in accordance with national policy or justified.</p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land Adjacent Holkham Road
Consultation Point Number	Policy W07/1
Section of the Plan	Policy W07/1 Land Adjacent Holkham Road
ID	LPS368
Response Date	06/03/2022 20:26:00
Name	Mr Christopher Yardley
Organisation	
Agent Name	
Agent Organisation	
<p>Do you consider the plan to be Legally Compliant? * Yes * No</p>	
<p>Has the duty to cooperate been met? * Yes * No</p>	
<p>Do you consider the plan to be Sound? * Yes * No</p>	No
<p>Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy</p>	It is not consistent with national policy
Explanation	<p>I wish to make a representation to object to the proposed inclusion of land for housing and new area of public open space for the above development on the following grounds.</p> <p>The development will extend the built environment of Wells in a direction and on a topographical feature (hilltop) which will substantially negatively impact on the special landscape quality of the North Norfolk AONB. The site is extremely prominent due to the landform and will mean that the new development will be seen from a large swathe of the AONB coastal area – substantially altering and urbanising the views from these locations. The current development dating from the 1930s on Mill Road is effectively screened from views from the coast by their long gardens which contain mature trees hedging and shrubs, together with the topography of the hill to the north of them. The new proposed development has no existing landscape features which will soften, integrate or screen this development and it will present a</p>

	<p>damaging scar of built development on a hilltop overlooking the AONB. Clearly the intention of the developers, and expectation of the purchasers of such properties will be to maximise this 'view' of the AONB, and development screening is likely to be insubstantial and resisted / eroded by both these agents. It would also take many years (2+ decades) to be even marginally effective in this hillside location which is exposed to substantial coastal winds and forces</p> <p>Similarly nocturnal views of the town and area of countryside to the west of it will be substantially impacted by the presence of new housing, street lighting, lit windows and outside lights on buildings.</p> <p>The requirement for this number of new houses is unfounded in this location. Similar development to the south of the Town (Ashburton Close) has a second home occupancy of around 80% and this new development may be expected to be similarly occupied. As such it has no meaningful relationship to any notion of 'sustainability' and is providing for a recreational demand from persons travelling to the County from other parts of the country rather than homes for an indigenous population.</p> <p>The cumulative impact of this development will be substantial and will result in significant harm to the special qualities of the AONB contrary to the policy requirements of the NPPF (2018) which seek to provide AONBs with the 'highest protection'. It also fails the NPPF test of sustainability. It will also be contrary to the provisions in the new NNDC Local Plan in relation to the protection of the AONB, dark skies landscapes and the provisions and recommendations in the NNDC Landscape Character Assessment (SPD) 2018.</p>
Modifications requested	Remove this site from those sites included in the local plan
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land Adjacent Holkham Road
Consultation Point Number	Policy W07/1
Section of the Plan	Policy W07/1 Land Adjacent Holkham Road
ID	LPS415
Response Date	07/03/2022 13:25:00
Name	
Organisation	Holkham Estate
Agent Name	Mr Garth Hanlon
Agent Organisation	Savills (UK) Limited
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified
Explanation	SEE ATTACHED FILE Objection to policy W07/1 Savills (UK) Ltd is instructed by the Holkham Estate to make the necessary and relevant representations to the Regulation 19 version of the Local Plan for North Norfolk. As a major landowner within the District, it is important to engage with the Development Plan process

and as such, the representations are submitted to ensure that the Plan is positively prepared, justified, effective and consistent with National Policy within the NPPF.

This representation constitutes an objection to the Regulation 19 version of the Local Plan given that Policy HOU1 "Delivering Sufficient Homes" fails to meet the actual housing needs of the area and this is not effective. As such, it is our view that the plan is not positively prepared and is thus not effective.

In such circumstances, it is our client's view that further land should be allocated for residential development over and above the two proposed allocations in the Plan for Wells-next-the-Sea (Sites W07/1 and W01/1). Both of these proposed allocations are the subject of separate representations by the Estate.

A separate representation has been made by Savills on behalf of the Estate to the Council concerning Policy HOU1 in respect of the proposed housing requirement where the authority is advocating a departure from use of the Standard Method, as set out in national policy and guidance, arguing there are exceptional circumstances which justify an alternative approach. We do not consider there are exceptional circumstances that justify a departure from the Standard Method. The Standard Method should be used for North Norfolk, resulting in a housing requirement for the emerging Local Plan of 531dpa. The clear implications of this, in the event that the Inspector accepts this position, is the need for the Council to be including more allocations within its Plan.

In a separate representation the Holkham Estate has expressed its support for the identification of Land adjacent to Holkham Road, Wells for a proposed allocation of 50 dwellings together with open space as set out in Policy W07/1 of the Local Plan. This site is considered to be suitable, available, and achievable and is in the single ownership of the Holkham Estate and who are able to bring forward the site within the plan period.

Notwithstanding that representation of support for the allocation, the Estate is also submitting this representation to seek the identification of further land for residential development adjacent to this allocation under Policy W07/1. On the basis that this representation seeks a change to the Local Plan by allocating additional land for development, then this representation constitutes an objection to the Plan.

Policy W07/1 within the Proposed Submission Version (Regulation 19 Publication) Local Plan has been altered from the earlier Regulation 18 version so that the envisaged capacity is now "approximately 50 dwellings" and the site area now measured to be 2.6 hectares, following the removal of the narrow strip of land connecting to Mill Road. It is assumed that such changes in terms of the site area and the change to 50 dwellings is a result of administrative checks. The retention of the word "approximately" reflects the recognition that there must be an inbuilt flexibility within the policy to allow for a detailed layout to be prepared following detailed technical analysis and which could generate a higher or lower number than 50 dwellings.

Regarding the vehicular access to the site, the policy now makes it clear within site specific requirement number 3 that there should be "*.....provision of convenient and safe vehicular access to the site from Mill Road.*"(note – references are made in paragraphs 17.2.4 and in 17.2.5 to Mill Lane. This should be corrected to read "Mill Road")

It is confirmed that such vehicular access can be secured onto Mill Road (A149). Such a new access point could mean that the existing access to Mill Farm Holidays and the associated stables would be served by a new access point with the existing access being stopped up and changed to a footway. This falls within the 30 mph speed limit.

This would create a new T-junction access point onto the A149 approximately mid-way along the southern frontage of the Site, at a point where visibility would be maximised in the horizontal of the plane and also at the top of the crest in the road where visibility would also be maximised in the vertical plane.

In respect of pedestrian and cycle access, site requirement 5 of the Policy requires the appropriate connections to Holkham Road, Mill Road and Bases Lane. These are shown on the accompanying plan. (**Appendix 1** to this representation)

The District Council's 'Background Paper 6 - Development Site Selection Methodology' to the May 2019 version of the Local Plan (page 122) identified the site to be a "Preferred Site" and stated "*Considered suitable to be allocated for up to 50 dwellings and delivery of public open space.*"

The Council has continued to support the allocation in the Regulation 19 version of the Plan and in the Sustainability Appraisal published in January 2022 (page 125) concluded “*The site is well positioned for access to the town centre, school and services. Highway access can be achieved off Mill Road. Although the site is within the Area of Outstanding Natural Beauty, considerate design and layout, together with the on-site open space, will mitigate the impact on the landscape. The site scores positively in the Sustainability Appraisal. The site is considered to be one of the more sustainable and suitable of the Wells alternatives.*”.

In the circumstances where the creation of a new road link onto Mill Road is a critical part of the policy, the Estate considers that the opportunity to allocate further land close to this access point to create further land for new housing is appropriate. This is on the basis that a new road access and associated traffic movements linked to a new housing site will to an extent change the character of the land and that the provision of further land for new development will address our view that the plan needs to accommodate greater housing numbers than set out within the plan and that the settlement of Wells and this site in particular has the ability to accommodate such development.

It is our view that extending the proposed allocation in the manner proposed as set out in **Appendix 2** (see enclosed) allows for the development of some 3.6 hectares of development including 0.63 hectares of open space. The result of such an extension of the allocation in the manner shown is to allow for the potential for a further 20 dwellings to come forward over and above the 50 or so dwellings identified within the proposed allocation with the Plan. The identification of this contiguous parcel to the existing allocation within the plan at Policy W07/1 is considered to be a logical extension where the form of development would sit alongside the existing development along Mill Road at this edge of the settlement

In the event where the Council or the Inspectors would support the extension of the existing allocation to include more land to provide more housing, then this would mean the necessarily amendment to Policy HOU1 of the plan to account for the proposed extra number of dwellings on this site as well as changes to Policy W07/1 to read as follows:

“Policy W07/1

Land Adjacent Holkham Road

Land amounting to 3.6 hectares, as defined on the Policies Map, is allocated for residential development of approximately 70 dwellings, 0.6 hectares public open space, and associated on and off-site infrastructure.

Planning permission will be granted subject to compliance with the policies of this Plan, and the following site specific requirements:.....”

Modifications requested

SEE ATTACHED FILE

Objection to policy W07/1

Savills (UK) Ltd is instructed by the Holkham Estate to make the necessary and relevant representations to the Regulation 19 version of the Local Plan for North Norfolk. As a major landowner within the District, it is important to engage with the Development Plan process and as such, the representations are submitted to ensure that the Plan is positively prepared, justified, effective and consistent with National Policy within the NPPF.

This representation constitutes an objection to the Regulation 19 version of the Local Plan given that Policy HOU1 “Delivering Sufficient Homes” fails to meet the actual housing needs of the area and this is not effective. As such, it is our view that the plan is not positively prepared and is thus not effective.

In such circumstances, it is our client’s view that further land should be allocated for residential development over and above the two proposed allocations in the Plan for Wells-next-the Sea (Sites W07/1 and W01/1). Both of these proposed allocations are the subject of separate representations by the Estate.

A separate representation has been made by Savills on behalf of the Estate to the Council concerning Policy HOU1 in respect of the proposed housing requirement where the authority is advocating a departure from use of the Standard Method, as set out in national policy and guidance, arguing there are exceptional circumstances which justify an alternative approach. We do not consider there are exceptional circumstances that justify a departure from the Standard Method. The Standard Method should be used for North Norfolk,

resulting in a housing requirement for the emerging Local Plan of 531dpa. The clear implications of this, in the event that the Inspector accepts this position, is the need for the Council to be including more allocations within its Plan

In a separate representation the Holkham Estate has expressed its support for the identification of Land adjacent to Holkham Road, Wells for a proposed allocation of 50 dwellings together with open space as set out in Policy W07/1 of the Local Plan. This site is considered to be suitable, available, and achievable and is in the single ownership of the Holkham Estate and who are able to bring forward the site within the plan period.

Notwithstanding that representation of support for the allocation, the Estate is also submitting this representation to seek the identification of further land for residential development adjacent to this allocation under Policy W07/1. On the basis that this representation seeks a change to the Local Plan by allocating additional land for development, then this representation constitutes an objection to the Plan.

Policy W07/1 within the Proposed Submission Version (Regulation 19 Publication) Local Plan has been altered from the earlier Regulation 18 version so that the envisaged capacity is now "approximately 50 dwellings" and the site area now measured to be 2.6 hectares, following the removal of the narrow strip of land connecting to Mill Road. It is assumed that such changes in terms of the site area and the change to 50 dwellings is a result of administrative checks. The retention of the word "approximately" reflects the recognition that there must be an inbuilt flexibility within the policy to allow for a detailed layout to be prepared following detailed technical analysis and which could generate a higher or lower number than 50 dwellings.

Regarding the vehicular access to the site, the policy now makes it clear within site specific requirement number 3 that there should be ".....*provision of convenient and safe vehicular access to the site from Mill Road.*"(note – references are made in paragraphs 17.2.4 and in 17.2.5 to Mill Lane . This should be corrected to read "Mill Road")

It is confirmed that such vehicular access can be secured onto Mill Road (A149). Such a new access point could mean that the existing access to Mill Farm Holidays and the associated stables would be served by a new access point with the existing access being stopped up and changed to a footway. This falls within the 30 mph speed limit.

This would create a new T-junction access point onto the A149 approximately mid-way along the southern frontage of the Site, at a point where visibility would be maximised in the horizontal of the plane and also at the top of the crest in the road where visibility would also be maximised in the vertical plane.

In respect of pedestrian and cycle access , site requirement 5 of the Policy requires the appropriate connections to Holkham Road, Mill Road and Bases Lane . These are shown on the accompanying plan. (**Appendix 1** to this representation)

The District Council's 'Background Paper 6 - Development Site Selection Methodology' to the May 2019 version of the Local Plan (page 122) identified the site to be a "Preferred Site" and stated "*Considered suitable to be allocated for up to 50 dwellings and delivery of public open space.*"

The Council has continued to support the allocation in the Regulation 19 version of the Plan and in the Sustainability Appraisal published in January 2022 (page 125) concluded "*The site is well positioned for access to the town centre, school and services. Highway access can be achieved off Mill Road. Although the site is within the Area of Outstanding Natural Beauty, considerate design and layout, together with the on-site open space, will mitigate the impact on the landscape. The site scores positively in the Sustainability Appraisal. The site is considered to be one of the more sustainable and suitable of the Wells alternatives.*"

In the circumstances where the creation of a new road link onto Mill Road is a critical part of the policy, the Estate considers that the opportunity to allocate further land close to this access point to create further land for new housing is appropriate . This is on the basis that a new road access and associated traffic movements linked to a new housing site will to an extent change the character of the land and that the provision of further land for new development will address our view that the plan needs to accommodate greater housing numbers than set out within the plan and that the settlement of Wells and this site in particular has the ability to accommodate such development.

