

Important Information

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Purpose of the Consultation Statement

- 1.1 The purpose of this Consultation Statement is to set out how the Council has involved the local community, stakeholders and statutory bodies in the development of the North Norfolk District Local Plan. It sets out who was consulted, how consultation was undertaken and when, for each stage of consultation. The main points raised as a result of each consultation are summarised including how representations were taken into account as part of the preparation of the Local Plan.
- 1.2 The preparation of the Local Plan has included evidence gathering, thorough research and extensive consultation from the outset. This Consultation Statement evidences the positive and responsive stance the Council has taken towards consultation and community involvement and demonstrates how the Council has proactively engaged with all stakeholders to develop the Local Plan, in accordance with Local Plan Regulations, the National Planning Policy Framework (NPPF) and the Council's adopted Statement of Community Involvement (SCI).
- 1.3 This version is an early draft published to support the extended Regulation 18 stage consultation on the First Draft Local Plan and documents the process to date. It will be updated at each significant stage of Plan preparation.

Legislation and the Statement of Community Involvement

- 1.4 The Planning and Compulsory Purchase Act (2004) sets out the approach to plan preparation, including a strong emphasis on community engagement. Under Regulation 22(1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012⁽¹⁾, the Local Planning Authority has a requirement to prepare a statement to submit to the Secretary of State alongside the Local Plan which provides detail on:
 - i. which bodies and persons the local planning authority invited to make representations under regulation 18;
 - ii. how those bodies and persons were invited to make representations under regulation 18;
 - iii. a summary of the main issues raised by the representations made pursuant to regulation 18;
 - iv. how any representations made pursuant to regulation 18 have been taken into account;
 - v. if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and,
 - vi. if no representations were made in regulation 20, that no such representations were made.
- 1.5 **This interim Consultation Statement covers the above stages i - iv.**
- 1.6 Further, consultation has been carried out in accordance with the requirements of the National Planning Policy Framework (NPPF) paragraph 16(c) which requires plans 'be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees.'

The Council has undertaken early and continuous community and stakeholder engagement

1 <http://www.legislation.gov.uk/uksi/2012/767/regulation/22/made>

1 Introduction

in the Local Plan-making process to ensure that the needs and aspirations of the community and stakeholders have been fully taken into account in documents and decisions which help shape development in North Norfolk.

Local Planning Authorities are required to produce a Statement of Community Involvement (SCI) to set out how and at what stages the community can take part in and influence the plan-making process. These documents guide engagement activity. The Council's first SCI was adopted in April 2006 and the Regulation 18 Stage A consultation (discussed further on the following page) was carried out in accordance with its requirements. Subsequent consultations were undertaken in accordance with the approach and procedures set out in the updated SCI (adopted by the Council's Cabinet on 5 January 2016).

Relationship to other Submission Documents

1.7 This Consultation Statement is one of a number of documents to be submitted to the Secretary of State alongside the emerging Local Plan. Other relevant documents which should be read alongside this Statement include:

- the **Sustainability Appraisal (SA)** for the plan: The SA process has been carried out alongside the preparation of the emerging Local Plan policies and site allocations and has informed its content, including policy drafts and the consideration of options for site allocations, including reasonable alternatives;
- the **Duty to Cooperate: Statement of Compliance**: The Duty to Cooperate statement demonstrates that North Norfolk District Council (NNDC) has successfully complied with the Duty to Cooperate requirement during Local Plan production, as prescribed in the Localism Act (2011) and the National Planning Policy Framework (NPPF) (2012), including evidence of joint working and its effectiveness, outcomes arising from such working, and how joint working will continue into the future;
- The **Equality Impact Assessment (EquIA)**: This is a tool that helps public authorities make sure their policies, and the ways they carry out their functions, do what they are intended to do for everybody. Carrying out an EquIA involves systematically assessing the likely (or actual) effects of the above on people in respect of age, disability, gender, race, religion, belief and sexual orientation.
- the **Soundness Self-assessment**: This self-assessment sets out how the Council considers that the Local Plan addresses key soundness requirements including whether the Local Plan is positively prepared, justified, effective, and is in accordance with national policy. The soundness self-assessment also includes an assessment of the effectiveness of the Plan, including whether the consultation process has allowed for effective engagement of all interested parties, and;
- the **Legal Compliance Self-assessment**: This self-assessment sets out how the Council has met all legal requirements throughout the plan preparation process, including at the different stages of public consultation.

Structure of the Consultation Statement

1.8 Table 1 'Stages of Local Plan Consultation' shows the different stages and timings involved in Local Plan consultation and sets out how those stages have been considered within this Consultation Statement.

Introduction 1

Chapter Number	Consultation Stage	Sub-stage	Consultation Dates
3	Part 1: Regulation 18	Stage 1a: Subjects of the new Local Plan (also known as Regulation 18 Notification)	17 August - 9 October 2015
		Stage 1b: Housing and Economic Land Availability Assessment (HELAA) Methodology	21 March - 3 May 2016
		Stage 1c: Regulation 18: Town Strategies, Issues, Opportunities and Town Visions	10 May - 30 June 2016
		Stage 1d: Draft Sustainability Appraisal (SA) Scoping Report	10 October - 21 November 2016
		Stage 1e: Habitats Regulation Assessment (HRA) Scope	April 2017
		Stage 1f: Local Plan Workshop (Update & Viability)	29 August 2018
4	Part 2: Regulation 19	This section will be completed at the next stage of Local Plan preparation (Publication of a Local Plan).	

Table 1 Stages of Local Plan Consultation

2 Who was Consulted throughout Local Plan Preparation?

2 Who was Consulted throughout Local Plan Preparation?

2.1 In addition to the specific consultation methods discussed in the following chapters, there has been communication through:

- The Emerging **Local Plan webpages** (www.north-norfolk.gov.uk/localplan). All consultation documents and any consultation response forms were placed on the Council's website within the Planning Policy section;
- **Local Plan Newsletters** (see Appendix B: 'Local Plan Newsletter'. These are issued at least yearly to all consultees held on the Local Plan Consultation Database (approx 2000 consultees), as well as being available at the Council Offices, via the Council website and at various Council events;
- Links to any NNDC **News Releases** provided through the weekly Members' Bulletin;
- An **Agent's Planning Forum** (held at the Council Offices on a quarterly basis) and email updates (quarterly (first update winter 2016)).
- Officer attendance and a Local Plan display at the Council's annually held **Green Build** event (See Appendix O: 'General Consultation Evidence'), and;
- Site visits arranged at various stages throughout the preparation of the Local Plan:
 - Between December 2015 - February 2016, Members were invited to attend a Planning Policy and Built Heritage Working Party meeting to provide an update on the overall process of preparing a Local Plan and to explain how the call for sites process would be undertaken. Following the meeting, site visits were arranged to sites allocated in the current Local Plan.
 - Between September - November 2016, Members of the Working Party were joined by relevant Local Members, County Councillors and Town and Parish Councillors in **familiarisation bus tours**, with a purpose of acquainting themselves with a number of the sites put forward under the Council's Call for Sites consultation and the workshop events
 - Between March - May 2018, Members of the Working Party visited the site options; relevant District, County, Parish / Town Council Members were invited to attend the site visits. These visits focused on the proposed selected settlements as locations where the Plan would formally allocate land for development.

2.2 Additional information on the site visits can be found in Appendix A: 'Who was invited to be involved at each consultation stage?'

- On the 30th November 2017, Members of the Planning Policy and Built Heritage Working Party and Members of Development Committee were invited to an '**Understanding Coastal Erosion**' event, which included detailed discussion on the approach to the Local Plan and policy review. A list of the topics discussed can be found in Table 37 'Understanding Coastal Erosion '. Some Officers from Planning and the Housing Strategy team also attended and the Environment Agency were represented by one of the speakers.
- Attendance at **Town and Parish Council meetings** has been undertaken by Planning Policy Officers on request (2017 -2019), to provide an update on the process and answer any specific questions about particular policy areas. Officers have given a short presentation on progress and the timetable for consultation, emerging policy themes, evidence preparation and responded to any questions. Details of the Councils visited and topics covered can be found in Table 39 'Record of Officer Attendance at Parish & Town Council Meetings'.

Who was Consulted throughout Local Plan Preparation? 2

- **Parish and Town Council update events** were held on the 30th October and 1st November 2018 at NNDC offices in Cromer; approximately half of the 122 Parish & Town Councils in the District were in attendance over the two evenings. An email was sent to all Parish and Towns Councils after the events which provided access to the content of the meetings and advised them how to keep in touch and how to provide any feedback. See Figure 42 'Local Plan Update Follow-up Correspondence'.
- During March 2019 a notification **letter advising residents and businesses** of the upcoming First Draft Local Plan consultation, including dates, details of the purpose and key topics of the Plan, and where to find further information was issued with the annual Council Tax & Business Rates mailing, with distribution to approx. 54,000 residential and 7,000 commercial premises in North Norfolk. See Figure 43 'Parish & Town Council's Notice of Consultation'.
- Letter / email sent to all Parish & Town Council's to advise of the notification letter sent to residents and businesses. This communication also advised of consultation drop-in events and invited further requests for Officer attendance at parish and Town Council meetings. See Figure 44 'Parish & Town Council's Notice of Consultation & Drop-in Events Letter'.

2.3 In addition to the above communication, contact and consultation has been maintained with the following bodies:

NNDC Planning Policy & Built Heritage Working Party

2.4 The Planning Policy and Built Heritage Working Party is currently made up of 12 Members. Meetings are held on a monthly basis and the Party makes recommendations to Cabinet on matters of planning policy and built heritage. Meetings are open to the public and the agendas and minutes are available at www.north-norfolk.gov.uk/ppworkingparty. Decisions and Working Party papers are subsequently approved by the Council's Cabinet when required. In respect of the Local Plan, the purpose of the Working Party is to scrutinise and, where appropriate, to make recommendations on work relating to the Local Plan.

Duty to Cooperate Bodies

2.5 Throughout the development of the Local Plan, there has been regular and ongoing cooperation and discussion with adjoining local authorities (and other relevant stakeholders) to deliver cross-boundary strategic issues.

2.6 Cooperation with other Norfolk authorities is primarily orchestrated by two groups: the **Duty to Cooperate Members Forum** and the **Norfolk Strategic Planning Officers Group (NSPOG)**.

2.7 These groups comprise of the following members:

- **Duty to Cooperate Members Forum:** Member-led with a core membership of Members and Senior Officers from all Norfolk authorities. Meetings are held on a quarterly basis.
- **NSPOG:** Senior Officer-led with a core membership of Officers from all Norfolk planning authorities, the Greater Norwich Growth Board (GNGB), the Broads Authority, County Council representatives from Transport Planning, Economic Development, Strategic Planning and Minerals and Waste Policy Planning and the Environment Agency. Other bodies feeding into the process include Historic England, Natural England, Clinical Commissioning Groups (CCGs), Integrated Transport Authority, Highways Agency, The Marine Management Organisation, Local Enterprise Partnerships (LEPs), Local Nature Partnerships (LNPs), Strategic Services Coordinating Group, Wash East Coast Management Strategy, Norfolk Coast Partnership, Norfolk Biodiversity Partnership, Housing Boards and the A47 Alliance / Railway Policy Group. Meetings are generally held on a monthly basis when required. Topic-based Task and Finish groups carry out /

2 Who was Consulted throughout Local Plan Preparation?

commission work required to inform the drafting of a shared Strategic Planning Framework. Task and Finish group work is overseen by the Framework Officer Steering Group, which is made-up of senior officers representing Norfolk authorities.

- 2.8** Through the Duty to Cooperate process, joint commissioning of the evidence base has taken place and a joint Norfolk Strategic Framework (NSF) and Statement of Common Ground for Norfolk was endorsed by the Members Forum in December 2017, recommended for endorsement at the February 2018 NNDC Planning Policy and Built Heritage Working Party and endorsed by the Council in March 2018. In some cases, a shared methodology has been developed and has been subject to consultation. The detailed summary is contained within the Council's *Duty to Cooperate: Statement of Compliance*, however, when processes involved consultation, the summaries and how they influenced the outcome are reported within this document for completeness.

Further information is available at: www.north-norfolk.gov.uk/nspf.

Additional Partnership Working

- **Development Management Officers Group (DMO Group):** Senior officer group with a core membership of Officers including Norfolk County Council, South Norfolk Council, Broadland District Council, Norwich City Council, King's Lynn and West Norfolk Borough Council, Great Yarmouth Borough Council, the Broads Authority, Breckland District Council, the Lead Local Flood Authority and Norfolk County Highways. Meetings are held on a quarterly basis. The main aim of the group is to provide a strategic level update on issues affecting each District in attendance.
- **The Wash and North Norfolk Coast Marine Site Partnership Management Group:** Officer and Councillor represented group. The group fulfils statutory obligations with regard to European Marine Sites under the Habitats Directive and the Birds Directive (as incorporated into UK law in the Habitats Regulations. An Annual Action Plan is produced and NNDC have signed a continuous Memorandum of Agreement; reviewed on a three yearly review). In signing the MoA, NNDC have fully recognised the nature conservation importance of The Wash and North Norfolk Coast Marine Site Partnership management and the statutory obligations placed on the Council by the legislation. The management of the partnership is broken down into the Core Management Group (which NNDC does not sit on, as the Council is represented by another Council), the Full Management Board (meetings are held two or three times a year) and advisory groups which meet three times a year.

The 2018 Memorandum of Agreement has been agreed between The Eastern Inshore Fisheries and Conservation Authority, Lincolnshire County Council, Norfolk County Council, Boston Borough Council, East Lindsey District Council, Fenland District Council, South Holland District Council, North Norfolk District Council, King's Lynn and West Norfolk Borough Council, The Port of Boston, King's Lynn Conservancy Board, The Wells Harbour Commissioners, Water Management Alliance, Welland and Deepings Internal Drainage Board, Black Sluice Internal Drainage Board, Witham Fourth Internal Drainage Board, Defence Infrastructure Organisation, Natural England, Marine Management Organisation, Environment Agency and Lincolnshire Wildlife Trust.

- **Norfolk Coast AONB Partnership:** Officer and Councillor representation on the Core Management Group, with other key stakeholders being Kings Lynn and West Norfolk Borough Council, Great Yarmouth Borough Council, Natural England, Norfolk County Council, Broads Authority and Community representatives. Meetings are held approximately four times a year. The main aim of The Partnership is to deliver statutory duties required from Section 85 of the Countryside and Rights of Way Act 2000, which places a duty on relevant local authorities and public bodies, in exercising or performing

Who was Consulted throughout Local Plan Preparation? 2

any functions in relation to, or which affect, land in an AONB to have regard to the purpose of conserving and enhancing the natural beauty of an AONB. A 5 year Management Plan (currently under review for the period 2019-2023) is the framework for all the relevant bodies who have a role in the management of the AONB. A Partnership Forum meets twice yearly and is made up of representatives from all of the partners and five community representatives elected by parishes in the area.

- **Neighbourhood Planning Group:** Officer represented group with a membership of all of the Local Authorities in the County and Norfolk County Council. The main aim of the group is to discuss neighbourhood planning issues, group experience and the potential for taking collective views and approaches. Meetings are held four times a year.
- **Monitoring Officers Group:** Officer represented group with a core membership of Officers from all of the Local Authorities in the County and co-ordinated by Norfolk County Council. Meetings are held at least twice a year. The main aim of the group is to publish progress relating to building progress, housing monitoring, employment land movement & pupil forecasting (to plan for infrastructure needs) and as part of the Annual Monitoring of progress made towards the stated intentions in the Local Plans.

Local Plan Consultation Database

2.9 A Consultation Database (2005) was developed in support of the former Local Development Framework and contains the contact details of specific and general consultees, as well as individuals (including agents, developers, landowners and members of the public) who expressed an interest in getting involved in the plan-making process.

- **Specific consultation bodies:** including town and parish councils, adjoining local authorities, Historic England, Natural England and the Environment Agency.
- **General consultation bodies:** including bodies representing Gypsies, Travellers and Travelling Showpeople, older or younger people and tourism and interested individuals.

2.10 This database was used as a starting point for consulting stakeholders during preparation of the new Local Plan. Prior to carrying out the Regulation 18 Notification consultation, a major review of the database took place in order to update contact details (where known). Appendix A: 'Who was invited to be involved at each consultation stage?' gives additional information on those consulted throughout the Local Plan process; Table 22 'Number of General and Specific Consultees by Stage' indicates how many specific and general consultation bodies were consulted at each stage of Local Plan preparation and Table 23 'Number of Consultees by Category of Interest' splits those consulted into interest areas (economy, education, historic environment, landowners etc). Table 25 'List of Specific Bodies Consulted (Regulation 18)' and Table 26 'List of General Bodies Consulted (Regulation 18)' provides the full list of those consulted at some point during the Local Plan preparation (excluding individuals).

2.11 Those consulted fluctuated throughout the Local Plan process as consultees were added or removed from the Local Plan Consultation Database. In the main, interested parties were added to the database following promotional material or promotion from Officers encouraging involvement, whilst the removal of contacts from the database was as a result of a customer request, the Council receiving non-delivery notifications to an email or where letters sent were returned as 'unable to deliver' or 'addressee gone away'. In those instances, attempts were made to contact those organisations or individuals to ascertain correct contact information.

2.12 Everyone on the Database is consulted or notified of participation periods through methods including a newsletter, invitations to specific events, or invitation to make representations on a document.

2 Who was Consulted throughout Local Plan Preparation?

- 2.13** Additional information and a full copy of those consulted at each of the stages can be found in Appendix A: 'Who was invited to be involved at each consultation stage?' of this document.
- 2.14** Regulations require certain procedures at specific stages of Local Plan preparation. These are set-out on the following pages.

Who was Consulted throughout Local Plan Preparation? 2

3 Part 1: Regulation 18 (Preparation of a Local Plan)

3 Part 1: Regulation 18 (Preparation of a Local Plan)

3.1 In accordance with Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012;

(1) a Local Planning Authority must:

(a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and

(b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.

(2) The bodies or persons referred to in paragraph (1) are-

(a) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;

(b) such of the general consultation bodies as the local planning authority consider appropriate; and

(c) such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.

(3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1).