It is our view that extending the proposed allocation in the manner proposed as set out in **Appendix 2** (see enclosed) allows for the

	<p>development of some 3.6 hectares of development including 0.63 hectares of open space. The result of such an extension of the allocation in the manner shown is to allow for the potential for a further 20 dwellings to come forward over and above the 50 or so dwellings identified within the proposed allocation with the Plan. The identification of this contiguous parcel to the existing allocation within the plan at Policy W07/1 is considered to be a logical extension where the form of development would sit alongside the existing development along Mill Road at this edge of the settlement</p> <p>In the event where the Council or the Inspectors would support the extension of the existing allocation to include more land to provide more housing, then this would mean the necessarily amendment to Policy HOU1 of the plan to account for the proposed extra number of dwellings on this site as well as changes to Policy W07/1 to read as follows:</p> <p>“Policy W07/1 Land Adjacent Holkham Road Land amounting to 3.6 hectares, as defined on the Policies Map, is allocated for residential development of approximately 70 dwellings, 0.6 hectares public open space, and associated on and off-site infrastructure. Planning permission will be granted subject to compliance with the policies of this Plan, and the following site specific requirements:.....”</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To provide the opportunity for our client to fully consider the Council's case for Policy W07/1 having regard to the separate representations submitted to Policy HOU 1 concerning housing figures.
Attachment(s)	Appendix 1 - proposed access on Mill Road.pdf (1) Appendix 2 - Land at Mill Road.pdf
Consultation Point Title	Land Adjacent Holkham Road
Consultation Point Number	Policy W07/1
Section of the Plan	Policy W07/1 Land Adjacent Holkham Road
ID	LPS407
Response Date	07/03/2022 12:36:00
Name	
Organisation	Holkham Estate
Agent Name	Mr Garth Hanlon
Agent Organisation	Savills (UK) Limited
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	SEE ATTACHED FILE Savills (UK) Ltd is instructed by the Holkham Estate to make the necessary and relevant representations to the Regulation 19 version of the Local Plan for North Norfolk. As a major landowner within the District, it is important to engage with the Development Plan process and as such, the representations are submitted to ensure that the Plan

is positively prepared, justified, effective and consistent with National Policy within the NPPF.

The Holkham Estate fully supports the identification of Land adjacent to Holkham Road, Wells for proposed allocation of 50 dwellings together with open space as set out in Policy W07/1 of the Local Plan. This site is considered to be suitable, available, and achievable and is in the single ownership of the Holkham Estate and who are able to bring forward the site within the plan period.

It is noted that the site was also allocated in the First Draft Local Plan (Part 1) stage in 2019 when it was envisaged to have capacity for “approximately 60 dwellings” at that stage. In addition, the area of the allocation was measured to be “approximately 2 hectares” and which also included a narrow strip of land connecting the proposed new housing area running southwards to connect to Mill Road. The supporting text to the Policy at that time (paragraph 19.25) stated that “...further evidence will be required to ascertain the suitability of vehicular access from either Mill Road, Holkham Road or Bases Lane”.

The policy that is now included within the Proposed Submission Version (Regulation 19 Publication) Local Plan has been altered so that the envisaged capacity is now “approximately 50 dwellings” and the site area now measured to be 2.6 hectares, following the removal of the narrow strip of land connecting to Mill Road. It is assumed that such changes in terms of the site area and the change to 50 dwellings is a result of administrative checks. The retention of the word “*approximately*” reflects the recognition that there must be an inbuilt flexibility within the policy to allow for a detailed layout to be prepared following detailed technical analysis and which could generate a higher or lower number than 50 dwellings.

Regarding the vehicular access to the site, the policy now makes it clear within site specific requirement number 3 that there should be “...provision of convenient and safe vehicular access to the site from Mill Road.”(note – references are made in paragraphs 17.2.4 and in 17.2.5 to Mill Lane. This should be corrected to read “Mill Road”)

It is confirmed that such vehicular access can be secured onto Mill Road (A149). Such a new access point could mean that the existing access to Mill Farm Holidays and the associated stables would be served by a new access point with the existing access being stopped up and changed to a footway. This falls within the 30 mph speed limit. The new access road would be subject to landscaping measures along its length including the new access arrangement associated with Mill Farm including the junction onto Mill Road.

This would create a new T-junction access point onto the A149 approximately mid-way along the southern frontage of the Site, at a point where visibility would be maximised in the horizontal of the plane and also at the top of the crest in the road where visibility would also be maximised in the vertical plane.

In respect of pedestrian and cycle access, site requirement 5 of the Policy requires the appropriate connections to Holkham Road, Mill Road and Bases Lane . These are shown on the accompanying plan. (**Appendix 1** to this representation)

The District Council’s ‘Background Paper 6 - Development Site Selection Methodology’ to the May 2019 version of the Local Plan (page 122) identified the site to be a “Preferred Site” and stated “*Considered suitable to be allocated for up to 50 dwellings and delivery of public open space.*”

The Council has continued to support the allocation in the Regulation 19 version of the Plan and in the Sustainability Appraisal published in January 2022 (page 125) concluded “*The site is well positioned for access to the town centre, school and services. Highway access can be achieved off Mill Road. Although the site is within the Area of Outstanding Natural Beauty, considerate design and layout, together with the on-site open space, will mitigate the impact on the landscape. The site scores positively in the Sustainability Appraisal. The site is considered to be one of the more sustainable and suitable of the Wells alternatives.*”.

The Estate concurs with this assessment.

The Holkham Estate fully supports the identification of Land adjacent to Holkham Road, Wells as set out in Policy W07/1 of the Local Plan.

NB. A separate representation is made to the Plan by the Estate seeking an extension to this allocation on its western side and which by definition should be considered as an objection to the Plan.

Modifications requested

SEE ATTACHED FILE

	Holkham estate supports Policy W07/1 of the plan . (note that a separate representation is submitted by way of an objection to seek an extension of this allocation on its western side.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	Appendix 1 - proposed access on Mill Road.pdf
Consultation Point Title	Land Adjacent Holkham Road
Consultation Point Number	Policy W07/1
Section of the Plan	Policy W07/1 Land Adjacent Holkham Road
ID	LPS741
Response Date	28/02/2022 08:14:00
Name	Mrs Debbie Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	There are no designated heritage assets within this site. However the Wells Conservation Area lies to the north east of the site and Holkham Hall grade I registered park and garden lies to the south west of the site. We welcome the reference to Holkham Hall Registered Park and Garden and Wells Conservation Area in the policy.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land Adjacent Holkham Road
Consultation Point Number	Policy W07/1
Section of the Plan	Policy W07/1 Land Adjacent Holkham Road
ID	LPS710
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	

Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Sound - Subject to project level HRA. The policy supports residential developments which may result in an increase in recreational use of designated sites. In line with the plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, environmental net gain and provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal. This policy is also located within or in close proximity to the Norfolk Coast AONB. Due consideration should be taken to determine any adverse effects on the special qualities of the protected landscape.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Consultation Point Title	Blakeney
Consultation Point Number	18
Section of the Plan	18.0.6
ID	LPS294
Response Date	02/03/2022 15:26:21
Name	Mr Clive Albany
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared It is not effective; It is not justified
Explanation	<p>Section 18.0.4 rightly recognises that there is little underdeveloped space within Blakeney and much of the village is in a Conservation Area and within the Area of Outstanding Natural Beauty. Furthermore 18.0.5 suggests that any new housing development will be in open countryside and probably impact on the sensitive landscape.</p> <p>However in 18.0.6, NNDC have chosen a site which will be very prominent in the landscape as it lies on one of the main routes into the village (B1156) and is outside of the existing village's southern boundary. It has also chosen a site which has been twice rejected in previous Local Plans due to its obvious prominence in the landscape.</p>
Modifications requested	<p>The principal need for housing in the village is social housing not open market housing. NNDC have chosen not to promote an obvious site (designated as BLA07 in the Draft Local Plan) which lies within the existing village boundary. This is well connected to the village and all services and could provide 8 social housing units. BLA04/A was chosen instead and may provide 11 social housing units (35% allocation) if all of the projected 30 houses are actually built.</p> <p>BLA07 has a very similar Sustainability score to BLA04/A. The Local Plan claims that BLA07 "is an important designated open space". In fact, it is rarely used, and when used is it as a overspill public car park. The site does back onto the very large village playing field and the village hall and its large carpark which is regularly used for sport, recreation and village events.</p> <p>The land of BLA07 is owned by the county council (NCC). NNDC should have approached NCC to acquire outright or at least agree a very long term lease for a portion of this land.</p> <p>However, Broadland Housing Trust approached Blakeney Parish Council and the Blakeney Neighbourhood Housing Association suggesting to work together to provide social housing on part of BLA07. The Parish Council supported this initiative. The plan was to build 8 social housing properties on a small strip of this land running alongside the Langham Road (B1156)</p> <p>NNDC should revisit this as a now viable option as it has obvious environmental and social benefits for the village.</p> <p>I attach a site schematic which shows the 8 houses sited just off the Langham Road well within the existing village southern boundary</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s)	No, I do not wish to participate in examination hearing session(s)

* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	Broadland Housing layout for BLA07.pdf

18.1 Residential: Land East of Langham Road (BLA04/A)

Consultation Point Title	Residential: Land East of Langham Road (BLA04/A)
Consultation Point Number	18.1
Section of the Plan	18.1
ID	LPS116
Response Date	19/02/2022 17:51:38
Name	Dr Victoria Holliday
Organisation	NNDC
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Whilst affordable housing is welcomed, there is concern that these market dwellings in this popular tourist destination will become second or holiday homes, already running at 40%.
Modifications requested	Market homes should have principal residency restrictions or similar applied. add to policy Provision of high quality landscaping....to protect the residential amenities of neighbouring properties'
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Residential: Land East of Langham Road (BLA04/A)
Consultation Point Number	18.1
Section of the Plan	18.1.3
ID	LPS659
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No

Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<p><i>18.1.3 The site is located approximately 150 metres to the north east of the Wiveton Downs Site of Special Scientific Interest...</i></p> <p>This clause does not meet the “Justified” or “Effective” test of soundness.</p> <p>According to 6.6.8 Wiveton Downs and Kelling Heath Holiday Park “have been awarded Dark Sky Discovery Site status and special attention should be given to these areas and the wider AONB”. The BLA04/A development thus flies in the face of the Plan itself.</p>
Modifications requested	This development site should be removed from the Plan.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

Consultation Point Title	Land East of Langham Road
Consultation Point Number	Policy BLA04/A
Section of the Plan	Policy BLA04/A Land East of Langham Road
ID	LPS101
Response Date	11/02/2022 17:49:00
Name	Mr Anthony Faulkner
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	Site Policy BLA04/A of the Plan is not sound in its proposal to provide 30 new homes as any of these houses that are market houses will not contribute either to the population growth in North Norfolk or to the national need for housing, as they will almost all end up in use as weekend or holiday homes. The evidence for this is in recent experience of housing built in the village. In Harbour Way, the most recent estate built in Blakeney, only one of twelve market houses is fully occupied, all the others being holiday homes. In an earlier group of houses in Samphire Close, only one of eight houses is occupied permanently, the others again being used as holiday homes. This evidence can easily be confirmed by North Norfolk District Council. It is therefore unrealistic to expect that the houses built on BLA04/A will contribute to the need for permanent housing either locally or nationally.
Modifications requested	The Plan should be modified by excluding the housing proposed for site BLA04/A and, instead, a site should be found for a much smaller group of affordable houses only. Possible sites would be as an extension to Oddfellows Field off Queens Close, or as part of the Playing Field on Langham Road. A scheme has been put forward for six affordable homes on the latter site as a combined exercise by Blakeney Neighbourhood Housing Society and the Broadland Housing Group, for which funding is available. The land is owned by Norfolk County Council and is, therefore, immediately available, and both sites could be treated as exceptions policy sites ensuring they remain affordable for all time.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land East of Langham Road
Consultation Point Number	Policy BLA04/A
Section of the Plan	Policy BLA04/A Land East of Langham Road
ID	LPS295
Response Date	02/03/2022 15:58:00

Name	Mr Clive Albany
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<p>The selection of BLA04/A is economically flawed. This large site of 1.5ha is solely needed to permit the building and subsequent sale of 19 open market properties (with probable average selling prices of £750,000 each and up to £1 million for the largest 4 bedroom properties abutting open land) so that a developer can build 11 social housing units offered at attractive prices.</p> <p>The selection of BLA04/A is also flawed environmentally. It requires at least 1.5ha of prime agricultural land. Spatial Strategy Policy SS1 states that it is "to promote the efficient use of land, to minimise loss of undeveloped land, and to protect the most valuable agricultural land". Building 30 houses on open and productive agricultural land contravenes all these policy points.</p> <p>The 4 hectare field, of which BLA04/A is part, has for the last 50 years and more, produced annually a wide range of cereals and sugar beet crops. It is currently fully planted out. It is an essential natural environment for the local wild life which are regularly evident in this ancient field.</p> <p>Furthermore, BLA04/A is highly visible in the environment being at the very edge of the existing village's southern boundary adjacent to the Langham Road (B1156). It will also be very prominent in the landscape when approaching Blakeney from the south east along the Saxlingham Road. It will also partially blocks a view to Blakeney Church which is a Grade 1 listed building.</p> <p>The chosen site also contravenes the "Blakeney : Conservation Area Appraisal and Management Plan" adopted by NNDC in 2019. The Recommendations on P96 state as follows:-</p> <ul style="list-style-type: none"> - Key views within and into the Conservation Area will be preserved. - Views of landmark buildings, particularly the church and Blakeney Hotel, will be preserved. - Views of Blakeney from Wiveton and Cley, and from the surrounding landscape to the south and south- west will be preserved.
Modifications requested	<p>BLA04/A should be abandoned and BLA07 designated as the preferred allocation. It will mitigate all of the above concerns that make BLA04/A inappropriate in a village set in an AONB.</p> <p>The land of BLA07 is owned by the county council (NCC). NNDC should have approached NCC to acquire outright or at least agree a very long term lease for a portion of this land.</p> <p>Broadland Housing Trust approached Blakeney Parish Council and the Blakeney Neighbourhood Housing Association suggesting to work together to provide social housing on part of BLA07. The Parish Council supported this initiative. The plan was to build 8 social housing properties on a small strip of this land running alongside to Langham Road.</p> <p>NNDC should review this now as a viable option as it has obvious environmental and social benefits for the village.</p> <p>The use of a small part (probably only 0.25ha) of an unused playing field is more beneficial to Blakeney and its environment than BLA04/A in that it achieves broadly the same key housing objective of delivering</p>

	8 social housing units without the need to use up valuable agricultural land and spoil the setting of Blakeney village when entering via the B1156.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	Broadland Housing layout for BLA07.pdf (1)
Consultation Point Title	Land East of Langham Road
Consultation Point Number	Policy BLA04/A
Section of the Plan	Policy BLA04/A Land East of Langham Road
ID	LPS310
Response Date	03/03/2022 14:44:42
Name	Mr Clive Albany
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective
Explanation	<p>Overall the Policy details are appropriate but not sufficiently detailed in landscaping aspects of Footpath 6.</p> <p>At the end of Paragraph 1, the policy states that the purpose of Paragraph 1 is " to protect the residential amenities of adjacent occupiers."</p> <p>However, at the end of Para 6, which deals generally with the south, east and west boundary of the proposed development then specifically with the northern FP6 boundary, the protective statement is watered down as " to facilitate access and protect amenity"</p> <p>Whose access and whose amenity?</p> <p>On Dec 1st 2021 in email to me from NNDC Planning in response to my earlier email of the same date, the officer agreed in writing to amend the end of Para 6 to read "to facilitate access and protect the residential amenities of adjacent occupiers".</p> <p>The amendment was not carried out despite several follow-up emails.</p> <p>The Planning Policy group have therefore gone back on a written agreement designed to strengthen this aspect of the Policy.</p> <p>These comments are made in the hope that NNDC will not renege on a direct agreement to amend Para 6 of the Policy document.</p> <p>They have no reason not to given that the amendment is to strengthen the landscaping for all users and those houses adjacent to this footpath. It is not merely tautology.</p>
Modifications requested	<p>The Para 6 of the Policy document should be amended to the wording in the paragraph below that was agreed to on Dec 21st. (see attached file)</p> <p>The NNDC Planning officer agreed in writing to amend the end of Para 6 to read "to facilitate access and protect the residential amenities of adjacent occupiers".</p>

	<p>Paragraph 1 is an over-arching and general attempt to outline the design of any new housing development particularly in Blakeney.</p> <p>Footpath FP6 runs along the rear curtilage of properties on the southern side of Kingsway and into "The Butts". It will be therefore be on the northern edge of any new development. It has been a natural and wide boundary for the existing properties between their rear gardens and the large open arable field for more than 60 years. Kingsway was developed approximately between 1968-1972.</p> <p>The reason for asking for this amendment to Para 6 is to ensure that any planning application for BLA04/A recognises that FP6 is a major and well-used footpath in Blakeney. The principal users are visitors, locals, walking clubs, fitness groups and importantly, by Langham Road children and their parents to get to the junior school. Any such children living in the new development will also use this route.</p> <p>This amendment is designed to highlight the critical nature of this footpath by ensuring that the developer's site does not encroach on the landscaping and necessary improvement of FP6 by "design creep" i.e sacrificing the overall width of this footpath and omitting any newly required tree and bush planting and landscaping, due the need to build housing closer to the northern site boundary to perhaps accommodate the estate access road and the new green space highlighted in Para 10.</p> <p>NB : The attached file has been redacted to omit my email address and phone number , some supporting attachments and to remove NNDC logo boxes</p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	I am unsure that NNDC will actually make this necessary policy amendment despite written agreement to do so and despite recently appealing to senior planning management to make good on a written agreement.
Attachment(s)	Email exchange Ashwell and Albany 21 Dec 2021.pdf
Consultation Point Title	Land East of Langham Road
Consultation Point Number	Policy BLA04/A
Section of the Plan	Policy BLA04/A Land East of Langham Road
ID	LPS366
Response Date	05/03/2022 21:25:00
Name	Mrs Yvonne Tyndall
Organisation	
Agent Name	
Agent Organisation	
<p>Do you consider the plan to be Legally Compliant? * Yes * No</p>	
<p>Has the duty to cooperate been met? * Yes * No</p>	
<p>Do you consider the plan to be Sound? * Yes * No</p>	No
<p>Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy</p>	It is not effective; It is not justified
Explanation	The allocation of BLA04/A as residential development land is ill-thought out and mistakenly placed. To build dwellings on this area would completely ruin the approach to Blakeney from the south and create an eyesore on an otherwise almost rural village view. In addition, to extend the roof line across from Harbour Way on the west side of Langham Road would be erroneous as it is far too high. And to

	enhance FP6 would be at a cost to local wildlife. If these proposed properties were to be sold on the open market, the majority of them would almost definitely be sold as second homes. Blakeney needs no more of these. What it does need desperately are homes for local people.
Modifications requested	A smaller development site needs to be sought for useful housing to benefit the local population.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land East of Langham Road
Consultation Point Number	Policy BLA04/A
Section of the Plan	Policy BLA04/A Land East of Langham Road
ID	LPS611
Response Date	02/03/2022 19:38:00
Name	Mr David Foreman
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	I fully endorse the comments, already made by Mr Faulkner, which stated any new housing will almost certainly be sold for second houses and do nothing to lesson any housing shortage. I would further add that in the current circumstances regarding Climate Change, we should not be sacrificing agricultural land for unnecessary Housing Developments, which will also despoil Areas of Outstanding Natural Beauty. The Public Footpath FP6 at the rear of the present village boundary, enjoys views over open fields, which are much appreciated by visitors and residents alike, but will be reduced to a narrow viewless, uninviting corridor.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land East of Langham Road
Consultation Point Number	Policy BLA04/A
Section of the Plan	Policy BLA04/A Land East of Langham Road
ID	LPS742

Response Date	28/02/2022 08:14:00
Name	Mrs Debbie Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	There are no designated heritage assets on this site. The Glaven Valley Conservation Area lies to the east of the site but is a considerable distance away from the site and so development in this location should have limited impact upon the Conservation Area and its setting. We welcome the reference to views of Blakeney Church.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land East of Langham Road
Consultation Point Number	Policy BLA04/A
Section of the Plan	Policy BLA04/A Land East of Langham Road
ID	LPS698
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Sound- Subject to project level HRA

	<p>This policy supports residential developments which may result in an increase in recreational use of designated sites. In line with the plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and provide an appropriate Surface Water and/or Foul Sewage Drainage Strategy as part of the development proposal.</p> <p>This allocation is also located within or in close proximity to the Norfolk Coast AONB. In support of Policy ENV1, due consideration should be taken to determine any adverse effects on the special qualities of the protected landscape. Priority habitats and species should also be considered to assess the impact of the development proposals on local wildlife, in line with paragraphs 175 and 176 of the NPPF.</p>
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Consultation Point Title	Land East of Astley Primary School
Consultation Point Number	Policy BRI01
Section of the Plan	Policy BRI01 Land East of Astley Primary School
ID	LPS28
Response Date	26/01/2022 10:48:00
Name	Mrs Maggie Deeley
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared It is not justified
Explanation	<p>Whilst I support the need for housing and also affordable housing in Briston for local people, after visiting the roadshow on the Local plan at the Briston Pavilion Thursday 9th May 2019, and now reading the proposed plan, I have to say I am most concerned at the level of development planned for the village.</p> <p>65 houses either side of Astley School – that is going to mean 50+ cars exiting onto the Fakenham road, either via The Lane or associated roads which already struggle at peak school time. How this can be seen to follow Green policies I don't know, the pollution will increase.</p> <p>It should be also noted that there have been numerous accidents on Fakenham Road, the most recent last Friday, 21st January 2021, involving a motorbike, lorry and a car.</p> <p>Unfortunately, big lorries thunder through our village on their way to the farms and associated services. I know I was told that parking will be addressed but people will want to park outside their homes. At peak times, it is difficult to negotiate past Astley school – I agree that the pull in bays help, but it is still an issue. There is also the issue of only having a footpath on one side of the Fakenham road.</p> <p>NNDC has recently approved planning permission for 9 houses off the The Lane in Briston behind Holly House, their access, looking at the plans, will be onto The Lane as well (PF/19/1648) this is then upping the amount planning to be built to in the time period to 74 houses.</p> <p>I appreciate the issues need to be addressed, but can Briston really support 74 houses without destroying the character of our village? I think not.</p>
Modifications requested	<p>The volume of building should be revised by at least two thirds, the volume of traffic through the village currently is too high, the access routes woefully inadequate, visibility splays very bad.</p> <p>A full traffic survey should be conducted to assess the current issues on Fakenham Road and the results published.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	

Consultation Point Title	Land East of Astley Primary School
Consultation Point Number	Policy BRI01
Section of the Plan	Policy BRI01 Land East of Astley Primary School
ID	LPS519
Response Date	08/02/2022 14:22:00
Name	Mrs Karen Kinsley
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	As a resident of woodfield, briston i am emailing with concerns of new houses hoping to be built either side of school. I am concerned that there will be even more cars parking outside the school and if the school is big enough for more students and also more people adding to the doctors list as its hard enough to get an appointment at my local doctors and not being sent to holt or further away.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land East of Astley Primary School
Consultation Point Number	Policy BRI01
Section of the Plan	Policy BRI01 Land East of Astley Primary School
ID	LPS429
Response Date	07/03/2022 16:51:39
Name	Mr Richard Waddingham
Organisation	
Agent Name	Mrs Phoebe Heath
Agent Organisation	Bidwells LLP
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes	No