3.2 This section provides details of consultation at Stage 1 (Regulation 18 Stage) of the Local Plan process. Stage 1 incorporated a number of sub-stages, as detailed below:

Consultation Stage	Sub-stage	Dates
Part 1: Regulation 18	Stage 1a: Subjects of the new Local Plan (also known as Regulation 18 Notification)	17 August - 9 October 2015
	Stage 1b: Housing and Economic Land Availability Assessment (HELAA) Methodology	21 March - 3 May 2016
	Stage 1c: Town Strategies, Issues, Opportunities and Town Visions	10 May - 30 June 2016
	Stage 1d: Draft Sustainability Appraisal (SA) Scoping Report	10 October - 21 November 2016
	Stage 1e: Habitats Regulation Assessment (HRA) Scoping Report	April 2017
	Stage 1f: Local Plan Development Viability Workshop	29 August 2018

Table 2 Stages of Local Plan Consultation and Summary of Consultation Methods

Part 1: Regulation 18 (Preparation of a Local Plan) 3

3.1 Stage 1a: Subjects of the new Local Plan

How were Bodies and Persons consulted?

Consultation took place between 17 August and 9 October 2015. This period of consultation was authorised by the Council's [Cabinet on 6 July 2015](#).

3.3 In accordance with the Council's SCI, a range of consultation methods were used to try and ensure that a wide audience was engaged as part of the process, summary details of which are given in Table 3 'Stage 1a- How were Bodies and Persons Consulted?'. Further details and evidence of the consultation can be found in Appendix D: 'Stage 1a Consultation Evidence'.

What and When	How Consulted
Email/letter (August 2015)	<ul style="list-style-type: none"> A formal notification letter (including a copy of the Regulation 18 notification document and the summer 2015 edition of the Local Plan Newsletter) was sent via email or post to all those on the Local Plan Consultation Database. The purpose of the newsletter was to keep readers informed about the work that the Planning Policy Team were doing in relation to producing the new Local Plan for the District. In total, circa 1,500 consultation letters were sent out. In addition, a copy of the Summer 2015 newsletter was made available in each library and mobile library in the District.
Local Plan Launch Events (September 2015)	<ul style="list-style-type: none"> Local Plan Launch Events were organised (held at the NNDC Council Offices) with a purpose of raising awareness of the Local Plan process and to answer any attendee questions. All those on the Local Plan Consultation Database were invited to attend a launch event by way of an invite (letter/email for specific consultees and a newsletter for general consultees and members of the public). 38 stakeholders attended.
Local Agents' Forum (September 2015)	<ul style="list-style-type: none"> The Planning Department holds forums for local agents with the purpose to providing them with planning updates and to answer any questions. A presentation on the Local Plan launch and a question and answer session was included in the Forum. 13 local agents attended.
Public Exhibitions (Various)	<ul style="list-style-type: none"> As part of the Local Plan Launch events, exhibition boards were displayed at NNDC Council Offices in Cromer and Fakenham, with the purpose of informing visitors that the Council was beginning to prepare a new Local Plan and to encourage involvement in the process. In addition to displaying boards at the Council Offices, the Council utilised the opportunity to promote the launch of the Local Plan during an annual Council Green Build event, which is held to promote sustainable living. Historically, the Council's Planning department has had an exhibition area at the event. In 2015 (5 and 6 September), the Planning Department's exhibition included the Local Plan launch event boards; the section was staffed by Planning Policy Officers who were able to discuss Local Plan review queries. A demonstration computer was available to show members of the public how to use the Consultation Portal if necessary and copies of the first newsletter, the Regulation 18 Notification, Local Development Scheme (LDS), and SCI documents were available. These promotions increased awareness of the preparation of the Local Plan and current consultations.

Table 3 Stage 1a- How were Bodies and Persons Consulted?

3 Part 1: Regulation 18 (Preparation of a Local Plan)



Figure 1 Examples of public exhibitions

What and When	How Consulted
<p>News Release, Social Media and the NNDC Website (Various)</p>	<ul style="list-style-type: none"> • A week before the start of the Regulation 18 consultation period, a news release was issued. The release explained the purpose of the consultation and encouraged local people and organisations to get involved. In addition, those wishing to be kept up-to-date with the Local Plan process were encouraged to register to receive our regular Local Plan newsletters and information on consultations (either by email or post). The news release was sent to all the Archant titles (EDP, North Norfolk News All Editions), ITV Anglia, BBC East News Online, BBC Norfolk Radio, BBC Look East, Crab Tales, Cromer Times, North Norfolk Radio, East Norfolk Magazine, Fakenham Sun, Just Regional magazines, Holt Chronicle, KLFM, Lynn News, North Walsham Times, Heart. A number of newspapers included articles on the consultation, images of which are included in Appendix D: 'Stage 1a Consultation Evidence'. • Notification that work on a new Local Plan had commenced was shared through Twitter (17 August 2015) and Streetlife (25 August 2015). Streetlife is a local network and is generally used by people interested in what is happening in their local area). • The document and information on the consultation was also included on the NNDC website. • These promotions through a variety of mediums increased awareness of the preparation of the Local Plan and current consultations.
<p>Regulation 18: Notification Response Form</p>	<ul style="list-style-type: none"> • Regulation 18 Consultation response forms were made available via the Consultation Portal, the NNDC website and in paper format (copies were also made available at the Launch Event and Greenbuild and issued by request from the Planning Policy team). Response forms could be completed through the Portal, or completed electronically or in paper format and either emailed, posted or brought to the Council Offices. • The key purpose of the Regulation 18 Response form was to give interested parties the opportunity to contribute at an early stage of the Local Plan process, whether or not they decided to attend any of the consultation events. • By the end of the consultation period, 53 comments had been received.
<p>Internal Communication (Various)</p>	<ul style="list-style-type: none"> • In addition to engaging with local communities and organisations, involvement was encouraged within the Council. Methods used to notify Council staff of the Local Plan Launch included a post on the Council's internal website (14 August 2015), an internal email to NNDC Heads of Service (13 August 2015), and an article in the Council's monthly electronic newspaper (23 September 2015) (the newspaper has since been replaced with emailed Staff Bulletins). • Two meetings were arranged with Development Management Planning Officers with the purpose of discussing existing policies and giving Planning Officers an early opportunity to

Part 1: Regulation 18 (Preparation of a Local Plan) 3

What and When	How Consulted
	<p>identify any current policy interpretation concerns and gaps in existing policies (13 and 22 July 2015). Notes were taken at the meeting and the content agreed with attendees.</p> <ul style="list-style-type: none"> • These communications increased awareness of the preparation of the Local Plan and current consultations and enabled early engagement in developing new Development Management policies.

Table 4 Stage 1a- How were Bodies and Persons Consulted?

Summary of the main issues raised and how they were addressed

- 3.4** The consultation events included significant discussion on community issues, however, in general these focused on the main subjects already identified within the Regulation 18 Notification: spatial and town strategies, housing, the natural and historic environment, employment and economic development and community and transport.
- 3.5** Table 5 'Stage 1a- How Comments at Stage 1a were taken into Account' provides a brief summary of the key issues raised during consultation and how representations were taken into account. Further details and evidence of the consultations can be found in Appendix C: 'Stage 1a Consultation Summaries'.

Broad Topics	Brief Summary of Key Issues Raised (Subjects)	How Representations were taken into Account
Social	<p>Issues raised related to:</p> <ul style="list-style-type: none"> • Housing needs to meet the needs of all (including market, affordable, to rent, to buy, for local people, young people and first-time buyers); • the need for housing to be in the right locations; • the need to take into account the significant proportion of houses made up of second / holiday homes; • housing size, mix and quality needs to be considered; • the need to recognise the cross-cutting implications / impacts / benefits of housing on the environment, economy, local services and facilities; • the need to consider social cohesion, and; • the need to consider facilities for and welfare of the older population. 	<p>It was agreed that spatial and town strategies, housing and the community should be key focuses for the Local Plan to consider. Various relevant evidence was commissioned throughout the preparation process, including a Central Norfolk Strategic Housing Market Assessment (SHMA), a Caravans and Houseboats Needs Accommodation Assessment and an Older Persons Accommodation Needs Assessment and a Second Homes Study.</p> <p>The feedback provided also helped inform the Draft SA Scoping Report (including the SA Framework), which included specific chapters on housing and healthy and inclusive communities.</p>
Environmental	<p>Issues raised related to:</p> <ul style="list-style-type: none"> • the need to consider how to meet the challenge of climate change and its impacts; • the need to consider opportunities for renewable energy; • the need to consider the impact from coastal erosion and roll-back; • the need to consider water resource; • the need to protect and enhance the historic environment; • the need to protect and enhance the natural environment; 	<p>It was agreed that the national and historic environment should be key focuses for the Local Plan to consider. Various relevant evidence was commissioned throughout the preparation process, including a Visitor Impact Assessment on European Protected Species, a Green Infrastructure (GI) mapping project, a Landscape Character Assessment and a Landscape Sensitivity Assessment.</p> <p>The feedback provided also helped inform</p>

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Broad Topics	Brief Summary of Key Issues Raised (Subjects)	How Representations were taken into Account
	<ul style="list-style-type: none"> the need to enhance biodiversity, and; the need to balance the needs of the countryside against other areas such as industry, tourism and infrastructure. 	<p>the Draft SA Scoping Report (including the SA Framework), which included specific chapters on the natural and historic environment.</p>
Economic	<p>Issues raised related to:</p> <ul style="list-style-type: none"> the need to promote local employment in the right locations (including new and existing businesses and supporting the rural economy); the need to provide for economic development and growing local development; the need to recognise the importance of tourism; the need to balance increased tourism with the needs of residents; the need to recognise the cross-cutting relationship between the economy and housing; the need to consider the narrow economic base and range of businesses with limited scale and capacity; the need to consider shopping needs and the impact of changing shopping patterns on market towns; the need to consider educational provision; the need to encourage sustainable methods of transport, including footpath and cycle ways and links to open and green recreational areas; the need to consider infrastructure, and; the need to consider access to services and facilities (including broadband, mobile and indoor and outdoor facilities for sport and recreation, community and cultural). 	<p>It was agreed that spatial and town strategies, employment and economic development and transport should be key focuses for the Local Plan to consider. Various relevant evidence was commissioned throughout the preparation process, including Retail & Main Town Centre Uses Study, Business Growth & Investment Opportunities Study .</p> <p>The feedback provided also helped inform the Draft SA Scoping Report (including the SA Framework), which included specific chapters on the economic activity, education, infrastructure and accessibility.</p>

Table 5 Stage 1a- How Comments at Stage 1a were taken into Account

3.6 A number of responses received were either not directly related to this stage of Local Plan production (including, amongst others, comments on the Community Infrastructure Levy (CIL) and comments relating to specific sites).

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3.2 Stage 1b: Housing & Economic Land Availability Assessment Methodology

How were Bodies and Persons consulted?

Consultation took place between 21 March and 3 May 2016.

- 3.7** As part of the Duty to Cooperate, it was proposed to use a consistent methodology for producing Housing and Economic Land Availability Assessments (HELAAAs) across all of the planning authorities in Norfolk⁽²⁾. Authorities jointly consulted on the proposed approach, which was undertaken by NNDC.
- 3.8** In accordance with the Council's SCI, a range of consultation methods were used to try and ensure that a wide audience were engaged as part the process, summary details of which are given in Table 6 'Stage 1b- How were Bodies and Persons Consulted?' Further details and evidence of consultation can be found in Appendix F: 'Stage 1b Consultation Evidence'.

What and When	How Consulted
Email/letter (March 2016)	<ul style="list-style-type: none"> A consultation letter was sent via email or post to those consultees identified as being stakeholders by each of the Norfolk authorities (see Appendix A). The purpose of the letter was to invite views on the proposed methodology. In total 1,956 consultation letters were sent out.
NNDC Website	<ul style="list-style-type: none"> The document and Information on the consultation (including a set of FAQs), was included on the NNDC website. The website promotion increased awareness of the consultation.
HELAA Response Form	<ul style="list-style-type: none"> HELAA response form was made available on the NNDC website and in paper format by request. Forms could be completed electronically or in paper format and either emailed, posted or brought to the Council Offices. In total 25 responses were made, making approximately 110 individual points.

Table 6 Stage 1b- How were Bodies and Persons Consulted?

Summary of the main issues raised and how they were addressed

- 3.9** The consultation generated a number of responses and covered topics including the purpose of the HELAA methodology, accessibility to local services, coastal change and strategic gaps.
- 3.10** Table 7 'Stage 1b- How Comments at Stage 1b were taken into Account' provides a brief summary of the key issues raised during consultation and how representations were taken into account. Appendix E: 'Stage 1b Consultation Summaries' provides additional detail on the comments received and Officer comments on how these were taken into account (as agreed through the Duty to Cooperate process).

Brief Summary of Key Issues Raised	How Representations were taken into account
Clarity Clarifications around the purpose of the HELAA.	Contextual changes throughout added at relevant sections around the purpose of the HELAA, its role in the evidence base and what national guidance states.

² Breckland Council, Broadland District Council, Broads Authority, Great Yarmouth Borough Council, Borough Council of King's Lynn and West Norfolk, North Norfolk District Council, Norwich City Council and South Norfolk Council

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Brief Summary of Key Issues Raised	How Representations were taken into account
<p>Accessibility to local services Feedback suggested that access criteria should be increased in order to reflect available guidance including that of the by the Chartered Institute of Highways and Transportation (CIHT) and especially in terms of sites which were on the edge of settlements.</p>	<p>The access categories and supporting text were amended to reflect the consultation feedback and use of the CIHT recommended distances. Rather than a given that the methodology was being prepared under the Duty to Cooperate, responses to the comments needed to be reviewed and agreed across all of the Norfolk authorities. The finalised actions and methodology were signed of in a Housing Task and Finish Group meeting on 08 August 2016. Blanket 800m distance to services an 800m distance in town centres and 1,200m elsewhere with a 2,000m acceptable walking distance for schools and employment access is adopted.</p>
<p>Coastal Change The use of a 30m outside any Coastal Change Management Area or Coastal Flood Hazard Zone was criticised.</p>	<p>Criteria text was amended removing the assessment criteria of an additional 30m zone and clarifications added around how to assess sites adjacent to a Coastal Change Management Area or Coastal Flood Hazard Zone.</p>
<p>Strategic Gaps Feedback suggested that it was not appropriate (based on NPPF para 115-116), to discount sites purely because they are in a locally designated policy area such as strategic gap or landscape character area.</p>	<p>Clarification- the region has a number of nationally and locally specific landscapes. If a local planning authority cannot identify sufficient capacity to meet is own Objectively Assessed Need (OAN) through this methodology, then in the first instance consideration should be given to the need to revisit the assessment undertaking a finer grained assessment based on a review of the assumptions and relevant guidance. Additional text was inserted para 2.44 around the requirement to review appropriate assumptions if after the assessment sufficient capacity is not identified in order to meet OAN.</p>

Table 7 Stage 1b- How Comments at Stage 1b were taken into Account

- 3.11** In July 2017, an update was sent to all agents, developers and landowners to provide an update on the HELAA, provide information about the detailed site assessment stage, provide information of the opportunity to submit additional evidence to address constraints identified by the HELAA and provide an opportunity to contact the Planning Policy team to discuss site potential.
- 3.12** A further letter was sent in October 2017 providing a further update on upcoming Policy work, including deciding on the overall strategy for development (including the proposed settlement hierarchy), overall housing target, carrying out detailed site assessments and sustainability appraisals for those sites which align with the emerging strategy. A link was also provided to the Planning Policy and Built Heritage Working Party page, with a recommendation that it was checked for updates.
- 3.13** Copies of both correspondence can be found in Appendix F: 'Stage 1b Consultation Evidence'.
- 3.14** In December 2017 a site availability letter was sent to the sites which are in the emerging spatial strategy from the HELAA and for which we hold no availability details. The intention was to rule out sites for assessment which are not available / clarify site prior to assessment.

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3.3 Stage 1c: Town Strategies, Issues, Opportunities and Town Visions

How were Bodies and Persons consulted?

Consultation took place between 10 May - 14 November 2016.

- 3.15** Following the public consultation at Stage 1a, the Council expanded the scope of the consultation through a series of workshops with town and parish councils. Workshops were held with the town and parish councils which represented the principle and secondary settlements in order to provide a further opportunity to engage directly with consultees and identify their land use priorities that could be considered through the Local Plan. Town Councillors and relevant County Councillors and Local Members were all invited. Following the workshops, relevant Town and Parish councils and County Councillors were also invited to accompany District Councillors in familiarisation bus tours.
- 3.16** Summary details of the consultation are given in Table 8 'Stage 1c- How were Bodies and Persons Consulted?'. Further details and evidence of consultation can be found in Appendix G: 'Stage 1c Consultation Summaries'.

What and When	How Consulted
Town and Parish Workshops (May-June 2016)	<ul style="list-style-type: none"> Town and Parish Councils representing the District's Principle and Secondary settlements were invited to individual Local Plan workshops. The workshops were held at venues put forward by the various town/parish councils, details of which can be found in Appendix G: 'Stage 1c Consultation Summaries'. The purpose of the workshops was to raise awareness of the Local Plan review in the main settlements, discuss very early scenarios around the location and quantity of future development, to identify issues and opportunities and to enable general discussion. Circa 82 stakeholders attended an event (consisting primarily of Town/Parish councillors, although also including District Councillors, Town Mayor/Deputy and representatives from neighbouring authorities).
Familiarisation Bus Tours (September - November 2016)	<ul style="list-style-type: none"> Following the workshops, relevant Local Members, County Councillors and Town and Parish Councillors were invited to join Planning Policy & Built Heritage Working Party Members in familiarisation bus tours, with a purpose of familiarising themselves with a number of the sites that had been put forward under the Council's Call for Sites consultation and the workshop events (September - November 2016).

Table 8 Stage 1c- How were Bodies and Persons Consulted?

Summary of the main issues raised and how they were addressed

- 3.17** The consultation workshops generated significant discussion on community issues, where participants worked in groups to identify a wide range of strengths, opportunities, weaknesses and threats (SWOT analysis) for their respective towns/village and noted issues and opportunities on large scale maps. In general, discussions focused on housing provision, employment and retail, although further topics discussed included transport, the ageing population, second homes and the environment.
- 3.18** Table 9 'Stage 1c- How Comments at Stage 1c were taken into Account' provides a brief summary of the key issues raised during consultation and how representations were taken into account. Appendix G: 'Stage 1c Consultation Summaries' contains the summary SWOT

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analysis of each workshop. Full summaries of each event were produced and agreed with the relevant council. These documents are available in the document library on the NNDC Planning webpages.