* No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<p>SEE ATTACHED FILE</p> <p>Number of Dwellings</p> <p>Paragraph 9.2.4 of the Regulation 19 Draft Local Plan notes that in establishing the capacity for homes on each site, a density of approximately 30 (villages) or 40 (towns) dwellings per hectare has been used as a starting point.</p> <p>As Briston is allocated as a Large Growth Village, under paragraph 9.2.4, a density of approximately 30 dwellings per hectare would be an appropriate starting point. This would reflect the previously proposed Policy DS 25 as per the North Norfolk District Council Emerging Local Plan (Part 1) Consultation, which allocated land for 40 dwellings, which equated to 29 dwellings per hectare based on a site area of 1.4 hectares. Nonetheless, the wording of the proposed Policy BRI01 has allocated residential development of approximately 25 dwellings, which would equate to the density of 18 dwellings per ha.</p> <p>It is also noted under paragraph 9.2.4 that an allowance has been made to ensure each site can deliver the range of uses required, and where it is considered that sites may not be suitable for this density of development, perhaps because of local character considerations, an adjustment has been made. However, we argue that there is no justification within the proposed Policy BRI01 relating to local character considerations or other potential constraints that has resulted in the reduction of these units. Therefore, the approximate number of dwellings should be increased to the number proposed within the previous Policy DS 25.</p> <p>Accordingly, the proposed Policy should be amended to state that: 'Land amounting to 1.4 hectares, as defined on the Policies Map, is allocated for residential development of approximately 40 dwellings, public open space, school parking and associated supporting on and off-site infrastructure'. This change will ensure that the policy is both justified and effective.</p> <p>Point 1 of the proposed wording seeks the retention of existing roadside hedges and setting back of development on both road frontages. The wording of Point 1 is, in principle, supported. However, the policy should make it clear that removal of certain hedges is likely to be required to facilitate access to the site and ensure adequate visibility splays can be provided.</p> <p>Therefore, Point 1 should be amended to state: '1. Retention of existing roadside hedges, except where removal is required to facilitate access, and setting back of development on both road frontages'. This change will ensure that the policy is both justified and effective.</p> <p>Point 2 of the proposed wording of Policy BRI01 requires the provision of a car parking area for the school (pick up and drop off). However, given that both Policy BRI01 and BRI02 have the requirement for a car parking area for the adjacent Astley School, we feel parking provision is not required across both of the sites. Therefore, point 2 should be amended to require the provision of a car park, unless already provided on an alternative site.</p> <p>Accordingly, Point 2 should be amended to state: '2. Provision of a car parking area for the school (pick up and drop off), unless already provided on an alternative site'. This change will ensure that the policy is both justified and effective.</p> <p>Policy 4 of the proposed wording of Policy BRI01 notes the location of a water main across the site. However, subsequent investigations by developers has identified that a water main is not located within the site. Therefore, the wording should be amended to only require the provision of a layout which protects, or relocates the existing water main, if it is located on the site.</p> <p>Accordingly, Point 4 should be amended to state: '4. Provision of a layout of development which would protect, or relocate the existing water main, if located on the site'.</p>
Modifications requested	<p>SEE ATTACHED FILE</p> <p>Accordingly, the below amendments are required to ensure the policy wording is both justified and effective. The proposed amendments to the policy are in bold, while the proposed text for removal is in Strikethrough.</p>

	<p>Land amounting to 1.4 hectares, as defined on the Policies Map, is allocated for residential development of approximately 2540 dwellings, public open space, school parking and associated supporting on and off-site infrastructure.</p> <p>1. Retention of existing roadside hedges, except where removal is required to facilitate access, and setting back of development on both road frontages;</p> <p>2. Provision of a car parking area for the school (pick up and drop off), unless already provided on an alternative site;</p> <p>4. Provision of a layout of development which would protect, or relocates, the existing water main that crosses the site if located on the site;</p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	I reserve the right to appear prior to publication of the draft agendas that will set out the Inspector's matters and questions to form the basis of the discussions at the Hearings. The intention to appear is to seek to ensure that the Policy can be made sound, if required.
Attachment(s)	Briston - Land to the East of Astley Primary School.pdf
Consultation Point Title	Land East of Astley Primary School
Consultation Point Number	Policy BRI01
Section of the Plan	Policy BRI01 Land East of Astley Primary School
ID	LPS515
Response Date	20/01/2022 22:25:00
Name	Grenville Whaling & Christine Allison
Organisation	
Agent Name	
Agent Organisation	
<p>Do you consider the plan to be Legally Compliant? * Yes * No</p>	
<p>Has the duty to cooperate been met? * Yes * No</p>	
<p>Do you consider the plan to be Sound? * Yes * No</p>	
<p>Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy</p>	
Explanation	To whom it may concern, we are registering our opposition to the above policies. We have lived at Hillside for 30 years, and it seems that due to the planning application, the quiet cul de sac we live in, is to be turned into a major route for the properties you are planning. My partner suffers with mental health issues, and noise is one of her issues. Based upon your plan, it seems that this will be going on for a number of years, which will force us to move to another area, which the council will have to provide an adequate property, a bungalow, because she is also disabled with spina bifida. We have also had Railway close built directly at the back of us, so close that a recent fire near to us caused damage to both the property concerned and a property at Railway close. It also appears that to gain access to the development, that you will likely have to create a thoroughfare at Hillside, which will mean ripping out a layby which is used with great frequency for everything from vehicles turning to oil deliveries, that will cause major disruption. It is noted that there should be a school pick up and drop off point.
Modifications requested	Would it not be better if the school actually had their own car park within the grounds to alleviate the problem of school parking on the

	main road. Also it would be a great deal noisier, than is currently the case as this would affect my sleep as I start work at 5.30 am, and have to be in bed a great deal earlier than most. Due to families with young children being housed in and around Hillside, who play in the road, that is an accident waiting to happen.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land East of Astley Primary School
Consultation Point Number	Policy BRI01
Section of the Plan	Policy BRI01 Land East of Astley Primary School
ID	LPS517
Response Date	29/01/2022 08:01:00
Name	Ms Louise Tarling
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Please could someone contact me regarding the planning of the houses mentioned above. I am slightly concerned that the route that seems to be implied for access isn't suitable for all the traffic, even if it's on a one way system in and another exit route out or the other way round. There are far too many cars currently parked on the road way along hillside already making a small road very busy and a nice way for children to walk to school by getting off the main road that is already extremely busy. And the road also will not take construction traffic it's already in a poor state with pot holes emerging and is obviously not where on a priority list to having the faults repaired so to worsen this road with all the possible traffic is very unfair on all of the residents in and around this area.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land East of Astley Primary School
Consultation Point Number	Policy BRI01
Section of the Plan	Policy BRI01 Land East of Astley Primary School
ID	LPS525
Response Date	30/01/2022 11:37:00

Name	Ms Cindy Myhill
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>I'm writing on behalf off my mother who is a resident at hillside she's live there happily for 26 years we have been informed off the proposed 65 houses near astley school, with proposed access to them thru hillside road this is totally unacceptable the quiet cul-de-sac will turn into a main road and a car park for the school children parents to collect and drop off their children the road isn't wide enough for this.</p> <p>Most off the bungalows have cars parked in front off them now as no one has off road parking and adding to the traffic from 65 homes most will have 2 cars, the volume off traffic will be horrendous the noise the pollution and the dangers!!!!</p> <p>Visiting my mum will be so much more difficult as I have too get her wheelchair in the car I'll probably be unable to park at the front off her home to do this and get her safely in and out.</p>
Modifications requested	<p>The other proposed entrance will be off the main road this is a more accessible acceptable option.</p> <p>To add insult to injury what about the lorries when they start building the road again isn't suitable for large heavy vehicles such as these the noise daily will impact on the residents lives too I urge you too reconsider using hillside road for the main route to these properties and use the main fakenham road by putting a roundabout in this will also help with the speedy traffic pass the school I'm sure a much most acceptable option and leave the residents off hillside in peace & quiet that they deserve.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land East of Astley Primary School
Consultation Point Number	Policy BRI01
Section of the Plan	Policy BRI01 Land East of Astley Primary School
ID	LPS526
Response Date	28/01/2022 20:28:00
Name	Mr Alan Palmer
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	

Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Local people have been made aware of your intentions to a request for planning permissions for the construction of new homes either side of Astley School. Should planning permission be allowed it would be catastrophic for the local area and its people. Hillside in particular and the roads off it simply couldn't cope and the peace and quiet currently enjoyed would be gone forever. The current roads into Melton and Briston are currently in a disgraceful state with pot holes, no proper markings, no cats eyes and lighting inadequate. Accidents are already on the increase with two very serious accidents within 3 to 4 weeks. Both accidents hushed up!
Modifications requested	It's hard to believe that the council would even consider the request and I sincerely hope common sense will take hold. I'm hoping your decision makers visit the area and keep our MP Duncan Baker in the loop.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land East of Astley Primary School
Consultation Point Number	Policy BRI01
Section of the Plan	Policy BRI01 Land East of Astley Primary School
ID	LPS554
Response Date	17/02/2022 15:25:00
Name	Mr Steve Pickering
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	I am not completely against new homes being built, as I know they have to be built somewhere, however I understand that someone has come up with the idea that access to this estate will be via Hillside, between numbers 33 and 35. This I believe is an extremely disturbing development. Effectively turning a quiet road, which is not capable of handling too much in the way of additional traffic. There will be potentially an additional 130 cars using it. It isn't a wide road, and children play there safely in the

	knowledge that they are very likely to get run over. There are a lot of elderly people living in retirement homes, which I doubt will feel safe with the additional noise and traffic. There will also be the addition of road and light pollution in what is a very quiet part of Bristol.
Modifications requested	Why can't a turning be made into the estate off the Fakenham road? I also hope that there will be some additional parking for the school in the proposal as well as new roads laid at the developers expense in any proposal, where their lorries have ripped the current one's up. This has to be agreed, as I am sure the council won't foot the bill for repairing them or any car repairs that result from unfit roads dug up by lorries going up and down into any building site.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land East of Astley Primary School
Consultation Point Number	Policy BRI01
Section of the Plan	Policy BRI01 Land East of Astley Primary School
ID	LPS743
Response Date	28/02/2022 08:14:00
Name	Mrs Debbie Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>Whilst there are no designated heritage assets within the site, the Grade II listed Manor Farmhouse lies to the north east of the site. Any development of this site has the potential to impact upon the setting of the listed building. There is no reference to this listed building in the supporting text or policy. The policy and paragraph should be amended accordingly. Coalescence of settlements is to be avoided. It is important to maintain the character and distinctiveness of settlements.</p> <p>We welcome the preparation of a Heritage Impact Assessment in the Historic Environment Topic Paper. This provides robust evidence of the potential impact on the historic environment and suggests appropriate mitigation measures.</p> <p>The HIA sets out appropriate policy wording for inclusion in the Plan (see page 238).</p> <p>However, unfortunately this wording has not been included in the Plan. The policy needs amending to incorporate the wording from the HIA.</p> <p>In addition, the Key Development Considerations diagram on page 330 of the Historic Environment Paper should be included in the Plan. The diagram shows the heritage mitigation measures proposed for the site.</p>
Modifications requested	Add criterion from HIA to read: Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both

	<p>within the site and the wider area including, Manor Farmhouse, a grade II listed building. Development should include the following mitigation measures (as set out in further detail in the Heritage Impact Assessment):</p> <ul style="list-style-type: none"> • Respect and reflect the massing and heights of surrounding dwellings and buildings, many of which are single and one and a half storeys in height; • Existing hedgerows / landscaping to be retained and enhanced on the eastern, western and southern boundaries and preferably on northern boundary depending on access arrangements; • Open space should be located in the south-western area of the site, incorporating the existing pond. <p>Also add diagram.</p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land East of Astley Primary School
Consultation Point Number	Policy BRI01
Section of the Plan	Policy BRI01 Land East of Astley Primary School
ID	LPS714
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
<p>Do you consider the plan to be Legally Compliant? * Yes * No</p>	Yes
<p>Has the duty to cooperate been met? * Yes * No</p>	Yes
<p>Do you consider the plan to be Sound? * Yes * No</p>	Yes
<p>Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy</p>	
Explanation	<p>Sound.</p> <p>Natural England supports the retention of priority ponds and the creation of green infrastructure to support biodiversity. Priority habitats, ancient woodland, and associated species should also be considered to assess the impact of the development proposals on local wildlife, in line with paragraphs 175 and 176 of the NPPF.</p>
Modifications requested	
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	
Justification for appearing at hearing	
Attachment(s)	

Consultation Point Title	Land West of Astley Primary School
Consultation Point Number	Policy BRI02
Section of the Plan	BRI02
ID	LPS39
Response Date	01/02/2022 15:22:01
Name	Ian Ruston
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	In your Policy for BRI02 item 2 you suggest 'Provision of a convenient and safe vehicular access from either Fakenham Road or Hillside;'. Whilst I agree with vehicular access from Fakenham Road I do not think access from Hillside for vehicles is safe and therefore is not sound. Hillside , when constructed was provided for a number of older peoples bungalows with a few garages for those who have cars. It is not a wide road and is restricted by the newer occupants who have families particularly parking cars on the roadway and footpaths leaving restricted access and access for an additional 40 houses would cause danger to occupiers and particularly children. Hillside exits onto Fakenham Road adjacent to Ekes Garage. Traffic here consists of those vehicles from Hillside itself as well as houses built in Burston Close and also those from the Lomax and Fairstead estates via Wellington Road as well as very large farm vehicles and tractors at times using the lobe at the junction of Hillside and Wellington Road. The addition of traffic from another 40 houses using Hillside therefore I see as creating an extra danger at this junction.
Modifications requested	The entrance to BRI02 should be chosen to be onto Fakenham Road and could be the same entrance as that which is proposed to give parking for those vehicles collecting and dropping off children attending the school.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Astley Primary School
Consultation Point Number	Policy BRI02
Section of the Plan	Policy BRI02 Land West of Astley Primary School
ID	LPS23
Response Date	22/01/2022 13:26:00
Name	Mr David Throup
Organisation	

Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	The plan for BRI02 access from Hillside is not sound. To use both Fakenham Road and Hillside as points of access would create a large circular route. Hillside is generally clogged with residential parking. Additional vehicular activity would create congestion and risk to the generally older population. Creating access to the proposed development would require to create a road between existing dwellings across open ground, creating a traffic flow where none previously existed and of no value to the existing community The plan has been increased to 40 dwellings rather than the original 32. Will this increase in dwellings be at the expense of the required parking for school set down and pick up.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Astley Primary School
Consultation Point Number	Policy BRI02
Section of the Plan	Policy BRI02 Land West of Astley Primary School
ID	LPS29
Response Date	26/01/2022 10:57:00
Name	Mrs Maggie Deeley
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively preparedIt is not justified
Explanation	Whist I support the need for housing and also affordable housing in Briston for local people, after visiting the roadshow on the Local plan at the Briston Pavilion Thursday 9th May 2019, and now reading the