Workshop	Brief Summary of Key Issues Raised
Cromer	Discussions on potential growth and possible locations and the need to consider impact on the countryside and environment, traffic and car parking. Issues raised included dwelling affordability, the need for family homes, the range of retail units, the robustness of the tourism sector, low wage economy, ageing population, sport and recreation opportunities and inadequate health care and mobile / Internet coverage. Additional threats identified included coastal erosion, loss of open space, lack of investment in green space / play equipment, limited opportunities for housing, loss of B&B's to housing, school capacity constraints.
Fakenham	Discussions on potential growth and the need to ensure that growth is plan-led and balanced in relation to jobs and homes delivery alongside infrastructure and town improvements. Issues raised included lack of available and suitable housing for all, lack of comparison retail choice, public transport, reliance of low paid employment and limited large employers, high shop rates and rents and environmental constraints. Additional threats identified included service/leisure provision, the need for balanced housing growth and a lack of ambition.
Holt	Discussions around potential future growth and possible locations. Issues raised included a lack of retail choice / mix to cater for all, lack of employment opportunities, lack of secondary school and capacity issues at primary school, high house prices, poor bus services, monopoly in terms of petrol provision poor distribution of children's play facilities and lack of adult / older children facilities, inadequate and poorly connected car parking. Additional threats identified include out of town retailing, retention of younger, economically active workforce, business decisions / investments being made by others who had no connection to the town, perceived threat of lack of employment opportunities, increased congestion, poor public realm, narrow / restrictive public footpaths and continued growth of second and holiday homes and impact on town centre trade.
Hoveton	<p>Discussions around potential future growth. Recognised in discussions that the settlements of Hoveton and Wroxham should be looked at as a whole and that villages should not be seen as potential locations to accommodate overspill from Norwich but as destinations in their own right and developed recognising links between employment growth and housing development. Issues raised include impact on services resulting from being a tourism destination, increased traffic and congestion, policies should seek to encourage a mix of shops and improvements to the retail offer, the importance of improvements around the railway line, reference to specific sites, concerns about the impacts of an ageing population and inadequate health care (GP and A&E).</p> <p>Wroxham Parish Council and associated District Councillors, the Broads Authority and Broadland DC were invited so as to obtain a collective and whole settlement view towards the identification of the issues and opportunities that the emerging Local Plans should consider. On the day only members of Hoveton Parish Council / District Cllr and officers of the Local Planning Authorities were able to make the meeting. The workshop content was altered with the commitment to undertake the workshop exercises at a later date.</p>
North Walsham	Discussions around potential future growth and possible locations. Issues raised included poor town centre retail offer, including small size of units and poor public realm, transport restrictions (low bridges), pressure on services such as health, lack of further education facilities, there only being one petrol station and flooding. Additional threats included capacity issues brought about through insufficient funding (health, road, education), lack of a joined-up approach, incremental growth not delivering benefit through S106 agreements, loss of further town centre retail particularly to residential and lack of development.
Sheringham	Discussions around potential future growth and possible locations. Issues raised included lack of employment for youngsters, lack of employment opportunities / investment / prevalence of low paid seasonal jobs, the reducing roll of the High Street and the Town's service centre function through the loss of retail services, the declining breadth of retail establishments, poor public realm (including signage). In addition, the increased proportion of over 65s,

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Workshop	Brief Summary of Key Issues Raised
	coupled with long waiting lists at Doctors / poor ambulance response times and lack of both suitable and reasonable prices market and affordable housing. Additional treats included growth without adequate provision and investment in services, potential impacts of larger retailers and further decline of the High Street through increase in charity shops and closure of retail services. Loss of employment land and potential impacts on the existing character and landscape values which contribute to the place setting, coalescence of Sheringham with Upper Sheringham holiday homes, ageing population, lack of potential development sites, pedestrianisation and development on top of Holway Road.
Stalham	Discussions around potential future growth and possible locations. Issues raised included lack of local employment for youngsters and lack of employment opportunities / investment, the reducing roll of the High Street and the town's service roll through the loss of bank services to North Walsham, poor off-peak public transport prominent undeveloped brownfield sites and the A149 separating the the town from the Broad's Area. Additional threats included the sale of affordable housing (in particular social rented properties), further decline of the high street and local businesses', not enough growth which could lead to stagnation whilst too much of the 'wrong sort' could erode community spirit and cohesion. Further, some concern around willingness to improve public realm, the opportunities for investment and the continued decline in retail provision on the High Street.
Wells-next-the-Sea	Discussions around potential future growth and possible locations. Issues included limited supply of appropriate housing (affordable), type and tenure, high proportion of second homes, parking congestion at peak times and lack of local petrol station, shortage of suitable employment land, seasonal employment opportunities including impact of low wages. Threats included erosion of the character of Wells-next-the-Sea, housing development serving the wider area and beyond, opportunities for local employment provision, excessive infill resulting in a threat to Local Green Infrastructure and wider development threat on the character of the Area of Outstanding Natural Beauty (AONB), ageing population, which could impact on the community and its services.
How Representations were taken into account	
The information gathered in the workshops forms part of the overall evidence base and was considered through the process of preparing the new plan; feedback and SWOT (Strengths, weaknesses, opportunities, threats) analysis directly fed into the visions for towns and the overall Local plan vision and objectives. In addition, a number of potential development sites were identified and fed into the HELAA Local Plan assessment process.	

Table 9 Stage 1c- How Comments at Stage 1c were taken into Account

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3.4 Stage 1d: Draft Sustainability Appraisal Scoping Report

How were Bodies and Persons consulted?

Consultation took place between 10 October and 21 November 2016.

3.19 In accordance with the Council's SCI, a range of consultation methods were used to try and ensure that a wide audience were engaged as part the process, summary details of which are given in Table 10 'Stage 1d- How were Bodies and Persons Consulted?'. Further details and evidence of consultation can be found in Appendix I: 'Stage 1d Consultation Evidence'.

What and When	How Consulted
Email / Letter (October 2016)	<ul style="list-style-type: none"> A consultation letter was sent via email to 32 identified consultees (including statutory consultees Environment Agency, Natural England and Historic England). Notification of the consultation was sent by email / post to all other stakeholders included on the Local Plan Consultation Database (see Table 23 'Number of Consultees by Category of Interest'). The purpose of the letter was to invite comments on the Draft Report. A copy of the document was made available at the Council Offices and in each library and mobile library in the District.
News Release, Social Media, NNDC Website (Various)	<ul style="list-style-type: none"> The document and information on the consultation, was included on the NNDC website. On the 18 October, a news release was issued. The press release explained the purpose of the consultation and explained that, whilst it was primarily a technical consultation with statutory bodies, other organisations and individuals may also submit representations. The news release was sent to all the Archant titles (EDP, North Norfolk News All Editions), ITV Anglia, BBC East News Online, BBC Norfolk Radio, BBC Look East, Crab Tales, Cromer Times, North Norfolk Radio, East Norfolk Magazine, Fakenham Sun, Just Regional magazines, Holt Chronicle, KLFM, Lynn News, North Walsham Times, Heart. Notification that work on a new Local Plan had commenced was shared through Twitter (17 August 2015) and Streetlife (25 August 2015). Streetlife is a local network and is generally used by people interested in what is happening in their local area). The document and information on the consultation was also included on the NNDC website. The website promotion increased awareness of the preparation of the Draft SA Scoping Report and the consultation.
Draft Sustainability Appraisal Scoping Report Consultation Questions	<ul style="list-style-type: none"> The Draft Sustainability Appraisal Scoping Report contained a chapter on 'The Purpose of this Report and how to use it', including a number of questions for consultees to consider. Comments were requested via email or post. In total 19 responses were made.

Table 10 Stage 1d- How were Bodies and Persons Consulted?

Summary of the main issues raised and how they were addressed

3.20 The consultation generated a number of responses and focused primarily on the SA Framework and, in particular, the Sustainability Appraisal Objectives and the Decision-Making Questions. Comments were also provided around specific areas of expertise, including the landscape, housing, water, crime, minerals and waste, flooding, climate change, biodiversity and the historic environment.

3.21 Table 11 'How Comments at Stage 1d were taken into Account' provides a brief summary of

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the key issues raised during consultation and how representations were taken into account. Appendix H: 'Stage 1d Consultation Summaries' provides additional detail on the comments received and Officer comments on how these were taken into account.

Brief Summary of Key Issues Raised	How Representations were taken into Account
Some additional District baseline information was suggested by consultees.	<p>Consideration was given to the additional information provided and, where relevant, incorporated into the document. Additional information included:</p> <ul style="list-style-type: none"> ● Information on the Broads and a hyperlink to the relevant Broads Authority Planning webpage; ● Information on minerals and waste; ● The addition of maps showing the landscape designations of the District (e.g. AONB, SSSI etc); ● Additional text around the risks from climate change and the potential for impacts on fresh water habitats and flood defences; ● Information in respect of climate change in relation to peak rainfall intensity and peak river flow; ● Information in respect of Surface Water Safeguard Zones and Groundwater Safeguard Zone. <p>In many instances information submitted provided additional useful background information to the issues already covered or was not included because it was considered too specific to be included in the SA Scoping Report (for example, relating to particular aspects that would be considered under specific policy assessment or relating to issues that would be considered under individual planning applications).</p>
Details on a limited number of additional policies, plans and programmes relevant to the Local Plan were submitted.	Where relevant, additional policies, plans and programmes were assessed and referred to within the SA. On the whole, these were related to the consultees particular specialism (primarily the Broads Authority, the Forestry Commission England, Anglian Water, Norfolk Police, Natural England and Historic England).
Some consultees suggested limited changes to the wording of the main sustainability issues identified or suggested additional issues.	<p>Where relevant, changes were made to the existing Sustainability Issues and Problems; on the whole, these changes were limited to strengthening the wording of the issues, such as removing the word 'consider'.</p> <p>A number of new issues and problems were identified, primarily, the inclusion of:</p> <ul style="list-style-type: none"> ● A need to ensure that housing provision is supported by appropriate infrastructure; ● A need to ensure that economic growth is supported by appropriate infrastructure; ● The need to ensure that non-minerals development does not needlessly prevent the future extraction of locally and nationally important minerals; ● How to address visitor pressure on designated sites, and; ● The need to consider reducing crime and the fear of crime.
Some consultees suggested clarification or amendments to a number of the SA Objectives.	<p>Further consideration was given to the Sustainability Objectives and changes were made to their wording and additional objectives added.</p> <p>Changes to the Environmental Objectives as a result of consultation responses included making specific reference to landscape settings as well as designated townscapes and seascapes and to maintaining and strengthening local distinctiveness and sense of place, heritage at risk, water quantity, optimising the use of Previously Developed Land, buildings and existing infrastructure. Changes to the Social Objectives included referring to access to facilities and</p>

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Brief Summary of Key Issues Raised	How Representations were taken into Account
	opportunities that promote engagement and a healthy lifestyle (including open space) and specific mention of inequality. The post-consultation interim SA Scoping Report contains a total of 16 Objectives.
A number of consultees suggested amendments to the Decision-Making Criteria for Policies and the Site-Specific Decision-Making Questions.	<p>Further consideration was given to the Criteria and Questions within the Framework, sometimes to provide additional clarity. Key changes made as a result of consultation responses and further Officer consideration include:</p> <ul style="list-style-type: none"> ● Reference to water quantity as well as quality under the Land, Water and Soil Resources Objective; ● Inclusion of Criteria on reducing energy consumption / improving energy efficiency under the Climate Change, Energy, Air Quality and Pollution Objective; ● Inclusion of supporting renewable energy generation under the Climate Change, Energy, Air Quality and Pollution Objective; ● Inclusion of Criteria and Question on the impact of noise, light and odour pollution under the pollution and contaminated land Objective; ● Amending the Criteria on protecting, maintaining and enhancing sites of natural importance to enable protected and unprotected species and non-designated sites to be considered under the Biodiversity, Fauna, Flora and Geodiversity Objective; ● Amending the Criteria on conserving and where possible enhancing the areas' landscape to include townscapes and seascapes and the special qualities of designated and non-designated areas and their settings under the Landscape, Townscape and Historic Environment Objective; ● The inclusion of a Question on how well the site is related to a defined settlement under the Healthy and Inclusive Communities Objective; ● Inclusion of Criteria and Question on access to leisure and cultural opportunities under the Healthy and Inclusive Communities Objective; ● Inclusion of Question on crime and the fear of crime under the Healthy and Inclusive Communities Objective; ● Amending one of the Questions under the Housing Objective to enable the range of housing types to be considered; ● Inclusion of Criteria and Question on investment, broadening the economy and job creation under the Economic Activity and Education Objective; ● Inclusion of Criteria and Question on goods distribution and the relation of the site to a defined settlement with good transport links and services within the Infrastructure and Accessibility Objective; ● Inclusion of specific Criteria and Question on reducing the need to travel by car under the Infrastructure and Accessibility Objective, and; ● Inclusion of Criteria and Question on key communications infrastructure within the Infrastructure and Accessibility Objective.
A number of consultees suggested amendments to the Framework response columns.	Changes were made to the majority of the SA Framework response columns. In particular, additional options have been included to allow finer grading between options (the inclusion of a ++ and a -- option) and an option for an uncertain or mixed effect decision to be reached has also been incorporated into the responses column of the Framework. In addition, clarity has been given to ensure that sites not proposing housing / employment etc. would not receive in a negative score.

Table 11 How Comments at Stage 1d were taken into Account

3.22 In addition to the above, a further response was received considered to be unrelated to the SA Scoping Report consultation and instead related to support a Call for Sites submission. It was agreed with the stakeholder that the response sent would be filed with the relevant Call for Sites submission.

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3.5 Stage 1e: Habitats Regulation Assessment Scoping Report

How were Bodies and Persons consulted?

3.23 Informal consultation took place with Natural England between April - May 2017 to inform the draft emerging Habitat Regulations Assessment Scoping Report.

Summary of the main issues raised and how they were addressed

3.24 The main advice from Natural England included:

- The identification of two further marine Special Protection Areas (SPA's):
 - Greater Wash potential SPA
 - Outer Thames Estuary SPA
- To ensure the results of the recent Visitor Survey assessment informed the Interim HRA and any strategic solution to address the impacts of recreational damage and disturbance to European sites from growth.

3.25 Appendix J: 'Stage 1e Consultation Summaries' provides additional detail on the comments received and Officer comments on how these were taken into account.

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3.6 Stage 1f: Local Plan Development Viability Workshop

How were Bodies and Persons consulted?

Consultation took place on 29 August 2018.

- 3.26** This event took the form of a 'Local Plan Workshop'; the purpose of which was to review the emerging findings of the draft Plan Wide Viability Study, being undertaken on behalf of the Council by Nationwide CIL Services (NCS). The study is a significant evidence based document which will be used to demonstrate the viability and deliverability of types of sites, the setting of affordable housing percentages and whether any additional margin exists to accommodate a Community Infrastructure Levy. The final study will accompany the publication and submission of the Local Plan.
- 3.27** In particular, the Council was seeking to agree the methodology and key assumptions in the study with representatives of the development industry. Individual invitations were sent to promoters, landowners and developers that have land interests in the emerging Local Plan and/or are known to be active in the District. A total of 76 invitations were sent and 27 people attended. In addition, two consultants from NCS attended and presented the information alongside 7 Council Officers.

Summary of the main issues raised and how they were addressed

- 3.28** The consultation generated a number of responses on the day and participants were also invited to submit any relevant and justified cost information by the end of September 2018. One response was subsequently received which highlighted recent clarifications within the National Planning Policy Framework (NPPF) and Planning Practice Guidance which it was suggested should be considered in future iterations of the report. In addition this response provided commentary on some of the assumptions in the study and useful factual information on build costs around the District.
- 3.29** Table 12 'How Comments at Stage 1f were taken into Account' provides a brief summary of the key issues raised during consultation and how representations were taken into account. Appendix L: 'Stage 1f Consultation Summaries' provides additional detail on the comments received and Officer comments on how these were taken into account.

Brief Summary of Key Issues Raised	How Representations were taken into Account
Some attendees raised concerns that the build costs review had underestimated current build costs associated with development.	Officers acknowledged that the initial build cost work that informed the draft study was undertaken in 2017 and therefore invited submission of any further, evidenced, build costs information. The study appraisals were subsequently re-run with updated assumptions in relation to build costs along with a review of other inputs.
There was discussion around remaining costs associated with the model such as sales, marketing, financing etc. along with profit levels for market housing (20% GDP) - these assumptions were not challenged although a lower profit margin of 17.5%, reflecting lower risk in the west of the District was discussed.	The revised study has used a developers profit of 17.5% to reflect the reduced risk of building in North Norfolk.
Questions were raised regarding the amount of contingency costs built into the model, specifically site specific infrastructure costs.	Section 106 contributions were reviewed in light of the additional inclusion of costs for externals and in line with the updated and refinement of policy requirements in the emerging Local Plan preferred site allocations.

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Brief Summary of Key Issues Raised	How Representations were taken into Account
Questions were raised regarding the affordable housing policy rates used.	The affordable housing mix has been reviewed to ensure it remains NPPF compliant and to reflect the more realistic requirements of differing geographical zones within the District.

Table 12 How Comments at Stage 1f were taken into Account

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3.7 Developing the Evidence Base and Site Selection

3.30 In addition to the consultation already outlined in this document, various meetings and consultations have been held with stakeholders during the process of developing the evidence base and site selection. A summary of these engagements and the main outcomes are identified as follows:

Identification of Water Capacity Constraints and Potential Impacts on Development

Main consultees	Key Dates	Details and outputs
Anglian Water, Environment Agency	Meetings held July 2016, August 2016, January 2017 and mapping outputs (forms part of the draft Infrastructure Position Statement) March 2017.	<p>In order to update the baseline and to inform the growth capacity and sustainable solutions at appropriate Water Recycling Centres and network capacity based on the existing adopted levels of Growth, NNDC worked through the Norfolk Strategic Framework to assess the capacity of existing infrastructure including water supply, wastewater and its treatment across Norfolk.</p> <p>The Council worked as part of a project group led by the Environment Agency (EA) in conjunction with Anglian Water to identify the level of development that could be accommodated at settlement level within the current permitted capacity of the water recycling centres (WRC). This work was based on the permitted capacity of the WRC, which is specified in the EA permit for each site along with the quality parameters that the discharge must meet. Further work included an assessment of potential future capacity given the known residential development detailed in the existing adopted Local Plans. Further direct engagement with Anglian Water was undertaken during 2017 and 2018 where Anglian Water provided more refined information on capacity constraints as part of the preparation of the Housing and Employment Land Assessment (HELAA) through the production of a RAG sheet. This was further refined to inform the Local Plan and in particular the site assessment process.</p> <p>In addition, the Council also undertook engagement on water efficiency measures and supply solutions with Anglian Water culminating in a presentation by Anglian Water to Officers from the Norfolk Strategic Framework (13 October 2017) around their high level strategy that plans for long term resilience of the public water supply. Norfolk is identified as an area of water stress and through the NSF, supported by Anglian Water, the Norfolk Authorities have agreed that when preparing Local Plans to seek the inclusion of the optional higher water efficiency standard (110 litres/per person/per day) for residential development (agreement 17, (NSF Dec, 2017)). Further ongoing co-operative approach is also supported to promote innovation in water efficiency through ongoing dialogue with water companies and site promoters/ developers.</p>

Table 13 Summary of engagement exercises - water capacity constraints and potential impacts on development

Housing & Economic Land Availability Assessment (HELAA)

Main consultees	Key Dates	Details and outputs
Norfolk County	Informal engagement with Anglian Water in February	In order to inform the emerging HELAA, NNDC undertook a number of evidence gathering exercises around site constraints.

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Main consultees	Key Dates	Details and outputs
Council (Highways), Anglian Water.	2017 and Norfolk County Council Highways in March 2017.	<p>Informal engagement with Anglian Water in February 2017 in respect of Water Recycling Centres and network constraints, resulted in a RAG Sheet being provided by Anglian Water to inform assessments. The RAG sheet included a range of information about the Water Recycling Centre Capacity, Sewerage network and Asset encroachment for all sites assessed in the HELAA.</p> <p>Informal engagement with Highways in March 2017 resulted in a spreadsheet being provided by Highways with comments on access, transport and roads suitability for all sites within selected settlements as set out in the current LDF Core Strategy.</p>

Table 14 Summary of engagement exercises - Housing & Economic Land Availability Assessment

Level 1 Strategic Flood Risk Assessment

Main consultees	Key Dates	Details and outputs
Environment Agency, Lead Local Flood Authority (Norfolk County Council), Anglian Water.	An inception meeting was held in April 2017 and further formal Stakeholder meetings consisting of Steering Group, Lead Local Flood Authority, Environment Agency, Anglia Water and representatives from the Internal Drainage Boards were held to review progress on 6th September 2017 and 16th January 2018.	<p>At the same time as working to establish the base line water utility position the Council explored the requirements of undertaking a Level One Strategic Flood Risk Assessment with the Environment Agency, Lead Local Flood Authority and Anglian Water. A draft brief of the study was discussed with officers from Norfolk and Suffolk Partnership and Strategic Overview Team, East Anglia Area (Norwich) on 14th October 2016 where input was primarily sought on the hydrology models available and Environment Agency requirements for new modelling and climate change allowances that should be included in the study. The emerging brief was subsequently widened to include adjacent planning authorities in Norfolk, (Kings Lynn & West Norfolk, Great Yarmouth and the Greater Norwich Authorities (South Norfolk, Broadland and Norwich City) and the Broads Authority. A steering group made up of each Local Authority, the Environment Agency, and Lead Local Flood Authority, was subsequently set up with the project led by NNDC. The study was produced in close collaboration with the Environment Agency with additional input from the commissioning LPAs, Internal Drainage Boards, Norfolk County Council as Lead Local Flood Authority and adjacent Local Planning Authorities. Throughout the study the steering Group worked closely with JBA (appointed consultants) and the Environment Agency to obtain appropriate model outputs, agree the scope and detail of the approach and interpretation of updated modelling outputs in an iterative nature.</p> <p>The final report was published in November 2017, with additional addendum report covering the Wells-next-the-Sea area in April 2018.</p>

Table 15 Summary of engagement exercises - SFRA

Amenity Green Space Review

Main consultees	Key Dates	Details and outputs
Town & Parish Councils	Review of existing Open Land & Education/Formal Recreation Designations as	In order to update the evidence base informing the Local Plan, the Council wrote to all Town and Parish Councils requesting nominations for Local Green Space (A copy of the correspondence sent can be

3 Part 1: Regulation 18 (Preparation of a Local Plan)

Main consultees	Key Dates	Details and outputs
	identified on the adopted Proposals Map undertaken during the Summer of 2017. Evidence base document; ' Amenity Green Space Topic Paper ' was published in June 2018 following discussion at the February 2018 Planning Policy and Built Heritage Working Party.	found in Appendix N: 'Developing the Evidence Base & Site Selection Consultation Evidence'). A total of 256 sites were considered for Amenity Green Space / Education or Formal Recreational Areas along with a further 226 suggestions for Local Green Space. The result is a comprehensive assessment of amenity land of one type or another in and around the District's existing selected settlements (as identified in Core Strategy Policy SS 1) and in those parishes where town and parish councils choose to put forward additional suggestions for review.

Table 16 Summary of engagement exercises - Amenity Green Space Review

Coastal Policy Development

Main consultees	Key Dates	Details and outputs
Norfolk & Suffolk Coastal Planning Authorities, Coastal Planning East.	Meetings held between Winter 2017 and Spring 2018.	The purpose of the meetings was to agree a joint approach to coastal planning along the North Norfolk coast from the Borough of King's Lynn & West Norfolk to Suffolk Coastal District, and to learn from best practice. A Coastal Zone Planning Statement of Common Ground was produced and Cabinet resolved that the Statement be signed on behalf of NNDC on 3 September 2018. (See Figure 36 'Coastal Zone Planning - Statement of Common Ground')

Table 17 Summary of engagement exercises - Coastal Policy Development

Local Plan Strategic Growth Areas & Site Assessment

Main consultees	Key Dates	Details and outputs
Norfolk County Council (Highways), Anglian Water, Norfolk Historical Environment Service.	A series of meetings were held and responses received from Highways with meetings held between November 2017 and May 2018. A RAG sheet was received from Anglian Water in March 2018 and information from Norfolk Historic Environment Service was received in June 2018.	During the development of the emerging spatial strategy, NNDC undertook a further exercise with infrastructure providers to inform site selection. In November 2017, informal discussions were held with Norfolk County Council (Highways) to discuss the general areas of growth being considered, the timeline and transport studies. Between February and May 2018, Norfolk Country Council (Highways) provided specific comments on site access and cumulative network issues through two meetings (February and April 2018) and a series of site specific responses for sites included in the emerging spatial strategy. Where Highway comments on sites provided through the HELAA were sufficient, no further comments were required. Engagement with Anglian Water provided a detailed and updated RAG sheet on the 28th March 2018 in relation to Water Recycling Centres and network capacity. Further, Norfolk Historical Environment Service provided information in June 2018 around the potential impacts of a site with

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Main consultees	Key Dates	Details and outputs
		regard archaeological assets (know sites and un- excavated sites) along with an assessment of heritage impacts from the full list of known assets.

Table 18 Summary of engagement exercises - Local Plan Strategic Growth Areas & Site Assessment

Health

Main consultees	Key Dates	Details and outputs
Local Planning Authorities, public health and health sector organisations in Norfolk.	The production of 'Planning in Health' in March 2017, recommended for approval when preparing Local Plans by the Planning Policy and Built Heritage Working Party in August 2017 and approved by Cabinet in September 2017. Meeting between NNDC and North Norfolk Clinical Commissioning Group in January 2018.	<p>An engagement protocol (Planning in Health) was produced in March 2017 between local planning authorities, public health and health sector organisations in Norfolk in recognition of a need for greater collaboration to plan for future growth and to promote health.</p> <p>Further, in order to inform the baseline, data was provided by North Norfolk Clinical Commissioning Group on GP surgeries with the size of the patient list and where there is capacity, dentists and pharmacies.</p> <p>Planning in Health was updated in November 2018 and included a healthy planning checklist to assist agents, developers and the LPA when preparing and assessing development proposals and directly informed the Local Plan approach to developer contributions.</p>

Table 19 Summary of engagement exercises - Health

Education

Main consultees	Key Dates	Details and outputs
Children's Services	Ongoing dialogue between children's services and NNDC in relation to existing and future school capacity and provision in North Norfolk. Specifically, clarity was sought as to the requirements and delivery mechanisms for additional school provision in Cromer, Holt, North Walsham.	<p>Ongoing dialogue between children's services and NNDC in relation to existing and future school capacity and provision in North Norfolk. Specifically, clarity was sought as to the requirements and delivery mechanisms for additional school provision in Cromer, Holt, North Walsham.</p> <p>The baseline school capacity can be found in the Infrastructure Position Statement and this has informed the approach taken in the Local Plan for specific site allocation requirements around school provision.</p> <p>In addition to the engagements detailed above, the Council also engages in other communications and partnership work that feeds into the Local Plan.</p>

Table 20 Summary of engagement exercises - Education

3 Part 1: Regulation 18 (Preparation of a Local Plan)

Open Space, Sport & Recreation Study & Sports Pitch Strategy

Main consultees	Key Dates	Details and outputs
<p>Various strategic consultees*, Town & Parish Councils, District and County Council members, & neighbouring Local Authorities.</p> <p>*List to be completed at the next stage as the work is currently on-going.</p>	<p>Inception meeting with consultants 13 December 2018. The open space element is expected to be completed in July 2019 and the Playing Pitch Strategy in August 2019.</p>	<p>Consultants 'Ethos Environmental Planning' in association with belap (Bennett Leisure & Planning) appointed to undertake an Open Space, Sport and Recreation Study and Sports Pitch Strategy to form part of the evidence base for the District's new Local Plan and also to inform an outdoor strategy based around sports pitch facilities.</p> <p>This evidence will inform open space requirements as part of new development proposals.</p>

Table 21 Summary of engagement exercises - Open Space, Sport & Recreation Study & Sports Pitch Strategy

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4 Part 2: Regulation 19 (Publication of a Local Plan)

4 Part 2: Regulation 19 (Publication of a Local Plan)

- 4.1** This section will be completed at the next stage of Local Plan preparation (Publication of a Local Plan).

Part 2: Regulation 19 (Publication of a Local Plan) 4

Appendices

Who was invited to be involved at each consultation stage? A

Appendix A: Who was invited to be involved at each consultation stage?

Regulation 18 Stage

The following table details the number of general and specific bodies who were consulted at each key stage of Local Plan preparation:

Consultee Type	Number Consulted at each Stage					
	Regulation 18, Stage 1a	Regulation 18, Stage 1b	Regulation 18, Stage 1c ⁽³⁾	Regulation 18, Stage 1d	Regulation 18, Stage 1e	Regulation 18, Stage 1f
	Subjects of the New Local Plan	HELAA Methodology	Town Strategies, Issues, Opportunities and Town Visions	Draft Sustainability Appraisal Scoping Report	Habitats Regulation Assessment Scoping Report	Local Plan Development Viability Workshop
Specific Consultees	273	776	4	290	1	0
General Consultees	1,255	1,180	78	1,398	0	68
Total	1,528	1,956	75	1,688	1	68

Table 22 Number of General and Specific Consultees by Stage

General & Specific Bodies Consulted by Category

The following table details the number of general and specific bodies, by category of interest, who were consulted at each key stage of Local Plan preparation. Duty to Cooperate stakeholders are included in this list:

Consultee Type	Number Consulted at each Stage					
	Regulation 18, Stage 1a	Regulation 18, Stage 1b	Regulation 18, Stage 1c ⁽³⁾	Regulation 18, Stage 1d	Regulation 18, Stage 1e	Regulation 18, Stage 1f
	Subjects of the New Local Plan	HELAA Methodology ⁽⁴⁾	Town Strategies, Issues, Opportunities and Town Visions	Draft Sustainability Appraisal Scoping Report	Habitats Regulation Assessment Scoping Report	Local Plan Development Viability Workshop
Coastal	15	See Table 24 'Number of Consultees by Category of Interest (Stage 1B)'	-	13	-	-
County Councillors	11		2	11	-	-
Disabled Persons Groups	15		-	15	-	-
District Councillors	48		12	48	-	-
Economy	25		-	21	-	-
Education	89		-	85	-	-

3 This number refers to the number who attended each event (for example, the number of Town / Parish *Councillors* who attended each event, rather than the number of Town / Parish Councils).

4 The HELAA methodology was a Norfolk-wide consultation carried out under the Duty-to-Cooperate with relevant stakeholders from all of the Norfolk authorities.

A Who was invited to be involved at each consultation stage?

Consultee Type	Number Consulted at each Stage					
	Regulation 18, Stage 1a	Regulation 18, Stage 1b	Regulation 18, Stage 1c ⁽³⁾	Regulation 18, Stage 1d	Regulation 18, Stage 1e	Regulation 18, Stage 1f
Electricity / Gas Companies	16		-	18	-	-
Electronic Communications	3		-	12	-	-
Environment	54		-	56	1	-
Food / Agriculture	16		-	17	-	-
Gypsies, Travellers and Travelling Showpeople Organisations	5		-	5	-	-
Health	31		-	30	-	-
Historic Environment	17		-	16	-	-
Interested Individuals (Agents)	217		-	265	-	30
Interested Individuals (Developers)	65		-	65	-	10
Interested Individuals (Landowners)	258		-	324	-	16
Interested Individuals (Public)	185		-	228	-	-
Local Authorities	20		2	23	-	-
Older / Younger People Organisations	20		-	20	-	-
Town / Parish Councils	158		63 ⁽³⁾	158	-	-
Racial / Ethnic / National	12		-	11	-	-
Religious Groups	40		-	40	-	-
Retail	13		-	13	-	-
Sports and Recreation	26		-	28	-	-
Tourism	40		-	38	-	-
Transport	27		-	27	-	-
Other	102		3	102	-	12

Table 23 Number of Consultees by Category of Interest

Where the Council received non-delivery notifications to an email or when letters sent were returned as 'unable to deliver' or 'addressee gone away', an attempt was made to contact those organisations or individuals to ascertain correct contact information.

Who was invited to be involved at each consultation stage? A

General & Specific Bodies Consulted by Category (Stage 1b)

The following table details the number of general and specific bodies, by category of interest, who were consulted at Stage 1b (Housing & Economic Land Availability Assessment Methodology).

Consultee Type	Number
Agents / Developers	691
Community Groups	96
Housing Associations	38
Individuals	130
Landowners	116
Local Enterprise Partnerships	1
Neighbouring Authorities to Norfolk	6
Specific Consultees (including Town and Parish Councils)	776
Other	150

Table 24 Number of Consultees by Category of Interest (Stage 1B)

List of Specific Bodies Consulted

The following table details the names of specific consultation bodies, by category of interest, who were consulted during the process of preparing the First Draft Local Plan (Regulation 18). Duty to Cooperate stakeholders are included in this list.

	Consultee Group/Type	Organisation Name
Specific Consultee	Agent	Defence Estates Ops North
Specific Consultee	Coastal	Marine Management Organisation
Specific Consultee	Electricity / Gas Company	British Pipeline Agency Ltd
Specific Consultee	Electricity / Gas Company	British Pipeline Agency Ltd (North Walsham Terminal)
Specific Consultee	Electricity / Gas Company	Cadent Gas (Gas Distribution)
Specific Consultee	Electricity / Gas Company	EDF Energy
Specific Consultee	Electricity / Gas Company	EDF Energy (East of England Office)
Specific Consultee	Electricity / Gas Company	Eon UK
Specific Consultee	Electricity / Gas Company	Interconnector UK Ltd (Bacton Terminal)
Specific Consultee	Electricity / Gas Company	N Power Renewables
Specific Consultee	Electricity / Gas Company	National Grid (Bacton Terminal)
Specific Consultee	Electricity / Gas Company	National Grid (Electricity & Gas Transmission)
Specific Consultee	Electricity / Gas Company	National Grid (Electricity Distribution)
Specific Consultee	Electricity / Gas Company	National Grid (Gas Distribution)

A Who was invited to be involved at each consultation stage?

	Consultee Group/Type	Organisation Name
Specific Consultee	Electricity / Gas Company	National Grid (Transmission Network - Plant Protection)
Specific Consultee	Electricity / Gas Company	Perenco UK Ltd (Bacton)
Specific Consultee	Electricity / Gas Company	Petrofac (Bacton)
Specific Consultee	Electricity / Gas Company	Shell UK Ltd (Bacton)
Specific Consultee	Electricity / Gas Company	Tullow Oil (Bacton)
Specific Consultee	Electricity / Gas Company	UK Power Networks
Specific Consultee	Electronic Communications	Arqiva
Specific Consultee	Electronic Communications	Atkins OSM (Vodafone Plant Protection)
Specific Consultee	Electronic Communications	BT Openreach
Specific Consultee	Electronic Communications	Cornerstone Telecommunications Infrastructure Ltd (CTIL)
Specific Consultee	Electronic Communications	EE
Specific Consultee	Electronic Communications	Mobile Broadband Network Ltd (MBNL)
Specific Consultee	Electronic Communications	Mobile UK
Specific Consultee	Electronic Communications	o2
Specific Consultee	Electronic Communications	Three
Specific Consultee	Electronic Communications	UK Broadband
Specific Consultee	Electronic Communications	Vodafone
Specific Consultee	Electronic Communications	Wireless Infrastructure Group
Specific Consultee	Environment	Anglian Water
Specific Consultee	Environment	Environment Agency
Specific Consultee	Environment	Natural England
Specific Consultee	Health	Health and Safety Executive (East of England)
Specific Consultee	Health	NHS Norfolk
Specific Consultee	Health	NHS North Norfolk Clinical Commissioning Group (CCG)
Specific Consultee	Historic Environment	Historic England
Specific Consultee	Historic Environment	Historic England (East of England)
Specific Consultee	Historic Environment	The Gardens Trust
Specific Consultee	Landowner	NHS Property Services
Specific Consultee	Local Authority	Borough Council of King's Lynn & West Norfolk
Specific Consultee	Local Authority	Breckland Council
Specific Consultee	Local Authority	Broadland District Council
Specific Consultee	Local Authority	Broads Authority
Specific Consultee	Local Authority	Great Yarmouth Borough Council
Specific Consultee	Local Authority	Norfolk Constabulary

Who was invited to be involved at each consultation stage? A

	Consultee Group/Type	Organisation Name
Specific Consultee	Local Authority	Norfolk Constabulary (East)
Specific Consultee	Local Authority	Norfolk Constabulary (HQ)
Specific Consultee	Local Authority	Norfolk Constabulary (Local Policing)
Specific Consultee	Local Authority	Norfolk County Council
Specific Consultee	Local Authority	Norfolk County Council (Education)
Specific Consultee	Local Authority	Norfolk County Council (Transport Strategy)
Specific Consultee	Local Authority	North Norfolk District Council
Specific Consultee	Local Authority	Norwich City Council
Specific Consultee	Local Authority	Office of the Police Crime and Commissioner for Norfolk
Specific Consultee	Local Authority	South Norfolk Council
Specific Consultee	Member of Parliament	Norman Lamb MP
Specific Consultee	Other	Defence Estate Organisation (Lands)
Specific Consultee	Other	Defence Estates
Specific Consultee	Other	Homes & Communities Agency (HCA)
Specific Consultee	Other	Norfolk Constabulary (North Walsham)
Specific Consultee	Other	The Planning Inspectorate (PINS)
Specific Consultee	Parish and Town Councils	Alby With Thwaite Parish Council
Specific Consultee	Parish and Town Councils	Aldborough & Thurgarton Parish Council
Specific Consultee	Parish and Town Councils	Antingham Parish Council
Specific Consultee	Parish and Town Councils	Ashmanhaugh Parish Council
Specific Consultee	Parish and Town Councils	Aylmerton Parish Council
Specific Consultee	Parish and Town Councils	Aylsham Town Council (Adjoining Town Council)
Specific Consultee	Parish and Town Councils	Baconsthorpe Parish Council
Specific Consultee	Parish and Town Councils	Bacton Parish Council
Specific Consultee	Parish and Town Councils	Barsham Parish Council
Specific Consultee	Parish and Town Councils	Barton Turf & Irstead Parish Council
Specific Consultee	Parish and Town Councils	Beeston Regis Parish Council
Specific Consultee	Parish and Town Councils	Belaugh Parish Meeting (Adjoining Parish Meeting)
Specific Consultee	Parish and Town Councils	Binham Parish Council
Specific Consultee	Parish and Town Councils	Blakeney Parish Council
Specific Consultee	Parish and Town Councils	Blickling Parish Council (Adjoining Parish Council)
Specific Consultee	Parish and Town Councils	Bodham Parish Council
Specific Consultee	Parish and Town Councils	Brampton Parish Council (Adjoining Parish Council)
Specific Consultee	Parish and Town Councils	Briningham Parish Council

A Who was invited to be involved at each consultation stage?