	<p>proposed plan, I have to say I am most concerned at the level of development planned for the village.</p> <p>65 houses either side of Astley School – that is going to mean 50+ cars exiting onto the Fakenham road, either via The Lane or associated roads which already struggle at peak school time. How this can be seen to follow Green policies I don't know, the pollution will increase.</p> <p>It should be also noted that there have been numerous accidents on Fakenham Road, the most recent last Friday, 21st January 2021, involving a motorbike, lorry and a car</p> <p>Unfortunately, big lorries thunder through our village on their way to the farms and associated services. I know I was told that parking will be addressed but people will want to park outside their homes. At peak times, it is difficult to negotiate past Astley school – I agree that the pull in bays help, but it is still an issue. There is also the issue of only having a footpath on one side of the Fakenham road.</p> <p>NNDC has recently approved planning permission for 9 houses off the The Lane in Briston behind Holly House, thier access, looking at the plans, will be onto The Lane as well (PF/19/1648) this is then upping the amount planning to be built to in the time period to 74 houses.</p> <p>I appreciate the issues need to be addressed, but can Briston really support 74 houses without destroying the character of our village? I think not</p>
Modifications requested	<p>A full traffic survey needs to done and published, due to the access issues onto The Lane and Fakenham Road.</p> <p>The proposal needs to reduced by at least two thirds to reduce congestion, pollution (especially outside a school) and accidents.</p> <p>There are no employment opportunities in the village so workers will have to travel further afield therefore increasing traffic movements.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Astley Primary School
Consultation Point Number	Policy BRI02
Section of the Plan	Policy BRI02 Land West of Astley Primary School
ID	LPS57
Response Date	07/02/2022 23:02:41
Name	Mr Craig Lemon
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared	It is not effective

<ul style="list-style-type: none"> * It is not effective * It is not justified * It is not consistent with national policy 	
Explanation	<p>Has a Inspector actually got out of their chair to visit site and assess the possibility of access through Hillside or has this been done via google maps and it looks like a good/convenient idea?.</p> <p>Im going to be blunt Im a resident on Hillside so am fully aware of the area, so some will call me Bias in my views, but Im not against house building, I understand the need. But there is "clever thought about building" and then the "quick get it up" building at any cost.</p> <p>When I moved into Hillside 16 years ago the surrounding residents were mostly elderly with no cars, over time the demographic is changing to family's with on average two cars. Lets also put this in perspective, Hillside is owned by Victory housing, I am privately owned, but the road, grass verge and pavements are all Victory housings, (this was explained to me via Victory housing after a parking dispute) and are in a very poor state of repair, roads and pavements breaking up, these dating back to the 1950/60s when constructed. Victory doesn't spend money on maintain them, as a example there is a loose kerb stone on Burston close entrance its been like it for years , nothing gets done. Highways are not interested as it a unadopted road as I have spoken to them.</p> <p>We are not permitted to park on the grass verges outside our property's by decree of Victory housing. We are expected to park on the road, however the road is not wide enough to park one car opposite another and allow traffic to flow. So my point is as more residents come in with more cars on both sides the road is going to be more congested so vehicles will not get through. At the best of times due to peoples parking its only wide enough for one car inplaces. The road is not gritted in winter and great caution needs to be taken when going down the hill. If a accident ocured here this blocks all estate accesses.</p> <p>Hillside is currently a cul-de-sac so kids play and ride bikes, play football in the road and green areas, if this became access to a new estate/school think of the race track it will become for people to speed along, this includes the new school traffic it would potentially bring as hillside would now become a cut through to the school.</p> <p>Hillside already serves Burston Close, Plantation Hill (Iomax estate) and obviously Hillside's own traffic which again is increasing as new folk come in. Some careful thought should have be given before deciding that Hillside maybe a access to this development, why not visit at the end of a working day or the weekend when all residents are at home to ascertain road issues before the possibility of the road becoming, in my opinion Dangerous. There is also the possibilty of the new estate being extended to the south at some point so more traffic?. If this estate does go ahead access should be onto fakenham road as it's already two lanes and maintained by highways and gritted during winter by highways, Hillside has none of the above.</p>
Modifications requested	Access should be onto fakenham road as it's already two lanes and maintained by highways and gritted during winter by highways. Maybe a mini roundabout at the entrance to the new estate to help with traffic flow east to west. A decent size parking area would get pick up and drop off school traffic off the main road and reduce hold ups.
Appear at examination hearing session(s)? <ul style="list-style-type: none"> * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s) 	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Astley Primary School
Consultation Point Number	Policy BRI02
Section of the Plan	Policy BRI02 Land West of Astley Primary School
ID	LPS552
Response Date	08/02/2022 14:22:00
Name	Mrs Karen Kinsley
Organisation	

Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	As a resident of woodfield, briston i am emailing with concerns of new houses hoping to be built either side of school. I am concerned that there will be even more cars parking outside the school and if the school is big enough for more students and also more people adding to the doctors list as its hard enough to get an appointment at my local doctors and not being sent to holt or further away.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Astley Primary School
Consultation Point Number	Policy BRI02
Section of the Plan	Policy BRI02 Land West of Astley Primary School
ID	LPS464
Response Date	07/03/2022 17:10:00
Name	Mr Richard Waddingham
Organisation	
Agent Name	Mrs Phoebe Heath
Agent Organisation	Bidwells LLP
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	SEE ATTACHED FILE Within Point 1 of the proposed wording of Policy BRI02, considerations are required to the site setting along Fakenham Road. The wording of Point 1 is, in principle, supported. However, the wording should be amended to allow an alternative design approach if this is identified

	<p>as more practical and feasible through the progression of detailed designs for the site.</p> <p>Accordingly, Point 1 should be amended to state: '1. Setting back of development from the road frontage along Fakenham Road, unless an alternative design approach is identified as more practical and feasible'. This change will ensure that the policy is both justified and effective.</p> <p>The provision of a car parking area for the school (pick up and drop off) is required under Point 3 of the proposed policy wording. However, given that both Policy BRI01 and BRI02 have the requirement for a car parking area for the adjacent Astley School, we feel parking provision is not required across both of the sites. Therefore, point 3 should be amended to require the provision of a car park, unless already provided on an alternative site.</p> <p>Accordingly, Point 3 should be amended to reflect: '3. Provision of a car parking area for the school (pick up and drop off), unless already provided on an alternative site'. This change will ensure that the policy is both justified and effective.</p> <p>Point 7 of the wording of proposed Policy BRI02 requires on-site delivery of not less than 0.10 hectares of public open space on the site frontage with Fakenham Road. The wording of Point 7 is, in principle, supported. However, as previously noted regarding Point 1, the wording should be amended to allow an alternative design approach if this is identified as more practical and feasible through the progression of detailed designs for the site.</p> <p>Accordingly, Point 7 should be amended to state: '7. On-site delivery of approximately 0.10 hectares of public open space on the site frontage with Fakenham Road, unless an alternative design approach is identified as more practical feasible'. This change will ensure that the policy is both justified and effective.</p> <p>Point 9 of the proposed wording seeks the retention and enhancement of existing hedgerows to all site boundaries, particularly to the east and west. The wording of point 9 is, in principle, supported. However, the policy should make it clear that removal of certain hedges is likely to be required to facilitate access to the site and ensure adequate visibility splays can be provided.</p> <p>Therefore, Point 9 should be amended to state: '9. Retention and enhancement of existing hedgerows and landscaping to all the site boundaries particularly to the east and west, except where removal is required to facilitate access'. This change will ensure that the policy is both justified and effective.</p>
Modifications requested	<p>SEE ATTACHED FILE</p> <p>Accordingly, to ensure the Policy is both justified and effective, the amendments identified below would be required. The proposed amendments to the Policy are in bold, while the proposed text to be removed are in Strikethrough.</p> <p>1. Setting back of development from the road frontage along Fakenham Road, unless an alternative design approach is identified as more practical and feasible;</p> <p>3. Provision of a car parking area for the school (drop-off and pick-up) unless already provided on an alternative site;</p> <p>7. On-site delivery of not less than approximately 10 hectares of public open space on the site frontage with Fakenham Road, unless an alternative design approach is identified as more practical on site;</p> <p>9. Retention and enhancement of existing hedgerows and landscaping to all the site boundaries particularly to the east and west, except where removal is required to facilitate access; and,</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	I reserve the right to appear prior to publication of the draft agendas that will set out the Inspector's matters and questions to form the basis of the discussions at the Hearings. The intention to appear is to seek to ensure that the Policy can be made sound, if required.
Attachment(s)	Briston - Land to the West of Asley Primary School.pdf
Consultation Point Title	Land West of Astley Primary School
Consultation Point Number	Policy BRI02

Section of the Plan	Policy BRI02 Land West of Astley Primary School
ID	LPS550
Response Date	20/01/2022 22:25:00
Name	Grenville Whaling & Christine Allison
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	To whom it may concern, we are registering our opposition to the above policies. We have lived at Hillside for 30 years, and it seems that due to the planning application, the quiet cul de sac we live in, is to be turned into a major route for the properties you are planning. My partner suffers with mental health issues, and noise is one of her issues. Based upon your plan, it seems that this will be going on for a number of years, which will force us to move to another area, which the council will have to provide an adequate property, a bungalow, because she is also disabled with spina bifida. We have also had Railway close built directly at the back of us, so close that a recent fire near to us caused damage to both the property concerned and a property at Railway close. It also appears that to gain access to the development, that you will likely have to create a thoroughfare at Hillside, which will mean ripping out a layby which is used with great frequency for everything from vehicles turning to oil deliveries, that will cause major disruption. It is noted that there should be a school pick up and drop off point.
Modifications requested	Would it not be better if the school actually had their own car park within the grounds to alleviate the problem of school parking on the main road. Also it would be a great deal noisier, than is currently the case as this would affect my sleep as I start work at 5.30 am, and have to be in bed a great deal earlier than most. Due to families with young children being housed in and around Hillside, who play in the road, that is an accident waiting to happen.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Astley Primary School
Consultation Point Number	Policy BRI02
Section of the Plan	Policy BRI02 Land West of Astley Primary School
ID	LPS551
Response Date	29/01/2022 08:01:00
Name	Ms Louise Tarling
Organisation	
Agent Name	

Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Please could someone contact me regarding the planning of the houses mentioned above. I am slightly concerned that the route that seems to implied for access isn't suitable for all the traffic, even if it's on a one way system in and another exit route out or the other way round. There are far to many cars currently parked on the road way along hillside already making a small road very busy and a nice way for children to walk to school by getting off the main road that is already extremely busy. And the road also will not take construction traffic it's already in a poor state with pot holes emerging and is obviously no where on a priority list to having the faults repaired so to worsen this road with all the possible traffic is very unfair on all of the residents in and around this area.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Astley Primary School
Consultation Point Number	Policy BRI02
Section of the Plan	Policy BRI02 Land West of Astley Primary School
ID	LPS553
Response Date	30/01/2022 11:37:00
Name	Ms Cindy Myhill
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	I'm writing on behalf off my mother who is a resident at hillside she's live there happily for 26 years we have been informed off the proposed 65 houses near astley school, with proposed access to them thru hillside road this is totally unacceptable the quiet cul-de-sac will turn