	Consultee Group/Type	Organisation Name
Specific Consultee	Parish and Town Councils	Brinton Parish Council
Specific Consultee	Parish and Town Councils	Briston Parish Council
Specific Consultee	Parish and Town Councils	Brumstead Parish Council
Specific Consultee	Parish and Town Councils	Burgh & Tuttington Parish Council (Adjoining Parish Council)
Specific Consultee	Parish and Town Councils	Burnham Overy Parish Council (Adjoining Parish Council)
Specific Consultee	Parish and Town Councils	Burnham Thorpe Parish Council (Adjoining Parish Council)
Specific Consultee	Parish and Town Councils	Buxton with Lamas Parish Council (Adjoining Parish Council)
Specific Consultee	Parish and Town Councils	Catfield Parish Council
Specific Consultee	Parish and Town Councils	Cley Parish Council
Specific Consultee	Parish and Town Councils	Colby & Banningham Parish Council
Specific Consultee	Parish and Town Councils	Colkirk Parish Council (Adjoining Parish Council)
Specific Consultee	Parish and Town Councils	Coltishall Parish Council (Adjoining Parish Council)
Specific Consultee	Parish and Town Councils	Corpusty & Saxthorpe Parish Council
Specific Consultee	Parish and Town Councils	Cromer Town Council
Specific Consultee	Parish and Town Councils	Dilham Parish Council
Specific Consultee	Parish and Town Councils	Dunton Parish Meeting
Specific Consultee	Parish and Town Councils	East & West Beckham Parish Council
Specific Consultee	Parish and Town Councils	East Rudham Parish Council (Adjoining Parish Council)
Specific Consultee	Parish and Town Councils	East Ruston Parish Council
Specific Consultee	Parish and Town Councils	Edgefield Parish Council
Specific Consultee	Parish and Town Councils	Erpingham Parish Council
Specific Consultee	Parish and Town Councils	Fakenham Town Council
Specific Consultee	Parish and Town Councils	Felbrigg Parish Council
Specific Consultee	Parish and Town Councils	Felmingham Parish Council
Specific Consultee	Parish and Town Councils	Field Dalling & Saxlingham Parish Council
Specific Consultee	Parish and Town Councils	Foulsham Parish Council (Adjoining Parish Council)
Specific Consultee	Parish and Town Councils	Fulmodeston Parish Council
Specific Consultee	Parish and Town Councils	Gateley Parish Meeting (Adjoining Parish Council)
Specific Consultee	Parish and Town Councils	Gimingham Parish Council
Specific Consultee	Parish and Town Councils	Great Snoring Parish Council
Specific Consultee	Parish and Town Councils	Gresham Parish Council
Specific Consultee	Parish and Town Councils	Guestwick Parish Meeting (Adjoining Parish Meeting)
Specific Consultee	Parish and Town Councils	Guist Parish Council (Adjoining Parish Council)
Specific Consultee	Parish and Town Councils	Gunthorpe Parish Council

Who was invited to be involved at each consultation stage? A

	Consultee Group/Type	Organisation Name
Specific Consultee	Parish and Town Councils	Hanworth Parish Council
Specific Consultee	Parish and Town Councils	Happisburgh Parish Council
Specific Consultee	Parish and Town Councils	Helhoughton Parish Council
Specific Consultee	Parish and Town Councils	Hempstead Parish Council
Specific Consultee	Parish and Town Councils	Hempton Parish Council
Specific Consultee	Parish and Town Councils	Heydon Parish Meeting (Adjoining Parish Meeting)
Specific Consultee	Parish and Town Councils	Hickling Parish Council
Specific Consultee	Parish and Town Councils	High Kelling Parish Council
Specific Consultee	Parish and Town Councils	Hindolveston Parish Council
Specific Consultee	Parish and Town Councils	Hindringham Parish Council
Specific Consultee	Parish and Town Councils	Holkham Parish Council
Specific Consultee	Parish and Town Councils	Holt Town Council
Specific Consultee	Parish and Town Councils	Honing Parish Council
Specific Consultee	Parish and Town Councils	Horning Parish Council
Specific Consultee	Parish and Town Councils	Horsey Parish Council
Specific Consultee	Parish and Town Councils	Hoveton Parish Council
Specific Consultee	Parish and Town Councils	Ingham Parish Council
Specific Consultee	Parish and Town Councils	Ingworth Parish Council
Specific Consultee	Parish and Town Councils	Itteringham Parish Council
Specific Consultee	Parish and Town Councils	Kelling Parish Council
Specific Consultee	Parish and Town Councils	Kettlestone Parish Council
Specific Consultee	Parish and Town Councils	Knapton Parish Council
Specific Consultee	Parish and Town Councils	Langham Parish Council
Specific Consultee	Parish and Town Councils	Lessingham with Eccles Parish Council
Specific Consultee	Parish and Town Councils	Letheringsett With Glandford Parish Council
Specific Consultee	Parish and Town Councils	Little Barningham Parish Council
Specific Consultee	Parish and Town Councils	Little Snoring Parish Council
Specific Consultee	Parish and Town Councils	Ludham Parish Council
Specific Consultee	Parish and Town Councils	Martham Parish Council (Adjoining Parish Council)
Specific Consultee	Parish and Town Councils	Matlaske Parish Council
Specific Consultee	Parish and Town Councils	Melton Constable Parish Council
Specific Consultee	Parish and Town Councils	Morston Parish Council
Specific Consultee	Parish and Town Councils	Mundesley Parish Council
Specific Consultee	Parish and Town Councils	Neatishead Parish Council

A Who was invited to be involved at each consultation stage?

	Consultee Group/Type	Organisation Name
Specific Consultee	Parish and Town Councils	Norfolk Association of Local Councils
Specific Consultee	Parish and Town Councils	North Creake Parish Council (Adjoining Parish Council)
Specific Consultee	Parish and Town Councils	North Elmham Parish Council (Adjoining Parish Council)
Specific Consultee	Parish and Town Councils	North Walsham Town Council
Specific Consultee	Parish and Town Councils	Northrepps Parish Council
Specific Consultee	Parish and Town Councils	Oulton Parish Council (Adjoining Parish Council)
Specific Consultee	Parish and Town Councils	Overstrand Parish Council
Specific Consultee	Parish and Town Councils	Paston Parish Council
Specific Consultee	Parish and Town Councils	Plumstead Parish Council
Specific Consultee	Parish and Town Councils	Potter Heigham Parish Council
Specific Consultee	Parish and Town Councils	Pudding Norton Parish Council
Specific Consultee	Parish and Town Councils	Raynham Parish Council
Specific Consultee	Parish and Town Councils	Repps with Bastwick Parish Council (Adjoining Parish Council)
Specific Consultee	Parish and Town Councils	Roughton Parish Council
Specific Consultee	Parish and Town Councils	Runton Parish Council
Specific Consultee	Parish and Town Councils	Ryburgh Parish Council
Specific Consultee	Parish and Town Councils	Salhouse Parish Council (Adjoining Parish Council)
Specific Consultee	Parish and Town Councils	Salthouse Parish Council
Specific Consultee	Parish and Town Councils	Scottow Parish Council
Specific Consultee	Parish and Town Councils	Sculthorpe Parish Council
Specific Consultee	Parish and Town Councils	Sea Palling & Waxham Parish Council
Specific Consultee	Parish and Town Councils	Sheringham Town Council
Specific Consultee	Parish and Town Councils	Sidestrand Parish Council
Specific Consultee	Parish and Town Councils	Skeyton Parish Council
Specific Consultee	Parish and Town Councils	Sloley Parish Council
Specific Consultee	Parish and Town Councils	Smallburgh Parish Council
Specific Consultee	Parish and Town Councils	Somerton Parish Council (Adjoining Parish Council)
Specific Consultee	Parish and Town Councils	South Creake Parish Council (Adjoining Parish Council)
Specific Consultee	Parish and Town Councils	South Walsham Parish Council (Adjoining Parish Council)
Specific Consultee	Parish and Town Councils	Southrepps Parish Council
Specific Consultee	Parish and Town Councils	Stalham Town Council
Specific Consultee	Parish and Town Councils	Stibbard Parish Council
Specific Consultee	Parish and Town Councils	Stiffkey Parish Council
Specific Consultee	Parish and Town Councils	Stody Parish Council

Who was invited to be involved at each consultation stage? A

	Consultee Group/Type	Organisation Name
Specific Consultee	Parish and Town Councils	Suffield Parish Council
Specific Consultee	Parish and Town Councils	Sustead Parish Council
Specific Consultee	Parish and Town Councils	Sutton Parish Council
Specific Consultee	Parish and Town Councils	Swafield Parish Council
Specific Consultee	Parish and Town Councils	Swanton Abbott Parish Council
Specific Consultee	Parish and Town Councils	Swanton Novers Parish Council
Specific Consultee	Parish and Town Councils	Syderstone Parish Council (Adjoining Parish Council)
Specific Consultee	Parish and Town Councils	Tattersett Parish Council
Specific Consultee	Parish and Town Councils	Thornage Parish Council
Specific Consultee	Parish and Town Councils	Thorpe Market Parish Council
Specific Consultee	Parish and Town Councils	Thurne Parish Council (Adjoining Parish Council)
Specific Consultee	Parish and Town Councils	Thurning Parish Meeting
Specific Consultee	Parish and Town Councils	Thursford Parish Council
Specific Consultee	Parish and Town Councils	Tittleshall Parish Council (Adjoining Parish Council)
Specific Consultee	Parish and Town Councils	Trimingham Parish Council
Specific Consultee	Parish and Town Councils	Trunch Parish Council
Specific Consultee	Parish and Town Councils	Tunstead Parish Council
Specific Consultee	Parish and Town Councils	Upper Sheringham Parish Council
Specific Consultee	Parish and Town Councils	Upton with Fishley Parish Council (Adjoining Parish Council)
Specific Consultee	Parish and Town Councils	Walcott Parish Council
Specific Consultee	Parish and Town Councils	Walsingham Parish Council
Specific Consultee	Parish and Town Councils	Warham Parish Council
Specific Consultee	Parish and Town Councils	Weasenham St Peter Parish Council (Adjoining Parish Council)
Specific Consultee	Parish and Town Councils	Wellingham Parish Council (Adjoining Parish Council)
Specific Consultee	Parish and Town Councils	Wells Town Council
Specific Consultee	Parish and Town Councils	West Rudham Parish Council (Adjoining Parish Council)
Specific Consultee	Parish and Town Councils	Westwick Parish Meeting
Specific Consultee	Parish and Town Councils	Weybourne Parish Council
Specific Consultee	Parish and Town Councils	Wickmere Parish Council
Specific Consultee	Parish and Town Councils	Wighton Parish Council
Specific Consultee	Parish and Town Councils	Winterton-on-Sea Parish Council (Adjoining Parish Council)
Specific Consultee	Parish and Town Councils	Witton Parish Council
Specific Consultee	Parish and Town Councils	Wiveton Parish Council
Specific Consultee	Parish and Town Councils	Wood Dalling Parish Council (Adjoining Parish Council)

A Who was invited to be involved at each consultation stage?

	Consultee Group/Type	Organisation Name
Specific Consultee	Parish and Town Councils	Wood Norton Parish Council
Specific Consultee	Parish and Town Councils	Woodbastwick Parish Council (Adjoining Parish Council)
Specific Consultee	Parish and Town Councils	Worstead Parish Council
Specific Consultee	Parish and Town Councils	Wroxham Parish Council (Adjoining Parish Council)
Specific Consultee	Sport & Recreation	Sport England
Specific Consultee	Transport	Civil Aviation Authority (CAA)
Specific Consultee	Transport	Network Rail (Infrastructure) Ltd
Specific Consultee	Transport	Secretary of State for Transport
Specific Consultee	Transport	The Office of Rail Regulation

Table 25 List of Specific Bodies Consulted (Regulation 18)

In addition to the above, serving North Norfolk District Council Members (48) and Norfolk County Council members (11) have also also consulted.

List of General Bodies Consulted

The following table details the names of general consultation bodies, by category of interest, who were consulted during the process of preparing the First Draft Local Plan (Regulation 18). Duty to Cooperate stakeholders are included in this list.

	Consultee Group / Type	Organisation Name
General Consultee	Agent	Abzag
General Consultee	Agent	ADAS Rural Property Services
General Consultee	Agent	Adrian E Smith FRICS
General Consultee	Agent	Adrian Parker Planning
General Consultee	Agent	AECOM
General Consultee	Agent	Alan Irvine Planning & Property Consultant
General Consultee	Agent	Aldreds Chartered Surveyors
General Consultee	Agent	Allan Moss Associates Limited
General Consultee	Agent	Alsop Verrill - Town Planning & Development Consultancy
General Consultee	Agent	Ancer Spa Planning Consultants
General Consultee	Agent	Arcus Consultancy Services
General Consultee	Agent	Armstrong Rigg Planning
General Consultee	Agent	Arnolds Chartered Surveyors
General Consultee	Agent	Arnolds Keys Estate Agents (Aylsham Office)
General Consultee	Agent	Arnolds Keys Estate Agents (Cromer Office)
General Consultee	Agent	Atkins Global

Who was invited to be involved at each consultation stage? A

	Consultee Group / Type	Organisation Name
General Consultee	Agent	Attis
General Consultee	Agent	AWG Land Holdings Limited
General Consultee	Agent	Barnes Harley Witcomb
General Consultee	Agent	Barton Willmore (Cambridge)
General Consultee	Agent	Barton Willmore (London)
General Consultee	Agent	Bastin Steward Ltd
General Consultee	Agent	BB Architecture + Planning
General Consultee	Agent	BBA Architects
General Consultee	Agent	BBAP Architecture & Planning
General Consultee	Agent	Bernard Matthews Ltd
General Consultee	Agent	Biddenham & Clearbrook Architectural Design
General Consultee	Agent	Bidwells
General Consultee	Agent	Bidwells LLP
General Consultee	Agent	Bilfinger GVA
General Consultee	Agent	Biscoe Associates
General Consultee	Agent	Blue Sky Planning
General Consultee	Agent	Bond Architects
General Consultee	Agent	Boyer Planning
General Consultee	Agent	Brian Walsgrove Architectural Services
General Consultee	Agent	Brimble, Lea & Partners
General Consultee	Agent	Brown & Co (Norwich)
General Consultee	Agent	Brown & Co LLP
General Consultee	Agent	Budget Plans Architectural Consultants
General Consultee	Agent	Butcher Andrews Solicitors
General Consultee	Agent	Buttery & Watson Development Consultants
General Consultee	Agent	C&M Architects Ltd
General Consultee	Agent	Calvert Kemp Project Management
General Consultee	Agent	Carter Concrete Limited
General Consultee	Agent	Carter Jonas LLP
General Consultee	Agent	Cator & Co
General Consultee	Agent	CB Richard Ellis
General Consultee	Agent	CBRE UK
General Consultee	Agent	CGMS Consulting
General Consultee	Agent	Chaplin Farrant Ltd

A Who was invited to be involved at each consultation stage?

	Consultee Group / Type	Organisation Name
General Consultee	Agent	Chapman Warren (RPS) Town Planning and Development Consultants
General Consultee	Agent	Cheffins
General Consultee	Agent	Chris Yardley Landscape Survey & Design
General Consultee	Agent	Claxon Hall Architectural Ltd
General Consultee	Agent	Cockertons Chartered Surveyors
General Consultee	Agent	Colliers CRE
General Consultee	Agent	Concept Town Planning
General Consultee	Agent	Cornerstone Barristers
General Consultee	Agent	Cornerstone Planning
General Consultee	Agent	Corylus
General Consultee	Agent	Creeting & Coast Developments
General Consultee	Agent	Crownrock Holdings
General Consultee	Agent	Cruso & Wilkin Chartered Surveyors
General Consultee	Agent	CSJ Brooke Smith
General Consultee	Agent	Dalcour Maclaren
General Consultee	Agent	David Evans Chartered Planning Consultancy
General Consultee	Agent	David Futter Associates Ltd
General Consultee	Agent	David Gipson Architects
General Consultee	Agent	David Hurdle Transport Planning Consultancy
General Consultee	Agent	David Walker Surveyors
General Consultee	Agent	David Will Chartered Surveyor and Planning Advisor
General Consultee	Agent	Davis Langdon
General Consultee	Agent	Define
General Consultee	Agent	Deloitte LLP
General Consultee	Agent	Deloitte Real Estate
General Consultee	Agent	Demesne Partnership
General Consultee	Agent	Design Services
General Consultee	Agent	Dialogue by Design
General Consultee	Agent	DLP Consultants (Bedford)
General Consultee	Agent	DPDS Consulting Group
General Consultee	Agent	Drivers Jonas Deloitte
General Consultee	Agent	DTZ
General Consultee	Agent	DWA Planning
General Consultee	Agent	Edwin Watson Partnership (North Walsham)

Who was invited to be involved at each consultation stage? A

	Consultee Group / Type	Organisation Name
General Consultee	Agent	Edwin Watson Partnership (Norwich)
General Consultee	Agent	EJW Planning Ltd
General Consultee	Agent	Engena
General Consultee	Agent	Entec UK Ltd
General Consultee	Agent	Eversheds LLP
General Consultee	Agent	Fairhurst Engineering
General Consultee	Agent	Fakenham Designs
General Consultee	Agent	Fisher Wilson Property Consultants
General Consultee	Agent	Framptons
General Consultee	Agent	Francis Keane Architects
General Consultee	Agent	Fusion 13
General Consultee	Agent	Fusion Online Ltd
General Consultee	Agent	G R Planning Consultancy Ltd
General Consultee	Agent	Gerald Eve
General Consultee	Agent	Gladman Developments Ltd
General Consultee	Agent	GLTP Development Consultancy
General Consultee	Agent	Greg Garland Chartered Town Planner
General Consultee	Agent	Grimshaw Architects
General Consultee	Agent	Ground Designs
General Consultee	Agent	Grounds & Co Estate Agents
General Consultee	Agent	GVA Grimley
General Consultee	Agent	Hanworth Properties Ltd
General Consultee	Agent	Harris Lamb Property Consultancy
General Consultee	Agent	Hayes & Storr
General Consultee	Agent	Holistic Ideas Ltd
General Consultee	Agent	Holland & Holland Design Consultants
General Consultee	Agent	Howard Page Estate Agents
General Consultee	Agent	Howes Designs Ltd
General Consultee	Agent	Hugh Ivins Planning Consultant
General Consultee	Agent	Ian H Bix Associates
General Consultee	Agent	Ian J M Cable Architectural Design
General Consultee	Agent	Iceni Projects
General Consultee	Agent	ICIS Consulting
General Consultee	Agent	Indigo Planning

A Who was invited to be involved at each consultation stage?

	Consultee Group / Type	Organisation Name
General Consultee	Agent	Indigo Planning Limited
General Consultee	Agent	Ingleton Wood Property Consultants
General Consultee	Agent	Irelands Arnolds Keys
General Consultee	Agent	Irelands Chartered Surveyors
General Consultee	Agent	James Henman Architects
General Consultee	Agent	Januarys Consultant Surveyors
General Consultee	Agent	Jeremy Stacey Architects
General Consultee	Agent	John Ellis Architectural Design
General Consultee	Agent	John Evennett Associates
General Consultee	Agent	John Long Planning
General Consultee	Agent	John Marsh Chartered Surveyors & Estate Agents
General Consultee	Agent	John Martin & Associates
General Consultee	Agent	John Pardon MCIAT Chartered Architectural Technologist
General Consultee	Agent	JWM Designs
General Consultee	Agent	Keith Reay Architects
General Consultee	Agent	Ken Woodrow FRICS
General Consultee	Agent	La Ronde Wright Ltd
General Consultee	Agent	Lambert Smith Hampton
General Consultee	Agent	Land And New Homes Countrywide
General Consultee	Agent	Land Use Futures
General Consultee	Agent	Landmark Planning
General Consultee	Agent	Lanpro Services
General Consultee	Agent	Laurence Gould Partnership
General Consultee	Agent	Lawson Planning Partnership
General Consultee	Agent	Les Brown Associates
General Consultee	Agent	Levvel Consulting Ltd
General Consultee	Agent	Lidl UK
General Consultee	Agent	Listed Buildings and Conservation Planning Ltd
General Consultee	Agent	M Falcon Property Solutions
General Consultee	Agent	Marrons Planning
General Consultee	Agent	Martin Robeson Planning Practise
General Consultee	Agent	Michael J Yarham
General Consultee	Agent	Michael P Coe Architectural Services
General Consultee	Agent	Millard Tuddenham

Who was invited to be involved at each consultation stage? A

	Consultee Group / Type	Organisation Name
General Consultee	Agent	Mono Consultants
General Consultee	Agent	Montagu Evans LLP
General Consultee	Agent	Morston Palatine Ltd
General Consultee	Agent	NFK Planning Consultancy Ltd
General Consultee	Agent	Norfolk & Norwich Architecture Ltd
General Consultee	Agent	Norfolk Land Limited
General Consultee	Agent	North Associates Land & Property Specialists
General Consultee	Agent	North Norfolk Plans
General Consultee	Agent	NPS Group
General Consultee	Agent	NPS Property Consultants (Head Office)
General Consultee	Agent	NPS Property Consultants Ltd
General Consultee	Agent	O A Chapman
General Consultee	Agent	Orari Development Transport Planning
General Consultee	Agent	Outwoods Environmental Consultants
General Consultee	Agent	Owen Bond Partnership
General Consultee	Agent	Oxbury Chartered Surveyors
General Consultee	Agent	P H Design and Planning Ltd
General Consultee	Agent	Parker Planning Services
General Consultee	Agent	Parsons & Whittley
General Consultee	Agent	Paul Robinson Partnership
General Consultee	Agent	Paul Savory MCIAT
General Consultee	Agent	Peacock and Smith
General Consultee	Agent	Pegasus Planning Group
General Consultee	Agent	Penwarden Hale Architects
General Consultee	Agent	Peter Moore Planning
General Consultee	Agent	Pigeon Investment Management Ltd
General Consultee	Agent	Pike Partnership
General Consultee	Agent	Planning Issues
General Consultee	Agent	Planning Potential
General Consultee	Agent	Planware Ltd
General Consultee	Agent	Plot of Gold
General Consultee	Agent	Priors Estate Agents
General Consultee	Agent	Purslows Chartered Building Surveyors Ltd
General Consultee	Agent	Rapleys LLP

A Who was invited to be involved at each consultation stage?

	Consultee Group / Type	Organisation Name
General Consultee	Agent	Raven Land Management Ltd
General Consultee	Agent	Raymond Stemp Associates
General Consultee	Agent	Reynolds Jury Architecture Ltd
General Consultee	Agent	RG+P Ltd
General Consultee	Agent	Richard Pike Associates
General Consultee	Agent	Richborough Estates Ltd
General Consultee	Agent	Robert Lord Associates
General Consultee	Agent	Rodney Hale-Sutton Chartered Architect
General Consultee	Agent	Rodney Palmer Architectural Services Ltd
General Consultee	Agent	Ross Powesland Associates
General Consultee	Agent	Roythorne & Co
General Consultee	Agent	RPS Planning (Cambridge)
General Consultee	Agent	Rural Solutions
General Consultee	Agent	S&P Architects
General Consultee	Agent	Sally Minns & Associates
General Consultee	Agent	Savills
General Consultee	Agent	Shakespeare Martineau LLP
General Consultee	Agent	Simon Westaway Associates
General Consultee	Agent	Sketcher Partnership
General Consultee	Agent	Small Fish
General Consultee	Agent	SMB Property Consultancy
General Consultee	Agent	Smiths Gore
General Consultee	Agent	Southern Planning Practice Ltd
General Consultee	Agent	Sowerby's Estate Agents
General Consultee	Agent	SSA Planning Ltd
General Consultee	Agent	Stead Mutton Griggs Architects
General Consultee	Agent	Steeles (Law) LLP
General Consultee	Agent	Stratus Environmental Ltd
General Consultee	Agent	Strutt & Parker LLP
General Consultee	Agent	Sworders
General Consultee	Agent	T J Goodwin & Associates
General Consultee	Agent	Taylor Woodrow Developments Ltd
General Consultee	Agent	TBC Le May Design & Build
General Consultee	Agent	Tetlow King Planning

Who was invited to be involved at each consultation stage? A

	Consultee Group / Type	Organisation Name
General Consultee	Agent	The Planning Bureau Limited
General Consultee	Agent	Thomas Wilham Gaze & Son
General Consultee	Agent	Thompson Associates Ltd
General Consultee	Agent	Tribal Group (MJP)
General Consultee	Agent	Tudor Property Agents Ltd
General Consultee	Agent	Tufeco
General Consultee	Agent	Wensum Associates
General Consultee	Agent	Wheatman Planning
General Consultee	Agent	White Lodge Properties Ltd
General Consultee	Agent	Wood Stephen Ltd
General Consultee	Agent	Woodrows Chartered Surveyors
General Consultee	Agent	Woods Hardwick Planning Ltd
General Consultee	Agent	Wyg Planning
General Consultee	Coastal	Associated British Ports (Lowestoft)
General Consultee	Coastal	Associated British Ports (King's Lynn & Lowestoft)
General Consultee	Coastal	Coastal Concern Action Group (CCAG)
General Consultee	Coastal	Coastal Concern Bacton
General Consultee	Coastal	Coastal Concern Ltd
General Consultee	Coastal	EastPort UK
General Consultee	Coastal	Happisburgh Coast Watch
General Consultee	Coastal	Marine Conservation Society
General Consultee	Coastal	Maritime & Coastguard Agency
General Consultee	Coastal	Norfolk Coast AONB Partnership
General Consultee	Coastal	North Norfolk Coastal Forum
General Consultee	Coastal	Overstrand Shoreline Management Committee
General Consultee	Coastal	RNLI Sheringham
General Consultee	Coastal	Unknown
General Consultee	Coastal	Wells Harbour Commissioners
General Consultee	Developer	Abbeyfield Fakenham Society
General Consultee	Developer	Abbeyfield Sheringham
General Consultee	Developer	Abel Homes Ltd
General Consultee	Developer	Allied Earth Developments Ltd
General Consultee	Developer	Anglian Development Ltd
General Consultee	Developer	Bloor Homes Eastern

A Who was invited to be involved at each consultation stage?

	Consultee Group / Type	Organisation Name
General Consultee	Developer	Bovis Homes Ltd (South East)
General Consultee	Developer	Broadland Housing Association
General Consultee	Developer	Building Partnerships
General Consultee	Developer	Bullen Developments Ltd
General Consultee	Developer	C E Davidson Ltd
General Consultee	Developer	Caddow Design and Build Ltd
General Consultee	Developer	Castlemore
General Consultee	Developer	Circle Anglia Housing
General Consultee	Developer	Circle Housing Wherry
General Consultee	Developer	Coke Estates Ltd
General Consultee	Developer	Cotman Housing Association
General Consultee	Developer	Cripps Development Ltd
General Consultee	Developer	EAC
General Consultee	Developer	F W Smith Builders Ltd
General Consultee	Developer	Fairstead Homes Ltd
General Consultee	Developer	Fisher Bullen
General Consultee	Developer	Flagship Foyers
General Consultee	Developer	Flagship Housing Group
General Consultee	Developer	FW Properties
General Consultee	Developer	Garden Link Homes Ltd
General Consultee	Developer	Gilden Developments Ltd
General Consultee	Developer	Gladman Developments Ltd
General Consultee	Developer	Grays of Norwich Ltd
General Consultee	Developer	Hanover Housing Association
General Consultee	Developer	Hastoe Housing Association (East)
General Consultee	Developer	HBF (Home Builders Federation)
General Consultee	Developer	Homes for Wells
General Consultee	Developer	Hopkins Homes Ltd
General Consultee	Developer	Housing & Care 21
General Consultee	Developer	J K Developments
General Consultee	Developer	John Grooms Housing Association / Liveability
General Consultee	Developer	Larkfleet Homes
General Consultee	Developer	Location 3 Properties Ltd
General Consultee	Developer	Martin King Construction Ltd

Who was invited to be involved at each consultation stage? A

	Consultee Group / Type	Organisation Name
General Consultee	Developer	McCarthy & Stone Ltd
General Consultee	Developer	Michael McNamara Associates
General Consultee	Developer	Morston Assets Ltd
General Consultee	Developer	N R Powell Developments Ltd
General Consultee	Developer	Norfolk Homes Ltd
General Consultee	Developer	North British Housing
General Consultee	Developer	Orbit Housing Association (Eastern Region)
General Consultee	Developer	Peal Estates LLP
General Consultee	Developer	Peart & Barrell Ltd
General Consultee	Developer	Peddars Way Housing Association
General Consultee	Developer	Persimmon Homes (Anglia) Ltd
General Consultee	Developer	PF & ST Brown Properties Ltd
General Consultee	Developer	Places for People
General Consultee	Developer	Project Etopia
General Consultee	Developer	R G Carter Holdings Ltd
General Consultee	Developer	Renaissance Lifecare Plc
General Consultee	Developer	Southrepps Development Ltd
General Consultee	Developer	Sterling Developments Ltd (London)
General Consultee	Developer	Sutherland Homes Ltd
General Consultee	Developer	Taylor Wimpey Developments Ltd
General Consultee	Developer	Taylor Wimpey Strategic Land
General Consultee	Developer	Tesni
General Consultee	Developer	The Guinness Trust
General Consultee	Developer	Thurne Bungalows Management Company Ltd
General Consultee	Developer	Unknown
General Consultee	Developer	Unknown
General Consultee	Developer	Victory Housing Trust
General Consultee	Developer	WestGate Properties (Anglia) Ltd
General Consultee	Developer	Wildmoor Construction Ltd
General Consultee	Disabled Persons	Aylsham Blind Club
General Consultee	Disabled Persons	Deaf Connexions
General Consultee	Disabled Persons	Disability Rights Norfolk
General Consultee	Disabled Persons	Elizabeth Fitzroy Support
General Consultee	Disabled Persons	Equal Lives

A Who was invited to be involved at each consultation stage?

	Consultee Group / Type	Organisation Name
General Consultee	Disabled Persons	Guide Dogs for the Blind Association
General Consultee	Disabled Persons	Holt Visually Impaired Persons Group (VIP)
General Consultee	Disabled Persons	Norfolk & Norwich Association for the Blind
General Consultee	Disabled Persons	Norfolk Association for the Disabled
General Consultee	Disabled Persons	Norfolk Association of Disabled LGBT People
General Consultee	Disabled Persons	North Norfolk Disability Forum
General Consultee	Disabled Persons	North Norfolk Social Centre for the Blind
General Consultee	Disabled Persons	Opening Doors
General Consultee	Disabled Persons	Royal National Institute for the Blind
General Consultee	Disabled Persons	Stalham & District Club for Blind & Visually Impaired (SIGHT)
General Consultee	Disabled Persons	The Norfolk Deaf Association
General Consultee	Economy	Aylsham & District Traders Association
General Consultee	Economy	Business in the Community
General Consultee	Economy	Business Link East
General Consultee	Economy	CBI East of England
General Consultee	Economy	Cromer Chamber of Commerce
General Consultee	Economy	Cromer Job Centre
General Consultee	Economy	East of England International
General Consultee	Economy	Fakenham Area Business Community (FABCOM)
General Consultee	Economy	Fakenham Chamber of Trade
General Consultee	Economy	Fakenham Chamber of Trade & Commerce
General Consultee	Economy	Federation of Small Businesses
General Consultee	Economy	Holt & District Chamber of Trade
General Consultee	Economy	Job Centre Plus
General Consultee	Economy	National Farmers Union (Holt)
General Consultee	Economy	New Anglia Local Enterprise Partnership (LEP)
General Consultee	Economy	Norfolk & Waveney Enterprise Services (NWES)
General Consultee	Economy	Norfolk Chamber of Commerce
General Consultee	Economy	Norfolk Rural Business Advice Service
General Consultee	Economy	Norfolk Rural Community Council
General Consultee	Economy	North Norfolk Business Forum
General Consultee	Economy	North Walsham Chamber of Commerce
General Consultee	Economy	Sheringham Chamber of Trade
General Consultee	Economy	Stalham Business Association

Who was invited to be involved at each consultation stage? A

	Consultee Group / Type	Organisation Name
General Consultee	Economy	Stalham Traders Association
General Consultee	Economy	Valuation Office Agency
General Consultee	Economy	WEETU
General Consultee	Economy	Wells Business Forum
General Consultee	Economy	Young Enterprise
General Consultee	Education	Aldborough Primary School
General Consultee	Education	Alderman Peel High School
General Consultee	Education	Antingham & Southrepps Community Primary School
General Consultee	Education	Astley Primary School
General Consultee	Education	Aylsham High School
General Consultee	Education	Bacton Community Primary School
General Consultee	Education	Beeston Hall School
General Consultee	Education	Blakeney Primary School
General Consultee	Education	Blenheim Park Community Primary School
General Consultee	Education	Broadland High School
General Consultee	Education	BUILD (Learning Difficulties)
General Consultee	Education	Catfield Primary School
General Consultee	Education	Colby Primary School
General Consultee	Education	Colkirk Primary School
General Consultee	Education	College of West Anglia
General Consultee	Education	Coltishall Primary School
General Consultee	Education	Connexions North Walsham
General Consultee	Education	Corpusty Primary School
General Consultee	Education	Cromer Academy Trust
General Consultee	Education	Cromer Junior School
General Consultee	Education	Cromer Learning for Life Project Manager
General Consultee	Education	East Ruston Area Community School
General Consultee	Education	Easton & Otley College
General Consultee	Education	Erpingham Primary School
General Consultee	Education	Fakenham College
General Consultee	Education	Fakenham High School & College
General Consultee	Education	Fakenham Infant & Junior School
General Consultee	Education	Fakenham Junior School
General Consultee	Education	Gresham Estate Office

A Who was invited to be involved at each consultation stage?