	<p>into a main road and a car park for the school children parents to collect and drop off their children the road isn't wide enough for this.</p> <p>Most off the bungalows have cars parked in front off them now as no one has off road parking and adding to the traffic from 65 homes most will have 2 cars, the volume off traffic will be horrendous the noise the pollution and the dangers!!!!</p> <p>Visiting my mum will be so much more difficult as I have too get her wheelchair in the car I'll probably be unable to park at the front off her home to do this and get her safely in and out.</p>
Modifications requested	<p>The other proposed entrance will be off the main road this is a more accessible acceptable option.</p> <p>To add insult to injury what about the lorries when they start building the road again isn't suitable for large heavy vehicles such as these the noise daily will impact on the residents lives too I urge you too reconsider using hillside road for the main route to these properties and use the main fakenham road by putting a roundabout in this will also help with the speedy traffic pass the school I'm sure a much most acceptable option and leave the residents off hillside in peace & quiet that they deserve.</p>
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Astley Primary School
Consultation Point Number	Policy BRI02
Section of the Plan	Policy BRI02 Land West of Astley Primary School
ID	LPS555
Response Date	17/02/2022 15:25:00
Name	Mr Steve Pickering
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	
* Yes	
* No	
Has the duty to cooperate been met?	
* Yes	
* No	
Do you consider the plan to be Sound?	
* Yes	
* No	
Reason(s) not Sound	
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	<p>I am not completely against new homes being built, as I know they have to be built somewhere, however I understand that someone has come up with the idea that access to this estate will be via Hillside, between numbers 33 and 35.</p> <p>This I believe is an extremely disturbing development. Effectively turning a quiet road, which is not capable of handling too much in the way of additional traffic. There will be potentially an additional 130 cars using it. It isn't a wide road, and children play there safely in the knowledge that they are very likely to get run over. There are a lot of elderly people living in retirement homes, which I doubt will feel safe with the additional noise and traffic. There will also be the addition of road and light pollution in what is a very quiet part of Briston.</p>
Modifications requested	<p>Why can't a turning be made into the estate off the Fakenham road? I also hope that there will be some additional parking for the school in</p>

	the proposal as well as new roads laid at the developers expense in any proposal, where their lorries have ripped the current one's up. This has to be agreed, as I am sure the council won't foot the bill for repairing them or any car repairs that result from unfit roads dug up by lorries going up and down into any building site.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Astley Primary School
Consultation Point Number	Policy BRI02
Section of the Plan	Policy BRI02 Land West of Astley Primary School
ID	LPS744
Response Date	28/02/2022 08:14:00
Name	Mrs Debbie Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>Whilst there are no designated heritage assets on this site, development of this site (and BRI01) would remove an important gap and separation between the villages of Melton Constable and Briston. Consideration should also be given to the issue of coalescence of settlements.</p> <p>We welcome the preparation of a Heritage Impact Assessment in the Historic Environment Topic Paper. This provides robust evidence of the potential impact on the historic environment and suggests appropriate mitigation measures.</p> <p>The HIA sets out appropriate policy wording for inclusion in the Plan (see page 244).</p> <p>However, unfortunately this wording has not been included in the Plan. The policy needs amending to incorporate the wording from the HIA. We appreciate that criterion 2 of the policy does include some protection for the historic environment, but this falls short of the recommendations of the HIA.</p> <p>In addition, the Key Development Considerations diagram on page 331 of the Historic Environment Paper should be included in the Plan. The diagram shows the heritage mitigation measures proposed for the site.</p>
Modifications requested	<p>Add criterion from HIA to read: Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area including, Manor Farmhouse, a grade II listed building. Development should include the following mitigation measures (as set out in further detail in the Historic Impact Assessment):</p> <ul style="list-style-type: none"> • Take account of the coalescence of settlements by providing landscaping to the eastern boundary by strengthening and enhancing

	<p>the existing boundary treatment to create a physical gap in the built form between the two settlements</p> <ul style="list-style-type: none"> • Respect and reflect the massing and heights of surrounding dwellings and buildings, which are a mixture of single and two storeys • Existing hedgerows / landscaping to be retained and enhanced on the western and northern boundaries • Landscaping to the eastern boundary should be extended and enhanced to create a gap between the settlements • Open space should be located on the eastern boundary to further create a gap between the settlements <p>The policy should be amended to read, Development should preserve the grade II listed Manor Farmhouse and its setting.</p> <p>Also add diagram.</p>
<p>Appear at examination hearing session(s)?</p> <p>* No, I do not wish to participate in examination hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land West of Astley Primary School
Consultation Point Number	Policy BRI02
Section of the Plan	Policy BRI02 Land West of Astley Primary School
ID	LPS715
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
<p>Do you consider the plan to be Legally Compliant?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Has the duty to cooperate been met?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Do you consider the plan to be Sound?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Reason(s) not Sound</p> <p>* It is not positively prepared</p> <p>* It is not effective</p> <p>* It is not justified</p> <p>* It is not consistent with national policy</p>	
Explanation	<p>Sound.</p> <p>Natural England supports the retention of priority ponds and the creation of green infrastructure to support biodiversity. Priority habitats, ancient woodland, and associated species should also be considered to assess the impact of the development proposals on local wildlife, in line with paragraphs 175 and 176 of the NPPF.</p>
Modifications requested	
<p>Appear at examination hearing session(s)?</p> <p>* No, I do not wish to participate in examination hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
Justification for appearing at hearing	
Attachment(s)	

Consultation Point Title	Ludham
Consultation Point Number	20
Section of the Plan	20.0.2 - 20.0.03
ID	LPS348
Response Date	04/03/2022 14:44:17
Name	Miss Natalie Beal
Organisation	Broads Authority
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Ludham, para 20.0.2 and 20.0.03 references to the 'Norfolk Broads' change to Broads Authority Executive Area?
Modifications requested	Ludham, para 20.0.2 and 20.0.03 references to the 'Norfolk Broads' change to Broads Authority Executive Area?
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Ludham
Consultation Point Number	20
Section of the Plan	20 Ludham
ID	LPS395
Response Date	07/03/2022 12:00:14
Name	
Organisation	D L Ritchie Will Trust
Agent Name	David Jones
Agent Organisation	Armstrong Rigg Planning
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared	It is not positively preparedIt is not effective; It is not justified

* It is not effective * It is not justified * It is not consistent with national policy	
Explanation	SEE ATTACHED FILE
Modifications requested	SEE ATTACHED FILE
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To take part in discussions
Attachment(s)	Enclosure 8 - Strategy for Ludham - Policies LUD06A and LUD01A.pdf
Consultation Point Title	Ludham
Consultation Point Number	20
Section of the Plan	20 Ludham (20.0.1 - 20.2.3)
ID	LPS329
Response Date	04/03/2022 17:37:25
Name	
Organisation	Church Commissioners for England
Agent Name	Mr Ollie Eyre
Agent Organisation	Deloitte
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not justified
Explanation	<p>SEE ATTACHED FILE</p> <p>The Church Commissioners for England note that within the Regulation 19 draft there are only two allocations in Ludham:</p> <ul style="list-style-type: none"> Land South of School Road (Site Allocation Ref. LUD01/A), which is allocated for approximately 20 new dwellings over the Plan period; and Land South of Grange Road (Site Allocation Ref. LUD06/A), which is allocated for approximately 15 new dwellings over the Plan period. <p>The Commissioners have promoted their land interests in Ludham for a number of years and have played an active role in the plan-making process.</p> <p><u>Proposed Allocations in Ludham</u></p> <p>Ludham is a village located to the south east of North Norfolk. There is very little previously developed (brownfield) land in Ludham. New greenfield allocations are therefore necessary in order to deliver the required share of growth in North Norfolk.</p> <p>The Regulation 19 draft Local Plan defines Ludham as a Large Growth Village in the settlement hierarchy and states that these areas are recognised for their role as local service centres to other nearby villages and for the support they provide to rural sustainability.</p> <p>The Regulation 19 draft Local Plan states that Large Growth Villages are suitable for limited growth. Ludham is identified as suitable for 35 dwellings over 2 development sites (20 dwellings and 15 dwellings, respectively).</p>

Both of these two sites are already allocated for residential development in the adopted Plan but have not been developed. Therefore, the Council intends to roll these forward into the new Local Plan.

However, the reason for the reallocation of these sites is not clear. This is especially pertinent for the "Land South of School Road", which was defined as unsuitable in the 2017 HELAA for the following reasons:

- Parts of the Site fall within Flood Zone 2;
- The site is within a moderately sensitive landscape area;
- Local road network is suitable; and
- Public footpath provision is insufficient.

The justification provided in the Regulation 19 Sustainability Appraisal states that "*part of the [Land South of School Road] is considered suitable and has been identified as a preferred option*". However, this is not consistent with the 2017 HELAA which stated the site is unsuitable for the reasons outlined above.

The Sustainability Appraisal states that the Proposed Allocations "*can deliver sufficient housing for Ludham*". Despite this assurance, neither site was developed in the previous Plan period.

The Council has failed to justify the re-allocation of the Ludham sites from the previous Plan and explained why it considers that the sites will now be delivered in this Plan period.

It is the Commissioners' view that to include these sites is not justified and therefore not consistent with paragraph 35 of the NPPF.

Land South of Norwich Road, East of Lovers Lane, Ludham

Site Location and Description

As previously set out within the Planning Overview Document prepared by WYG and submitted in the 2016 'Call for Sites' exercise, 'Land South of Norwich Road, East of Lovers Lane' comprises approximately 5.3 hectares (ha) and is made up of arable agricultural land. Please refer to the attached which includes a site location plan.

The proposed development area is classified as Grade 2 agricultural land by the Natural England Agricultural Land Classification Map Eastern Region.

There are no designated heritage assets on or immediately adjoining the site, with the nearest assets comprising the Church of St Catherine (Grade I listed) and FH Chambers Memorial (Grade II listed), to the east of the Site. Part of the site (to the east) is located within the Ludham Conservation Area.

The site slopes gently from the north-west to the south east.

The site has not been previously developed and therefore no contamination constraints are expected. There are no existing buildings or structures on the site.

The site is in single ownership, meaning there are no significant obstacles to overcome to ensure delivery of development.

The majority of the site is in Flood Zone 1 and is therefore at low risk of flooding. The part of the site to the south and east which is not proposed for development is in Flood Zones 2 and 3 and has been identified as having the potential to form part of the public open space for the site.

Access

Current access to the site is via a field gate on Norwich Road as well as two accesses via Lovers Lane, one of which is a field gate and the other an open access.

Access to the site can be achieved on Norwich Road from a gap within the hedgerow, on the western end of the site frontage.

The village facilities are within a comfortable walking distance of the site as they are within 1km. At present a footway is located on the southern side of Norwich Lane, adjacent to the site

Previous Representations

Representations have been previously been made in the 2016 'Call for Sites' exercise, and in the 2019 'Local Plan Part 1' and 'Call for Sites in Villages' consultations.

The 2017 HELAA assessment identified several possible constraints of the site, including access, flood risk, and a lack of pedestrian links.

As we have already demonstrated through submissions to earlier consultations, these matters can all be addressed, and they should not be cited as reasons for not allocating the site for development.

	The site remains a sustainable location for future housing growth commensurate in scale to the requirements of the settlement.
Modifications requested	SEE ATTACHED FILE The Council has failed to justify the re-allocation of the Ludham sites from the previous Plan and explained why it considers that the sites will now be delivered in this Plan period. This needs addressing in order for the policy to be justified. Please see attached for further detail.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	The Church Commissioners for England have been engaged throughout the plan making process and still have outstanding concerns regarding the soundness of the plan.
Attachment(s)	North Norfolk Reg 19 Draft Repts LEP and EQAR Reviewed.pdf (2)

Policy LUD01/A Land South of School Road

Consultation Point Title	Land South of School Road
Consultation Point Number	Policy LUD01/A
Section of the Plan	Policy LUD01/A Land South of School Road
ID	LPS397
Response Date	07/03/2022 12:05:00
Name	
Organisation	D L Ritchie Will Trust
Agent Name	David Jones
Agent Organisation	Armstrong Rigg Planning
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	SEE ATTACHED FILE
Modifications requested	SEE ATTACHED FILE
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To take part in discussions
Attachment(s)	Enclosure 8 - Strategy for Ludham - Policies LUD06A and LUD01A.pdf (2)
Consultation Point Title	Land South of School Road
Consultation Point Number	Policy LUD01/A
Section of the Plan	Policy LUD01/A Land South of School Road
ID	LPS702
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective	

* It is not justified * It is not consistent with national policy	
Explanation	Sound – Subject to project level HRA This policy supports residential developments which may result in an increase in recreational use of designated sites. This allocation will also feed into Ludham WRC and ultimately discharged into the Broads SAC, Broadland SPA and Ramsar. Due to the surface water ingress concerns highlighted in the plan's HRA, we agree that a site-specific Water Catchment and Foul Water Drainage Strategy, as well as the enhancement of sewage infrastructure to deal with such concerns, should be undertaken prior to the development proposal proceeding. Furthermore, a project level HRA should also take place to determine no likely significant effects, both hydrological and recreational, of the development on the protected sites.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Policy LUD06/A Land At Eastern End Of Grange Road

Consultation Point Title	Land At Eastern End Of Grange Road
Consultation Point Number	Policy LUD06/A
Section of the Plan	Policy LUD06/A Land At Eastern End Of Grange Road
ID	LPS396
Response Date	07/03/2022 12:02:00
Name	
Organisation	D L Ritchie Will Trust
Agent Name	David Jones
Agent Organisation	Armstrong Rigg Planning
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective
Explanation	SEE ATTACHED FILE
Modifications requested	SEE ATTACHED FILE
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	To take part in discussions
Attachment(s)	Enclosure 8 - Strategy for Ludham - Policies LUD06A and LUD01A.pdf (1)
Consultation Point Title	Land At Eastern End Of Grange Road
Consultation Point Number	Policy LUD06/A
Section of the Plan	Policy LUD06/A Land At Eastern End Of Grange Road
ID	LPS703
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective	

* It is not justified * It is not consistent with national policy	
Explanation	Sound – Subject to project level HRA This policy supports residential developments which may result in an increase in recreational use of designated sites. This allocation will also feed into Ludham WRC and ultimately discharged into the Broads SAC, Broadland SPA and Ramsar. Due to the surface water ingress concerns highlighted in the plan's HRA, we agree that a site-specific Water Catchment and Foul Water Drainage Strategy, as well as the enhancement of sewage infrastructure to deal with such concerns, should be undertaken prior to the development proposal proceeding. Furthermore, a project level HRA should also take place to determine no likely significant effects, both hydrological and recreational, of the development on the protected sites.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Policy MUN03/B Land off Cromer Road & Church Lane

Consultation Point Title	Land off Cromer Road & Church Lane
Consultation Point Number	Policy MUN03/B
Section of the Plan	Policy MUN03/B Land off Cromer Road & Church Lane
ID	LPS145
Response Date	23/02/2022 16:33:00
Name	Miss Naomi Chamberlain
Organisation	Norfolk County Council - Highway Authority (Engineer (Major & Estate Development))
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Policy MUN03/B point 3 requires delivery of a highway access from Cromer Road. The alignment of Cromer Road may present challenges and it has not been demonstrated that an acceptable access can be provided at that frontage, Church Lane may need to be considered as an alternative.
Modifications requested	Policy MUN03/B, point 3 should be revised to enable provision of a highway access at Cromer Road, or if not feasible, at Church Lane, to the satisfaction of the Highway Authority.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land off Cromer Road & Church Lane
Consultation Point Number	Policy MUN03/B
Section of the Plan	Policy MUN03/B Land off Cromer Road & Church Lane
ID	LPS214
Response Date	24/02/2022 10:11:32
Name	Miss Naomi Chamberlain
Organisation	Norfolk County Council - Highway Authority (Major & Estate Development)
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes	

* No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	Policy MUN03/B point 4 is unclear. The development should provide a continuous frontage footway at Church Lane from Cromer Road, to join with existing footway at Station Road.
Modifications requested	Policy MUN03/B, point 4 should be revised to require a continuous footway at the Church Lane site frontage, along with off-site improvements to provide continuous footway at Church Lane, between Cromer Road and the existing footway at Station Road, to the satisfaction of the Highway Authority.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land off Cromer Road & Church Lane
Consultation Point Number	Policy MUN03/B
Section of the Plan	Policy MUN03/B Land off Cromer Road & Church Lane
ID	LPS211
Response Date	24/02/2022 09:59:45
Name	Miss Naomi Chamberlain
Organisation	Norfolk County Council - Minerals & Waste Policy
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not consistent with national policy
Explanation	Norfolk County Council in its capacity as the Mineral Planning Authority considers that Policy MUN03/B is currently unsound as it is inconsistent with national policy in relation to mineral resource safeguarding.
Modifications requested	The policy can be made sound by including the wording below, which was included in the response by the Mineral Planning Authority, to the Regulation 18 sites consultation in May 2019. 'The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.'
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s)	No, I do not wish to participate in examination hearing session(s)

* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land off Cromer Road & Church Lane
Consultation Point Number	Policy MUN03/B
Section of the Plan	Policy MUN03/B Land off Cromer Road & Church Lane
ID	LPS215
Response Date	24/02/2022 10:15:52
Name	Miss Naomi Chamberlain
Organisation	Norfolk County Council - Highway Authority (Major & Estate Development)
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	The Cromer Road junction with Church Lane does not meet current standards and requires improvement to enable it to safely accommodate increased pedestrian and vehicular traffic arising from the development.
Modifications requested	Policy MUN03/B must include a requirement to improve the Cromer Road / Church Lane junction for vehicles and pedestrians, to the satisfaction of the Highway Authority.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land off Cromer Road & Church Lane
Consultation Point Number	Policy MUN03/B
Section of the Plan	Policy MUN03/B Land off Cromer Road & Church Lane
ID	LPS745
Response Date	28/02/2022 08:14:00
Name	Mrs Debbie Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes	

* No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>Whilst there are no designated heritage assets on this site, the site is adjacent to the Mundesley Conservation Area and opposite the Grade II listed All Saints Church. Any development therefore has the potential to impact upon these heritage assets and their settings. Criterion 1 refers to the Conservation Area and listed building which is welcomed.</p> <p>We welcome the preparation of a Heritage Impact Assessment in the Historic Environment Topic Paper. This provides robust evidence of the potential impact on the historic environment and suggests appropriate mitigation measures.</p> <p>The HIA sets out appropriate policy wording for inclusion in the Plan (see page 269).</p> <p>However, unfortunately this wording has not been included in the Plan. The policy needs amending to incorporate the wording from the HIA.</p> <p>We appreciate that criterion 1 of the policy does include some protection for the historic environment, but this falls short of the recommendations of the HIA.</p> <p>In addition, the Key Development Considerations diagram on page 333 of the Historic Environment Paper should be included in the Plan. The diagram shows the heritage mitigation measures proposed for the site. However, this diagram will need amending following the change to the site area.</p> <p>We also understand that the site area has changed since the HIA was undertaken. Ideally, the HIA should be amended to reflect the new site area.</p>
Modifications requested	<p>Amend policy to include wording from HIA:</p> <p>Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area including the view of the Church of All Saints a grade II listed building (from Church Lane) and the proximity and low level of the former railway villas within Mundesley Conservation Area in relation to the site. Development should include the following mitigation measures (as set out in further detail in the Heritage Impact Assessment):</p> <ul style="list-style-type: none"> • Given the elevated position of the northern part of the site, consideration should be given to the height and scale of new residential development in relation to the lower level adjacent dwellings to the east of the site. • The layout should also ensure for the retention and strengthening of as much existing landscaping as possible and in particular, the landscaping associated with the railway cutting on the eastern side of the site. • Any residential development should be set back from the eastern boundary to avoid the important view of the church when looking north along Church Lane. • The layout, scale and height of any new residential development should also take account of the Victorian Villas located on the east side of the site, which are set at a significantly lower level than the site, by not positioning any new dwellings too close to these existing properties and giving consideration to their orientation and height, in order that they would not dominate or overlook/ overshadow. <p>Include diagram from HIA in Local Plan.</p> <p>Update HIA to reflect new site area.</p>
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land off Cromer Road & Church Lane
Consultation Point Number	Policy MUN03/B

Section of the Plan	Policy MUN03/B Land off Cromer Road & Church Lane
ID	LPS695
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Sound – Subject to project level HRA. The policy supports residential developments which may result in an increase in recreational use of designated sites. In line with the plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Policy E7 Land at Tattersett Business Park

Consultation Point Title	Land at Tattersett Business Park
Consultation Point Number	Policy E7
Section of the Plan	Policy E7 Land at Tattersett Business Park
ID	LPS160
Response Date	23/02/2022 16:35:04
Name	Miss Naomi Chamberlain
Organisation	Norfolk County Council - Minerals & Waste Policy
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not consistent with national policy
Explanation	Norfolk County Council in its capacity as the Mineral Planning Authority considers that Policy E7 is currently unsound; as it is inconsistent with national policy in relation to mineral resource safeguarding.
Modifications requested	The policy can be made sound by including the wording below, which was included in the response by the Mineral Planning Authority, to the Regulation 18 sites consultation in May 2019. 'The site is partially underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.'
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	No, I do not wish to participate in examination hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land at Tattersett Business Park
Consultation Point Number	Policy E7
Section of the Plan	Policy E7 Land at Tattersett Business Park
ID	LPS235
Response Date	24/02/2022 11:51:00
Name	Ms Sarah Mitchell
Organisation	RSPB
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes
Has the duty to cooperate been met?	Yes

* Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective
Explanation	<p>The HRA states there is 'No LSE – Policy which could not have any conceivable effect on a site/Site is over 2km from River Wensum and no other European site within 10km.'</p> <p>We agree with the conclusion that a European site would not be impacted, but there would be likely impacts on a nationally important population of stone-curlews. Consequently, should the allocated area at Tattersett Business Park be developed the RSPB would be seriously concerned because of the use of the adjacent Sculthorpe Airfield by stone-curlews. The RSPB considers that development at this site is likely to disturb a protected species of European importance.</p> <p>During the period 2010-2019 an average of 10 pairs of stone-curlews nested each year at Sculthorpe Airfield, which is around 3% of the UK breeding population. In addition, stone-curlews may also nest near to the proposed development site in areas outside the airfield, but these areas have not been monitored in recent years and so data is not available. Sculthorpe Airfield is also one of the most important sites for post-breeding stone-curlews in the UK, where they gather in large numbers in the late summer and autumn prior to migration. In 2020 the post breeding flock at Sculthorpe Airfield numbered 99 birds, it is one of only a handful of sites that has attracted such a large gathering of stone-curlews.</p> <p>With regard to species listed on Annex I of the Birds Directive (such as stone curlew) where they occur outside designated sites, Regulation 10(8) of the UK's Conservation of Habitats and Species Regulations 2017 (as amended) requires competent authorities, in exercising their functions, to use all reasonable endeavours to avoid any pollution or deterioration of habitats of wild birds.</p> <p>Sculthorpe Airfield also supports populations of breeding lapwings, oystercatchers and Eurasian curlews, all species of conservation concern which may be affected by the allocation.</p> <p>Stone-curlews are highly sensitive to built development[1],[2], with harmful effects found at distances of up to 2000m, and highly sensitive to human disturbance at distances of up to 500m[3].</p> <p>[1] Sharp, J.; Clark, R.T.; Liley, D.; Green, R.E., 2008. The Effect of Housing Development and Roads on the Distribution of Stone curlews in the Brecks</p> <p>[2] Clark, R.; Liley, D., 2013. Further Assessment of the Relationship Between Buildingss and Stone curlew Distribution</p> <p>[3] Taylor, E.C., Green, R.E. & Perrins, J. (2007) Stone-curlews <i>Burhinus oedicnemus</i> and recreational disturbance: developing a management tool for access. <i>Ibis</i> 149, 37-44</p>
Modifications requested	<p>We suggest the Plan acknowledges the presence of stone-curlew at this site and the need for further assessments: Given the scale and location of the proposed allocation we would expect to see an Environmental Impact Assessment (EIA) as part of the development planning stage, and this should include an assessment of the effects of the development on breeding stone-curlews. The assessment will need to be informed by a search of historical stone-curlew records (which can be obtained from the RSPB) and a new stone-curlew survey on any suitable habitat outside of Sculthorpe Airfield within at least 1500m of the development site. This survey should take place over three consecutive breeding seasons to allow for annual variation in habitat suitability due to changes in crop cover on arable land. Based on these survey results the level of impact will require assessment and we consider that mitigation will be required to avoid, as far as possible, impacts on the stone-curlew population which could be of national significance. If impacts cannot be avoided than the application should not be consented.</p>
Appear at examination hearing session(s)?	No, I do not wish to participate in examination hearing session(s)

* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land at Tattersett Business Park
Consultation Point Number	Policy E7
Section of the Plan	Policy E7 Land at Tattersett Business Park
ID	LPS606
Response Date	02/03/2022 12:17:00
Name	Ms Kerry Harris
Organisation	Thornage Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	
* Yes	
* No	
Has the duty to cooperate been met?	
* Yes	
* No	
Do you consider the plan to be Sound?	No
* Yes	
* No	
Reason(s) not Sound	
* It is not positively prepared	
* It is not effective	
* It is not justified	
* It is not consistent with national policy	
Explanation	For the avoidance of confusion, there should only be one reference to an "E7" policy, noting that the same prefix is also applied to Land at Tattersett Park.
Modifications requested	As this is a site specific allocation, and, the only one for Tattersett it could be more sensibly identified as "TATT1" with commensurate changed references within Section 22 of the Plan.
Appear at examination hearing session(s)?	
* No, I do not wish to participate in examination hearing session(s)	
* Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land at Tattersett Business Park
Consultation Point Number	Policy E7
Section of the Plan	Policy E7 Land at Tattersett Business Park
ID	LPS746
Response Date	28/02/2022 08:14:00
Name	Mrs Debbie Mack
Organisation	Historic England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant?	
* Yes	
* No	
Has the duty to cooperate been met?	
* Yes	

* No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	<p>Whilst there are no designated heritage assets within the site boundary, there are two scheduled monuments (a bowl barrow and a saucer barrow) to the south west of the site.</p> <p>Any development has the potential to impact upon the setting of these heritage assets. However, dependent upon the precise nature and scale of development and with careful landscaping along the south western edge of the site some development should be possible on this site.</p> <p>At regulation 18 we advised that wording should be included in the policy to read Development should preserve and enhance the scheduled monuments to the south west of the site and their settings.</p> <p>The site is considered I the Heritage Impact Assessments. We welcome the preparation of a Heritage Impact Assessment in the Historic Environment Topic Paper. This provides robust evidence of the potential impact on the historic environment and suggests appropriate mitigation measures.</p> <p>The HIA sets out appropriate policy wording for inclusion in the Plan (see page 277).</p> <p>However, unfortunately this wording has not been included in the Plan. The policy needs amending to incorporate the wording from the HIA.</p> <p>We appreciate that criterion 1 of the policy does include some protection for the historic environment, but this falls short of the recommendations of the HIA.</p>
Modifications requested	<p>Either: Add criterion to read, Development should preserve and enhance the scheduled monuments to the south west of the site and their settings.</p> <p>Or: add wording from HIA:</p> <p>Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area. Development should include the following mitigation measures (as set out in further detail in the Historic Impact Assessment):</p> <ul style="list-style-type: none"> • Retain and enhance landscaping on all boundaries of the site. • Retain existing green spaces between units on the site • Retain footprint and scale of existing former airbase buildings
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Land at Tattersett Business Park
Consultation Point Number	Policy E7
Section of the Plan	Policy E7 Land at Tattersett Business Park
ID	LPS713
Response Date	25/02/2022 07:52:00
Name	Ms Laura Joyce
Organisation	Natural England
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	Yes