	Consultee Group / Type	Organisation Name
General Consultee	Education	Gresham Village School
General Consultee	Education	Gresham's Preparatory School
General Consultee	Education	Gresham's Pre-Preparatory School
General Consultee	Education	Gresham's School
General Consultee	Education	Happisburgh Primary School
General Consultee	Education	Hickling First School
General Consultee	Education	Hindringham Primary School
General Consultee	Education	Holt Community Primary School
General Consultee	Education	Holt Hall Field Study Centre
General Consultee	Education	Horning Community First School
General Consultee	Education	Kelling Primary School
General Consultee	Education	Langham Village School
General Consultee	Education	Little Snoring Primary School
General Consultee	Education	Ludham Primary School & Nursery
General Consultee	Education	Millfield Primary School
General Consultee	Education	Minorities Attainment and Achievement Service
General Consultee	Education	Mundesley First School
General Consultee	Education	Mundesley Primary School
General Consultee	Education	Neatishead Primary School
General Consultee	Education	Norfolk Adult Education Service
General Consultee	Education	Norfolk Careers Service
General Consultee	Education	Norfolk Connexions
General Consultee	Education	Norfolk Library & Information Service
General Consultee	Education	North Walsham High School
General Consultee	Education	North Walsham Infant School & Nursery
General Consultee	Education	North Walsham Junior School
General Consultee	Education	Northrepps Primary School
General Consultee	Education	Opening Doors
General Consultee	Education	Overstrand Primary School
General Consultee	Education	Paston Sixth Form College
General Consultee	Education	Peacock Childrens Centre
General Consultee	Education	Pensthorpe Conservation Trust
General Consultee	Education	Poppies Day Nursery
General Consultee	Education	Rural Norfolk Federation of High Schools

Who was invited to be involved at each consultation stage? A

	Consultee Group / Type	Organisation Name
General Consultee	Education	Sculthorpe Primary School
General Consultee	Education	Sheringham Community Primary School
General Consultee	Education	Sheringham High School and Sixth Form Centre
General Consultee	Education	Sheringham Woodfields School
General Consultee	Education	Sidestrand Hall School
General Consultee	Education	St John's Primary School & Nursery
General Consultee	Education	St Mary's Primary School
General Consultee	Education	St Nicholas House Preparatory & Kindergarten School
General Consultee	Education	Stalham Academy
General Consultee	Education	Stalham High School
General Consultee	Education	Stalham Infant School
General Consultee	Education	Stibbard All Saints Primary School
General Consultee	Education	Suffield Park Infant & Nursery School
General Consultee	Education	Sure Start Children's Centres (North Norfolk)
General Consultee	Education	Sutton Infant School
General Consultee	Education	Swanton Abbott Community Primary School
General Consultee	Education	Tunstead Primary School
General Consultee	Education	Unknown
General Consultee	Education	Walsingham Community Primary School
General Consultee	Education	Wells Children Centre
General Consultee	Education	Wells Field Study Centre
General Consultee	Education	Wells Learning Community
General Consultee	Education	Wells Primary & Nursery School
General Consultee	Education	West Raynham Primary School
General Consultee	Education	Worstead Primary School
General Consultee	Electricity / Gas Company	Renewable Energy Systems Ltd
General Consultee	Environment	Association of Drainage Authorities
General Consultee	Environment	British Geological Society
General Consultee	Environment	Broads Internal Drainage Boards
General Consultee	Environment	Canal & River Trust
General Consultee	Environment	Country Guardian (Opposition to Windfarms)
General Consultee	Environment	CPRE Norfolk
General Consultee	Environment	Cromer In Bloom
General Consultee	Environment	Energy Power Resources Ltd

A Who was invited to be involved at each consultation stage?

	Consultee Group / Type	Organisation Name
General Consultee	Environment	Finn Geotherm
General Consultee	Environment	Forestry Commission
General Consultee	Environment	Friends of the Earth
General Consultee	Environment	Geological Society of Norfolk
General Consultee	Environment	Inland Waterways Association
General Consultee	Environment	Inland Waterways Association (Ipswich Branch)
General Consultee	Environment	Kongskilde UK Ltd
General Consultee	Environment	Low Carbon Innovation Centre (LCIC)
General Consultee	Environment	Manor Farm (Wells) Management Ltd
General Consultee	Environment	No to Relay Stations (N2RS)
General Consultee	Environment	Norfolk & Norwich Naturalists Society
General Consultee	Environment	Norfolk Biodiversity Partnership
General Consultee	Environment	Norfolk Biological Records Centre
General Consultee	Environment	Norfolk Climate Change Partnership
General Consultee	Environment	Norfolk Farming & Wildlife Advisory Group (FWAG)
General Consultee	Environment	Norfolk Gardens Trust
General Consultee	Environment	Norfolk Geodiversity Partnership
General Consultee	Environment	Norfolk Ornithologists Association
General Consultee	Environment	Norfolk Rivers Internal Drainage Board
General Consultee	Environment	Norfolk Wildlife Trust
General Consultee	Environment	North Norfolk Community Woodland Trust
General Consultee	Environment	North Norfolk Environment Forum
General Consultee	Environment	North Walsham Amenity Society
General Consultee	Environment	Pensthorpe Waterfowl Park
General Consultee	Environment	PMC Harvesters Ltd
General Consultee	Environment	Renewable UK
General Consultee	Environment	Renewables East
General Consultee	Environment	Royal Society for the Protection of Birds (RSPB)
General Consultee	Environment	RW & CJ Shearing and Son
General Consultee	Environment	Stalham Environment Group
General Consultee	Environment	The Broads Society
General Consultee	Environment	The Conservation Volunteers
General Consultee	Environment	The Norfolk Bat Group
General Consultee	Environment	The Open Spaces Society

Who was invited to be involved at each consultation stage? A

	Consultee Group / Type	Organisation Name
General Consultee	Environment	The Woodland Trust
General Consultee	Environment	Three Rivers Way Association
General Consultee	Environment	Tyndall Centre for Climate Change Research
General Consultee	Environment	UK Rainwater Management Association
General Consultee	Environment	Water Management Alliance
General Consultee	Environment	Wells Flood Action Group
General Consultee	Environment	Whole House Energy
General Consultee	Environment	Wild Anglia
General Consultee	Environment	Worstead Amenity Society
General Consultee	Food / Agriculture	Anglia Maltings (Holdings) Ltd
General Consultee	Food / Agriculture	Calthorpe Farm Ltd
General Consultee	Food / Agriculture	Compassion in World Farming
General Consultee	Food / Agriculture	Jonas Seafoods
General Consultee	Food / Agriculture	Kinnerton Confectionery Limited
General Consultee	Food / Agriculture	National Farmers Union (East Anglia)
General Consultee	Food / Agriculture	National Farmers Union (East Norfolk Branch)
General Consultee	Food / Agriculture	National Farmers Union (North Walsham)
General Consultee	Food / Agriculture	North Norfolk Fishermen's Society
General Consultee	Food / Agriculture	Osprey Foods International Ltd.
General Consultee	Food / Agriculture	Pioneering Foods
General Consultee	Food / Agriculture	Sheringham Fishermen's Association
General Consultee	Food / Agriculture	Stody Estate Ltd
General Consultee	Food / Agriculture	Westwick Fruit Farms Ltd
General Consultee	Food / Agriculture	Whitwell Hall Farms Ltd
General Consultee	Food / Agriculture	Worstead Farms Ltd
General Consultee	Gypsies, Travellers & Travelling Showpeople	London Gypsy and Traveller Unit
General Consultee	Gypsies, Travellers & Travelling Showpeople	National Federation of Gypsy Liaison Groups
General Consultee	Gypsies, Travellers & Travelling Showpeople	Norfolk Traveller Liaison Officer
General Consultee	Gypsies, Travellers & Travelling Showpeople	Showmen's Guild (Norwich & Eastern Counties)
General Consultee	Gypsies, Travellers & Travelling Showpeople	The Gypsy Council
General Consultee	Health	Aldborough Surgery
General Consultee	Health	Birchwood Surgery

A Who was invited to be involved at each consultation stage?

	Consultee Group / Type	Organisation Name
General Consultee	Health	British Red Cross
General Consultee	Health	Carers Council for Norfolk
General Consultee	Health	Cromer Hospital
General Consultee	Health	Cromer Medical Practice
General Consultee	Health	East Anglian Ambulance NHS Trust
General Consultee	Health	Fakenham Medical Practice
General Consultee	Health	Health Education East of England
General Consultee	Health	Holt Medical Practice
General Consultee	Health	Hoveton & Wroxham Medical Centre
General Consultee	Health	Kelling Hospital
General Consultee	Health	Ludham Medical Practice
General Consultee	Health	Mundesley Medical Centre
General Consultee	Health	Norfolk & Norwich University Hospital NHS Trust
General Consultee	Health	Norfolk & Suffolk NHS Foundation Trust
General Consultee	Health	Norfolk Community Health & Care NHS Trust
General Consultee	Health	Norfolk Health & Wellbeing Board
General Consultee	Health	Norfolk Mental Health Care Trust
General Consultee	Health	Norwich Carers Support
General Consultee	Health	Paston Surgery
General Consultee	Health	Shelter
General Consultee	Health	Sheringham Medical Practice
General Consultee	Health	St John Ambulance Norfolk
General Consultee	Health	Stalham Green Surgery
General Consultee	Health	The Staithe Surgery
General Consultee	Health	Wellbeing in North Norfolk
General Consultee	Health	Wells Community Hospital
General Consultee	Health	Wells Health Centre
General Consultee	Historic Environment	Ancient Monuments Society
General Consultee	Historic Environment	Battlefields Trust
General Consultee	Historic Environment	Council for British Archaeology
General Consultee	Historic Environment	Cromer Preservation Society
General Consultee	Historic Environment	Fakenham Area Conservation Team
General Consultee	Historic Environment	National Trust (Local Office)
General Consultee	Historic Environment	Norfolk Historic Buildings Group

Who was invited to be involved at each consultation stage? A

	Consultee Group / Type	Organisation Name
General Consultee	Historic Environment	Norfolk Historic Environment Service
General Consultee	Historic Environment	North Norfolk Historic Building Trust
General Consultee	Historic Environment	Sheringham & District Preservation Society
General Consultee	Historic Environment	Sheringham and District Preservation Society
General Consultee	Historic Environment	Society for the Protection of Ancient Buildings
General Consultee	Historic Environment	The Georgian Group
General Consultee	Historic Environment	Twentieth Century Society
General Consultee	Landowner	A.G. Brown Builders Ltd
General Consultee	Landowner	A.J and S.A Hicks
General Consultee	Landowner	Aldborough Farms Ltd
General Consultee	Landowner	Aldborough Hall Estates Ltd
General Consultee	Landowner	Arthur Wilson (Estates) Ltd
General Consultee	Landowner	Bakers of North Walsham
General Consultee	Landowner	Bernard Matthews PLC
General Consultee	Landowner	Bluebird Travel
General Consultee	Landowner	Bond Architects
General Consultee	Landowner	Bramley Patnership
General Consultee	Landowner	Bullen Investments Ltd
General Consultee	Landowner	C T & J M Brown
General Consultee	Landowner	CC Payne & Son
General Consultee	Landowner	Chircholme Ltd
General Consultee	Landowner	Church Commissioners for England
General Consultee	Landowner	City & Provincial Properties Plc
General Consultee	Landowner	City and Provincial Properties Plc
General Consultee	Landowner	CityGate Developments
General Consultee	Landowner	Country Land & Business Association
General Consultee	Landowner	Cripps Developments Ltd
General Consultee	Landowner	Cromer Cricket Club
General Consultee	Landowner	Crown Estate
General Consultee	Landowner	Crown Rock Holdings
General Consultee	Landowner	Diocese of Norwich
General Consultee	Landowner	Duchy of Cornwall
General Consultee	Landowner	Duke of Edinburgh Freehouse
General Consultee	Landowner	E G Harrison & Co

A Who was invited to be involved at each consultation stage?

	Consultee Group / Type	Organisation Name
General Consultee	Landowner	East Coast Plastics Ltd
General Consultee	Landowner	Fakenham Cattle Market Co. Ltd
General Consultee	Landowner	Fakenham Rugby Club
General Consultee	Landowner	Fields in Trust (NPFA)
General Consultee	Landowner	Filby Partnership
General Consultee	Landowner	George Youngs Farms Ltd
General Consultee	Landowner	Greshams School Property Trust & Fishmonger's Company
General Consultee	Landowner	Heart of Norfolk Oddfellows
General Consultee	Landowner	Heath Farms Ltd
General Consultee	Landowner	Herbert Graves (Briston) Limited
General Consultee	Landowner	Holkham Estate
General Consultee	Landowner	Hopkins Homes
General Consultee	Landowner	Hoveton Hall Estate
General Consultee	Landowner	J P Rossi & Partners
General Consultee	Landowner	JA Paterson & Co
General Consultee	Landowner	Jetspark
General Consultee	Landowner	Johnson Brothers (Fakenham) Ltd
General Consultee	Landowner	Ladbrook Engineering & Manufacturing Co Ltd
General Consultee	Landowner	National Trust (East of England Regional Office)
General Consultee	Landowner	New Hall Properties Ltd
General Consultee	Landowner	NHS Estates
General Consultee	Landowner	Noble Properties Ltd
General Consultee	Landowner	Norfolk Farm Produce Ltd
General Consultee	Landowner	Norfolk Homes Ltd
General Consultee	Landowner	North Norfolk Business Centre
General Consultee	Landowner	North Norfolk District Council
General Consultee	Landowner	Ortona Ltd
General Consultee	Landowner	Paston Sixth Form College
General Consultee	Landowner	Persimmon Homes (Anglia) Ltd
General Consultee	Landowner	Pigeon Investment Management Ltd
General Consultee	Landowner	Post Office Property Holdings
General Consultee	Landowner	Premier Foods Ltd
General Consultee	Landowner	Priory Holdings Ltd
General Consultee	Landowner	R & J M Place

Who was invited to be involved at each consultation stage? A

	Consultee Group / Type	Organisation Name
General Consultee	Landowner	R.G. Medler
General Consultee	Landowner	R.G.Grimes Will Trust
General Consultee	Landowner	Raynham Estate
General Consultee	Landowner	RBR Crops
General Consultee	Landowner	RER Properties Ltd
General Consultee	Landowner	RG Carter Farms Ltd
General Consultee	Landowner	RNLI Sheringham
General Consultee	Landowner	Robin Hood Public House
General Consultee	Landowner	Robinson Volkswagen
General Consultee	Landowner	S P Marriot
General Consultee	Landowner	Shell UK Ltd
General Consultee	Landowner	Stody Estate Ltd
General Consultee	Landowner	Sutherland Homes
General Consultee	Landowner	T Purdy Ltd
General Consultee	Landowner	Taylor Wimpey Developments Ltd
General Consultee	Landowner	Tesco Stores Ltd
General Consultee	Landowner	Thaxters of Holt Ltd
General Consultee	Landowner	The Building Department, Holkham Estate
General Consultee	Landowner	The East Coast Motor Company Ltd
General Consultee	Landowner	The John H Stracey Public House
General Consultee	Landowner	The Miss H.D.Knott Will Trust
General Consultee	Landowner	Trustees for Wordingham & Waller Trust
General Consultee	Landowner	W J Bracy Ltd
General Consultee	Landowner	Walsingham Estate Group
General Consultee	Landowner	Wayware Ltd
General Consultee	Landowner	White Lodge Properties Ltd
General Consultee	Landowner	Castlemore Holdings
General Consultee	Landowner	Cherryridge Poultry Ltd
General Consultee	Landowner	Holkham Estate
General Consultee	Landowner	Royal British Legion
General Consultee	Landowner	Victory Housing Trust
General Consultee	Landowner	Wildmoor Properties
General Consultee	Local Authority	Greater Norwich Growth Board
General Consultee	Local Authority	Norfolk County Council

A Who was invited to be involved at each consultation stage?

	Consultee Group / Type	Organisation Name
General Consultee	Local Authority	Norfolk County Council (Sustainability)
General Consultee	Local Authority	Norfolk County Council Social Services
General Consultee	Local Authority	Norfolk Strategic Services Coordinating Group
General Consultee	Local Authority	North Norfolk District Council
General Consultee	Older / Younger People	1960's Pensioners Club
General Consultee	Older / Younger People	Action 4 Youth
General Consultee	Older / Younger People	Age Concern (Norfolk)
General Consultee	Older / Younger People	Age Concern (North Norfolk)
General Consultee	Older / Younger People	Age UK
General Consultee	Older / Younger People	BREAK (Sheringham)
General Consultee	Older / Younger People	BREAK (Stalham)
General Consultee	Older / Younger People	Children & Young People's Strategic Partnership Board
General Consultee	Older / Younger People	Crossroads Care (Norwich & East Norfolk)
General Consultee	Older / Younger People	Fakenham & District Day Centre
General Consultee	Older / Younger People	Glaven Community Care
General Consultee	Older / Younger People	Heritage House Day Care Centre
General Consultee	Older / Younger People	Holt & District Day Centre
General Consultee	Older / Younger People	Holt Caring Society
General Consultee	Older / Younger People	Holt Youth Project
General Consultee	Older / Younger People	Norfolk Older Peoples Strategic Partnership
General Consultee	Older / Younger People	Norfolk Youth & Community Service
General Consultee	Older / Younger People	North Norfolk Older People's Forum
General Consultee	Older / Younger People	The Benjamin Foundation
General Consultee	Older / Younger People	Wells & District Pensioners Association
General Consultee	Other	Access 4 Life
General Consultee	Other	Anglia Regional Co-Op Society Ltd
General Consultee	Other	Anstruthers Ltd
General Consultee	Other	Aylsham Partnership
General Consultee	Other	Bacton Homewatch
General Consultee	Other	Bacton Village Hall
General Consultee	Other	Bacton Wednesday Club
General Consultee	Other	Blakeney Neighbourhood Housing Society
General Consultee	Other	British Horse Society
General Consultee	Other	Broadland Boat Foundation

Who was invited to be involved at each consultation stage? A

	Consultee Group / Type	Organisation Name
General Consultee	Other	Buffalo Adventure Motorcycles
General Consultee	Other	Caistor Properties Ltd
General Consultee	Other	Campaign for Real Ale (CAMRA)
General Consultee	Other	Century Printing
General Consultee	Other	Citizens Advice Bureau (Fakenham & Wells)
General Consultee	Other	Clark & Sons
General Consultee	Other	Clifton Park Residents Association
General Consultee	Other	Commission of Architecture and the Built Environment (CABE)
General Consultee	Other	Community Action Norfolk
General Consultee	Other	Co-op Homes Services
General Consultee	Other	Coronation Corner Residents
General Consultee	Other	Create Consulting Engineers Ltd
General Consultee	Other	Creative Constructions (Norfolk) Limited
General Consultee	Other	Cromer Twinning Association
General Consultee	Other	Devplan UK
General Consultee	Other	East Coast Group Ltd
General Consultee	Other	East Coast Nursery Ltd
General Consultee	Other	East Coast Plastics Ltd
General Consultee	Other	East of England LGA
General Consultee	Other	East of England Local Government Association
General Consultee	Other	Express Printing
General Consultee	Other	Fakenham Cattle Market Co Ltd / James Beck Auctions
General Consultee	Other	Fakenham Community Centre
General Consultee	Other	Fakenham Laundry Services
General Consultee	Other	Fakenham Local History Society
General Consultee	Other	Fakenham Society
General Consultee	Other	First Focus Community Information & Drop-In Centre (Fakenham)
General Consultee	Other	Friends of North Lodge Park
General Consultee	Other	G.S. Whitehead Building Contractors
General Consultee	Other	GL Hearn
General Consultee	Other	Happisburgh Lighthouse Trust
General Consultee	Other	Happisburgh Village Hall
General Consultee	Other	Hilton Offshore & Marine Ltd
General Consultee	Other	Hollywood Cinema

A Who was invited to be involved at each consultation stage?