Has the duty to cooperate been met? * Yes * No	Yes
Do you consider the plan to be Sound? * Yes * No	Yes
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	Sound – Subject to appropriate assessment. Due to its proximity to SSSIs, any potential impacts of the development on designated site features should be fully considered and assessed. Priority habitats and species, such as Stone Curlew, should also be considered to assess the impact of the development proposals on local wildlife, in line with paragraphs 175 and 176 of the NPPF.
Modifications requested	
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

23 Housing Trajectory

Consultation Point Title	Housing Trajectory
Consultation Point Number	23
Section of the Plan	23 Housing Trajectory
ID	LPS456
Response Date	07/03/2022 18:16:29
Name	
Organisation	Richborough Estates
Agent Name	Mrs Raj Bains
Agent Organisation	Boyer Planning
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not positively prepared; It is not effective; It is not justified; It is not consistent with national policy
Explanation	<p>Please refer to full statement of representations (see LPS263) on behalf of our client.</p> <p>In response to Chapter 23 of the emerging plan, we consider the proposed level of housing delivery to be unrealistic and not sustainable. We also consider that the Council have overestimated the housing delivery as shown in the trajectory of the emerging Local Plan.</p> <p>Whilst we support development and growth being allocated to North Walsham, we strongly disagree that the majority of the proposed site allocations are likely to come forward in the first 5 years of the emerging plan, most importantly the proposed SUE (Policy NW62/A Land west of Walsham). There is no robust or sufficient evidence to suggest these are deliverable within the short term period of the plan. We therefore disagree that the plan is sound as the proposed housing trajectory is unjustified. The housing trajectory set out in the emerging Local Plan identifies an unrealistic projection of housing delivery over the first 7 years of the plan period and suggests an annual delivery of 502 to 812 dwellings per annum will be completed. This is shown below: 2023/24 – 505 dpa 2024/25 – 502 dpa 2025/26 – 593 dpa 2026/27 – 812 dpa 2027/28 – 664 dpa 2028/29 – 599 dpa 2029/30 – 638 dpa</p> <p>The emerging plan also notes that in the period of 2016-2021 around 2,422 new homes were built with an average delivery rate of 497 dwellings per annum. The annual requirement during this period was 480 dwellings per annum, however the actual completions over the last 5-year period are: 2016/17 – 442 dpa 2017/18 – 546 dpa 2018/19 – 534 dpa 2019/20 – 419 dpa 2020/21 – 481 dpa The Council's highest number of completions (546 dpa) were in 2017 and 2018. In 2019/20 there was an under delivery of 61 dwellings and in 2020/21 there were 481 completions, which just reached over the annual requirement, indicating a slower build out rate.</p> <p>Based on the above past delivery rates, it is not clear what evidence the Council has considered to indicate that a significantly higher rate of delivery is likely to be achievable in the District, in comparison to what has been achieved previously. There is no information within the evidence base to suggest the market would be able to sustain a significantly higher rate of delivery. A high delivery rate in two consecutive years (2017/18 and 2018/19) does not provide a robust or credible evidence base to suggest increasing levels of delivery are achievable during the plan period.</p> <p>We strongly consider that the Council have overestimated the level of supply likely to come forward as set out in the housing trajectory in</p>

	<p>the emerging plan. The majority of housing provision is expected be delivered from proposed site allocations (5,408 dwellings) to which no evidence is provided to support these projections.</p> <p>The housing trajectory includes the proposed delivery of the North Walsham SUE, which proposes 1800 new dwellings during and beyond the plan period. Noting that the proposed trajectory accepts 1037 dwellings will be completed post-plan period, 763 dwellings are expected to be completed from 2026/27 through to 2036.</p> <p>As we have previously expressed in the North Walsham Western Extension Initial Consultation in June 2021, given the site-specific constraints attributed to the proposed SUE (Policy NW62/A), we consider that this site is not deliverable at the rates set out within the housing trajectory over the proposed plan period.</p> <p>As per the Local Plan housing trajectory, noting that between the period of 2016 – 2021, 2,422 new dwellings were completed, there remains approximately 5,408 homes to be built through the proposed site allocations, 4,815 through commitments and 1,890 to be completed by windfall sites. In total, this accumulates to 12,113 dwellings over the plan period.</p> <p>Although there is a small difference of 17 dwellings, the total amount of housing proposed in Policy HOU1 is 12,096. This is not accurate and needs updating to reflect 12,113, which is the total anticipated housing provision. In light of the proposed housing trajectory and the two proposed sites allocations in North Walsham, we consider that between 2023 -2030 there will be a lack of new homes completed in the first 5-7 years of the plan period, with the vast majority of the 1,113 dwellings to be completed towards the latter end of the plan period. This will lead to more dwellings being completed post-plan period and less dwellings available to the meet the local housing need in the short and medium term.</p> <p>Using the Council's proposed housing trajectory, if this was to be pushed back where the proposed SUE started to deliver in 2030/31, a total of 550 dwellings would be completed in the plan period, leaving 1,250 dwellings to be completed post-plan period. These projections are shown below: 2030/31 – 30 dpa 2031/32 – 60 dpa 2032/33 – 100 dpa 2033/34 – 160 dpa 2034/35 – 100 dpa 2035/36 - 100 dpa Using the Lichfield report on average delivery rates at 102 dpa from the SUE, this would equate to a total of 612 completions between 2030 – 2036 and 1188 dwellings to be completed post- plan period.</p> <p>These lead times are not reflected in the emerging Local Plan and there is no evidence to suggest the projected housing delivery will come forward as per the housing trajectory. Therefore, in relation to the proposed SUE, we consider the housing trajectory to be overestimated in showing early delivery (from 2026) and unrealistically high delivery rates in comparison to other large sites. This is un-justified and leads to the plan being unsound.</p> <p>Based on the Council's proposed housing trajectory of the proposed SUE and our analysis of what is a more realistic rate of delivery commencing from 2030/31, a total of 550 dwellings would be completed during the final 6 years of the plan period, leaving a total of 1,250 dwellings to be completed post-plan period.</p> <p>This is a significant amount of housing to propose after the plan period, which should be delivered through the allocation of alternative small and medium sites during the early phase of the plan post adoption.</p>
<p>Modifications requested</p>	<p>We suggest that alternative / additional sites are allocated to the emerging Local Plan so that these can be delivered in the short and medium term of the plan period to ensure there is an adequate supply of housing in the District.</p> <p>Alternative / additional sites allocated to the plan will ensure there is a steady supply of housing over the plan period to address local housing needs.</p>
<p>Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>Justification for appearing at hearing</p>	<p>Our representations provide fundamental concerns about the proposed policies contained in the Local Plan. It is critical the Inspector hears our views on why we think the Plan is unsound and will fail to meet local housing needs of North Norfolk. Ultimately, our views could help assist the Council in ensuring there is an adequate supply of new housing across the District and throughout the short term, medium and long term period of the Local Plan.</p>

Attachment(s)	
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24 Monitoring Framework

Consultation Point Title	Monitoring Framework
Consultation Point Number	24
Section of the Plan	24 Monitoring Framework
ID	LPS800
Response Date	28/02/2022 14:38:00
Name	Mr Darl Sweetland
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	
Explanation	NOTE: Anglian Water understands that growth at North Walsham and Fakenham on strategic sites (23.0.3) of approximately 1500 homes may come forward after 2036. Anglian Water's investment plans will be adjusted to account for the actual levels of growth based upon pre application requests through to full planning permission being granted to ensure that water supply and wastewater capacity is available. Developers will need to demonstrate in applications that their plans provide for and fund the requisite network enhancements. SUPPORT: Anglian Water support the Policy CC4 and inclusion of the 110l/d/p target in the AMR indicators for climate resilient communities. The inclusion of the policy and monitoring of the target requires that developers provide for the monitoring of performance of new homes.
Modifications requested	Anglian Water requests that paragraph 24.0.4 sets out responsibility for the monitoring including provision through planning conditions and the potential steps which may be required of a developer whose developments when occupied fail to achieve 100% compliance with the water efficiency standard.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	

Local Plan Representations (Regulation 19)

Appendix 4: Growth Levels in Small Growth Villages

Consultation Point Title	Appendix 4: Growth Levels in Small Growth Villages
Consultation Point Number	
Section of the Plan	28.0.3
ID	LPS660
Response Date	03/03/2022 14:29:00
Name	Mr Lyndon Swift
Organisation	Weybourne Parish Council
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective; It is not justified
Explanation	<p>28.0.3 In order to establish the remaining level of growth which may be permitted before the 6% allowance is reached, calculations will take account of and exclude:</p> <p>iii. dwellings permitted that are brought forward through this Plan's Community-Led Development and Affordable Housing in the Countryside policies, (Rural Exceptions Policy), SS3 & HOU3, building conversions, and dwelling subdivisions.</p> <p>This clause does not meet the "Justified" or "Effective" test of soundness.</p> <p>It does not make sense to exclude community-led developments from the total number of houses. They will still be additional houses, and will meet local need, which is what the Plan is designed to achieve.</p>
Modifications requested	Community-led development should be included in the total number of houses. Community-led housing should be prioritised as it is likely to meet local needs, be more acceptable to local communities and fit in better with its location than commercial market housing where profit is inevitably the underlying motivation. The prioritisation of community-led housing would reassure the local community and improve relations between parish councils and NNDC and its planning department. It is also likely that community-led housing could be constructed more quickly as there would be fewer objections and less requirement for changes to plans, especially if NNDC's planning department cooperates with and supports community-led development from its early stages.
Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)
Justification for appearing at hearing	
Attachment(s)	
Consultation Point Title	Appendix 4: Growth Levels in Small Growth Villages
Consultation Point Number	
Section of the Plan	Appendix 4

ID	LPS286
Response Date	01/03/2022 11:06:43
Name	Mrs Clare Stagg
Organisation	
Agent Name	
Agent Organisation	
Do you consider the plan to be Legally Compliant? * Yes * No	
Has the duty to cooperate been met? * Yes * No	
Do you consider the plan to be Sound? * Yes * No	No
Reason(s) not Sound * It is not positively prepared * It is not effective * It is not justified * It is not consistent with national policy	It is not effective
Explanation	<p>As a resident to East Runton I am keen to ensure protection of all of the current village amenity.</p> <p>I have found this form quite complex to use and not user friendly so i am sorry if this is not in the correct places.</p> <p>However I am keen to ensure any policy protects all current village amenity - in terms of retail and A4 use and takeaway. We have the fishing boat, Sammy's (currently in for change of use), bernies, a fish and chip take away and the village shop and the butchers.</p> <p>We have lost in the last few years the Village tea rooms with associated shop, the Kit Bag and the Constantia. To preserve village amenity, tourism and employment i would like the plan to support new retail/A4 uses, and enshrine in policy of strong protections of what is existing.</p> <p>This supports local use and is environmentally friendly in so far as not requiring village residents to have to drive to other locations - and supports tourism - the village is on the coastal path and creates local employment.</p> <p>Housing where developed should focus on affordable housing for locals - not second homes. There is limited need and what need there is surely is for locals.</p> <p>as such i would like the policy to be strengthened so it protects existing amenity and allows for reasonable expansion and housing is for locals who will reside full time in the village</p>
Modifications requested	<p>As a resident to East Runton I am keen to ensure protection of all of the current village amenity.</p> <p>I have found this form quite complex to use and not user friendly so i am sorry if this is not in the correct places.</p> <p>However I am keen to ensure any policy protects all current village amenity - in terms of retail and A4 use and takeaway. We have the fishing boat, Sammy's (currently in for change of use), bernies, a fish and chip take away and the village shop and the butchers.</p> <p>We have lost in the last few years the Village tea rooms with associated shop, the Kit Bag and the Constantia. To preserve village amenity, tourism and employment i would like the plan to support new retail/A4 uses, and enshrine in policy of strong protections of what is existing.</p> <p>This supports local use and is environmentally friendly in so far as not requiring village residents to have to drive to other locations - and supports tourism - the village is on the coastal path and creates local employment.</p> <p>Housing where developed should focus on affordable housing for locals - not second homes. There is limited need and what need there is surely is for locals as such i would like the policy to be strengthened so it protects existing amenity and allows for reasonable expansion and housing is for locals who will reside full time in the village.</p>

Appear at examination hearing session(s)? * No, I do not wish to participate in examination hearing session(s) * Yes, I wish to participate in hearing session(s)	
Justification for appearing at hearing	
Attachment(s)	