	Consultee Group / Type	Organisation Name
General Consultee	Other	Holt Community Centre
General Consultee	Other	Holt History Group
General Consultee	Other	Horton Levi Ltd
General Consultee	Other	Index Property Information
General Consultee	Other	JF & CE Gooch Garage Services
General Consultee	Other	Ladbrook MFG Ltd
General Consultee	Other	Larking Gowen Accountants
General Consultee	Other	Listawood Holdings Ltd
General Consultee	Other	Matlaske Road Garage Ltd
General Consultee	Other	Melton Constable Community Trust
General Consultee	Other	Mundesley Volunteer Inshore Rescue Service
General Consultee	Other	National Federation of Builders
General Consultee	Other	NFU Mutual
General Consultee	Other	NNHT Central Area Tenant Representative
General Consultee	Other	Norfolk Association of Village Halls
General Consultee	Other	Norfolk Citizens Advice (North Walsham)
General Consultee	Other	Norfolk Community Safety Partnership
General Consultee	Other	Norfolk Fire & Rescue Service
General Consultee	Other	Norfolk Fire & Rescue Service (Eastern District)
General Consultee	Other	North Norfolk Safer Neighbourhoods Team
General Consultee	Other	North Walsham Community Association
General Consultee	Other	North Walsham Pensioners Association
General Consultee	Other	Norwich & Norfolk Voluntary Services (Cromer)
General Consultee	Other	Norwich & Norfolk Voluntary Services (Fakenham)
General Consultee	Other	Norwich & Norfolk Voluntary Services (North Walsham)
General Consultee	Other	Omega Citylifts Ltd
General Consultee	Other	Overstrand Millenium Group & Residents Association
General Consultee	Other	Owls Residents Association
General Consultee	Other	Planning Aid England
General Consultee	Other	Ropecall Ltd
General Consultee	Other	Ropes Hill Dyke Residents Association
General Consultee	Other	Royal British Legion
General Consultee	Other	Royal Mail Group (c/o Atisreal)
General Consultee	Other	Sheringham Community Centre

Who was invited to be involved at each consultation stage? A

	Consultee Group / Type	Organisation Name
General Consultee	Other	Sheringham Little Theatre
General Consultee	Other	Southrepps Support Group
General Consultee	Other	Spalding & Co.
General Consultee	Other	Stewart Ross Associates
General Consultee	Other	Structure-flex Ltd
General Consultee	Other	T Purdy Ltd
General Consultee	Other	Thaxters
General Consultee	Other	The Holt Society
General Consultee	Other	The Royal British Legion (Norfolk)
General Consultee	Other	The Ship Inn P.H
General Consultee	Other	The Theatres Trust
General Consultee	Other	Voluntary Norfolk
General Consultee	Other	Wells Community Association
General Consultee	Other	Wells Local History Group
General Consultee	Other	Weybourne Village Hall
General Consultee	Other	White Horse Public House
General Consultee	Other	Witton PC/PG Products Ltd
General Consultee	Other	YESU
General Consultee	Parish Councillor	Cromer Town Council
General Consultee	Parish Councillor	North Walsham Town Council
General Consultee	Parish Councillor	Sheringham Town Council
General Consultee	Parish Councillor	Walcott Parish Council
General Consultee	Racial/Ethnic/National Groups	Carribbean and African Network
General Consultee	Racial/Ethnic/National Groups	Equality & Human Rights Commission
General Consultee	Racial/Ethnic/National Groups	Norfolk & Norwich Asian Society
General Consultee	Racial/Ethnic/National Groups	Norfolk & Norwich Muslim Association
General Consultee	Racial/Ethnic/National Groups	Norfolk African Community Association
General Consultee	Racial/Ethnic/National Groups	Norfolk Chinese Community Association
General Consultee	Racial/Ethnic/National Groups	Norfolk Community Relations and Equality Board
General Consultee	Racial/Ethnic/National Groups	Norfolk Ethnic Minority Support Forum
General Consultee	Racial/Ethnic/National Groups	North Walsham & District Womens Institute
General Consultee	Racial/Ethnic/National Groups	Norwich & Norfolk Racial Equality Council
General Consultee	Racial/Ethnic/National Groups	Norwich International Cultural Integration
General Consultee	Regeneration	Regenerate North Walsham

A Who was invited to be involved at each consultation stage?

	Consultee Group / Type	Organisation Name
General Consultee	Religious Group	Lighthouse Community Church
General Consultee	Religious Groups	Anglican Church, West Runton
General Consultee	Religious Groups	Christian Science Society
General Consultee	Religious Groups	Church Commissioners for England
General Consultee	Religious Groups	Churches in Wells
General Consultee	Religious Groups	Cromer Parish Church
General Consultee	Religious Groups	Diocese of Norwich
General Consultee	Religious Groups	EP Youth
General Consultee	Religious Groups	Evangelical Congregational Church, North Walsham
General Consultee	Religious Groups	Fakenham Baptist Community Church
General Consultee	Religious Groups	Fakenham Parish Church
General Consultee	Religious Groups	Fakenham Roman Catholic Church
General Consultee	Religious Groups	Holt Methodist Church
General Consultee	Religious Groups	Jehovah's Witnesses in Norfolk
General Consultee	Religious Groups	Mundesley Methodist Church
General Consultee	Religious Groups	New Life Community Church, North Walsham
General Consultee	Religious Groups	Norfolk No.1 Circuit of Jehovah's Witnesses
General Consultee	Religious Groups	North Norfolk Methodist Circuit
General Consultee	Religious Groups	North Walsham Baptist Church
General Consultee	Religious Groups	North Walsham Catholic Church
General Consultee	Religious Groups	North Walsham Congregation of Jehova's Witnesses
General Consultee	Religious Groups	North Walsham Methodist Church
General Consultee	Religious Groups	North Walsham Quakers
General Consultee	Religious Groups	North Walsham Salvation Army
General Consultee	Religious Groups	Norwich Hebrew Congregation
General Consultee	Religious Groups	Religious Society of Friends (Quakers) Aylsham
General Consultee	Religious Groups	Roman Catholic Diocese of East Anglia
General Consultee	Religious Groups	Salvation Army Divisional HQ
General Consultee	Religious Groups	Sheringham Salvation Army
General Consultee	Religious Groups	St. Andrews Church, Holt
General Consultee	Religious Groups	St. Josephs Catholic Church, Sheringham
General Consultee	Religious Groups	St. Martins Church, Overstrand
General Consultee	Religious Groups	St. Nicholas Church, Wells-next-the-Sea
General Consultee	Religious Groups	St. Nicholas Parish Church, North Walsham

Who was invited to be involved at each consultation stage? A

	Consultee Group / Type	Organisation Name
General Consultee	Religious Groups	St. Peters, St Marys and Houghton St Giles Churches, Walsingham
General Consultee	Religious Groups	St. Peters Church, Sheringham
General Consultee	Religious Groups	Stibbard Methodist Church
General Consultee	Religious Groups	The Vine Family Church, Holt
General Consultee	Religious Groups	Weybourne All Saints Church
General Consultee	Religious Groups	Weybourne Methodist Church
General Consultee	Religious Groups	Worstead Baptist Church
General Consultee	Retail	Appleyard
General Consultee	Retail	Booker Cash & Carry
General Consultee	Retail	Boots The Chemist
General Consultee	Retail	Leftleys Supermarket
General Consultee	Retail	Nicholsons, Holt
General Consultee	Retail	Picturecraft of Holt
General Consultee	Retail	Roys of Wroxham
General Consultee	Retail	Sainsburys PLC
General Consultee	Retail	Stalham Shopper
General Consultee	Retail	Tesco Stores Ltd
General Consultee	Retail	W J Aldiss Ltd
General Consultee	Retail	W M Morrison Supermarkets (Cromer)
General Consultee	Retail	W M Morrison Supermarkets (Fakenham)
General Consultee	Sport & Recreation	Bacton Bowls Club
General Consultee	Sport & Recreation	British Cycling
General Consultee	Sport & Recreation	Fakenham Cricket Club
General Consultee	Sport & Recreation	Fakenham Golf Club
General Consultee	Sport & Recreation	Fakenham Racecourse Ltd
General Consultee	Sport & Recreation	Fakenham Rugby Club
General Consultee	Sport & Recreation	Fakenham Superbowl
General Consultee	Sport & Recreation	Fakenham Town Football Club
General Consultee	Sport & Recreation	Fields in Trust
General Consultee	Sport & Recreation	Holt Bowls Club
General Consultee	Sport & Recreation	Holt Cricket Club
General Consultee	Sport & Recreation	Holt Football Club
General Consultee	Sport & Recreation	Holt Playing Field Association
General Consultee	Sport & Recreation	Holt Rugby Football Club

A Who was invited to be involved at each consultation stage?

	Consultee Group / Type	Organisation Name
General Consultee	Sport & Recreation	Holt Swimming Club
General Consultee	Sport & Recreation	Lawn Tennis Association
General Consultee	Sport & Recreation	Norfolk Playing Fields Association
General Consultee	Sport & Recreation	North Walsham Bowls & Snooker Club
General Consultee	Sport & Recreation	North Walsham Football Club
General Consultee	Sport & Recreation	North Walsham Sports Centre
General Consultee	Sport & Recreation	Overstrand Carpet Bowls Club
General Consultee	Sport & Recreation	Overstrand Sports Club
General Consultee	Sport & Recreation	Ramblers Association
General Consultee	Sport & Recreation	Sheringham & District Sports Association
General Consultee	Sport & Recreation	Sheringham Golf Club
General Consultee	Tourism	Beach Café
General Consultee	Tourism	Beechwood Hotel
General Consultee	Tourism	Blue Sky Leisure
General Consultee	Tourism	Bolding Way Holiday Cottages
General Consultee	Tourism	British Holiday & Home Parks Association
General Consultee	Tourism	Cable Gap Holiday Park
General Consultee	Tourism	Camping & Caravan Club
General Consultee	Tourism	Castaways Holiday Park
General Consultee	Tourism	Creative Tourism Ideas & Solutions (CTIS)
General Consultee	Tourism	Danum House B&B
General Consultee	Tourism	Fakenham Museum of Gas & Local History
General Consultee	Tourism	Home Farm Holiday Cottages
General Consultee	Tourism	Hotels of North Norfolk
General Consultee	Tourism	Kelling Heath Holiday Park
General Consultee	Tourism	Kiln Cliffs Caravan Park
General Consultee	Tourism	Ludham Hall
General Consultee	Tourism	Mackenzie Hotel Group
General Consultee	Tourism	Manor Caravan Site
General Consultee	Tourism	Norfolk Broads Caravan Park
General Consultee	Tourism	Norfolk Tourist Attractions Association
General Consultee	Tourism	Norfolkbroads.com
General Consultee	Tourism	North Norfolk Hotel & Guest House Association
General Consultee	Tourism	Pinewoods Holiday Park

Who was invited to be involved at each consultation stage? A

	Consultee Group / Type	Organisation Name
General Consultee	Tourism	Richardson Boatyard
General Consultee	Tourism	Sandy Gulls Caravan Park
General Consultee	Tourism	The Crown Hotel
General Consultee	Tourism	The Mo (Sheringham Museum)
General Consultee	Tourism	The Muckleburgh Collection
General Consultee	Tourism	The Museum of the Broads Trust
General Consultee	Tourism	The Pleasaunce
General Consultee	Tourism	Trend Marine Products
General Consultee	Tourism	Undici B&B
General Consultee	Tourism	Visit Britain
General Consultee	Tourism	Visit East Anglia
General Consultee	Tourism	W Underwood Amusements Ltd
General Consultee	Tourism	Wayford Bridge Hotel
General Consultee	Tourism	Wells Youth Hostel Association
General Consultee	Tourism	Weybourne Forest Lodges
General Consultee	Transport	Bluebird Travel
General Consultee	Transport	Coastal Red Ltd t/a Lynx
General Consultee	Transport	Confederation of Passenger Transport
General Consultee	Transport	DB Schenker Rail (UK)
General Consultee	Transport	English, Welsh and Scottish Railway (EWS)
General Consultee	Transport	First Norfolk & Suffolk Bus Group
General Consultee	Transport	Freight Transport Association
General Consultee	Transport	Highways Development Management (North Norfolk)
General Consultee	Transport	Holt, Melton Constable & Fakenham Railway
General Consultee	Transport	Lafarge Aggregates
General Consultee	Transport	Mid Norfolk Railway
General Consultee	Transport	National Air Traffic Services Safeguarding (NATS)
General Consultee	Transport	National Express East Anglia
General Consultee	Transport	National Express East Anglia (Local Office)
General Consultee	Transport	Norfolk & Norwich Transport Action Group
General Consultee	Transport	Norfolk Green
General Consultee	Transport	Norfolk Orbital Railway
General Consultee	Transport	North Norfolk Railway Plc
General Consultee	Transport	North Norfolk Transport & Cycle Group

A Who was invited to be involved at each consultation stage?

	Consultee Group / Type	Organisation Name
General Consultee	Transport	Norwich Airport Limited
General Consultee	Transport	Road Haulage Association
General Consultee	Transport	Sanders Coaches
General Consultee	Transport	Sustrans
General Consultee	Transport	The Bittern Line Partnership
General Consultee	Transport	Wells & Walsingham Light Railway

Table 26 List of General Bodies Consulted (Regulation 18)

In addition to the above a range of individuals have also been consulted that are not known to represent an organisation. These include individual Agents (23), Landowners (265) and Members of the Public (324).

Local Plan Site Visits

Site visits were held between March - May 2018 as an opportunity for Planning Policy & Built Heritage Working Party Members and relevant County Council, Parish, Town and other Local District Members to provide early engagement and to allow local feedback into the site selection process. The visits were aligned to take place prior to site assessment reports being presented at Planning Policy and Built Heritage Working Party.

Topic	Date	Locations visited	Invited	Number of attendees
Visits to sites allocated in current Local Plan following Working Party meeting to provide an update on the overall process of preparing a Local Plan and to explain how the call for sites process would be undertaken	7 December 2015	Hoveton, North Walsham, Stalham	All Members	Maximum of 10
	18 January 2016	Cromer, Holt, Sheringham		Maximum of 14
	15 February 2016	Fakenham, Wells		11
Visits to allow Members to become familiar with the various site options been suggested	19 September 2016	North Walsham, Stalham, Hoveton	Members of Planning Policy and Built Heritage Working Party, relevant Local, County and Town Council Member(s), Local District Member and Parish Council Member(s) where sites fall within adjacent parishes	Maximum of 8
	17 October 2016	Sheringham, Holt, Cromer		Maximum of 15
	14 November 2016	Fakenham, Wells		Maximum of 8

Table 27 Local Plan Site Visits

The following table provides a summary of the site visits:

Who was invited to be involved at each consultation stage? A

Date	Location/s Visited	Invited	Comments
8 March 2018	Mundesley, Stalham, Hoveton, Ludham	Members of Planning Policy and Built Heritage Working Party, relevant District, County and Parish/Town Council Members	<p>Mundesley: the selection of sites in Mundesley were visited with a focus on the sites in the heart of the village around Links Road and Church Lane. Access along Church Lane and Links Road was visited on foot. Other sites to the south of the village were visited – including Gordon Terrace. Local members (including parish) attended and were asked for their views on the sites in Mundesley.</p> <p>There was discussion concerning the relative merits of sites MUN03 & MUN04.</p> <p>Stalham: the sites around Stalham were visited including those along Ingham Road and Steppingstone Lane. Highways and access issues were explored within the town and sites and access along Yarmouth Road were visited. Local members (including parish) attended and were asked for their views on the sites in Stalham and there was debate around the potential for large-scale expansion on the Stepping Stone Lane side of town.</p> <p>Local members expressed their concerns in relation to highways impact of development in the town – particularly on through traffic and the impact on the Yarmouth Road/High Street/Ingham Road junction.</p> <p>Hoveton: the sites in the Tunstead Road and Stalham Road area were visited and there was discussion around the quality of the development delivered by previous allocation and how lessons could be learnt. Sites to the east were visited and members were asked, and gave, their views on the sites for Hoveton.</p> <p>Members raised concerns over the impact of traffic on Littlewood Lane.</p> <p>Ludham: the visit took members all around the village with local members being asked for their views on the sites. There were no particular issues raised about the sites in Ludham.</p>
5 April 2018	Briston, Fakenham, Blakeney		<p>Blakeney: all sites were visited in Blakeney and members were given an opportunity to comment. The landscape impact of the sites was discussed and parish members were keen to showcase a potential 'exceptions' site off the Wiveton Road.</p> <p>The sites along the Langham Road were viewed and there was a broad consensus that the site to the east of Langham Road (BLA04) had less of an impact on the landscape than those sites to the west of Langham Road (BLA01 & BLA09).</p> <p>Fakenham: the sites around Fakenham were visited including the potential large allocation to the north and the sites around the 'Shell' roundabout. Members walked to the site to the south along the River Wensum. Sites around the industrial estate were visited and all local members were asked for their input and views on the sites.</p> <p>Members discussed access proposals to site F10 and the relationship of the access to adjoining properties and the implications for the public right of way.</p> <p>There was detailed discussion around how a large scale allocation would have an impact on the highways and infrastructure for the town.</p> <p>Briston: the collection of sites around Briston were visited including those around the school, those to the north of Norwich Road and the sites to the south of the village. Members were asked for their views on the range of sites for Briston.</p> <p>It was agreed that sites BRI01 & BRI02 were the best located in relation to village services and it was thought that site BRI03 could be a possible site for a smaller allocation.</p>
3 May 2018	Cromer, Sheringham, Wells, Holt		<p>Cromer: the visit took members to the selection of sites for Cromer including those around the Roughton Road, Norwich Road and Overstrand Road. Sites to the west</p>

A Who was invited to be involved at each consultation stage?

Date	Location/s Visited	Invited	Comments
			<p>of the town were visited – including the site at Clifton Park and there was an explanation of the potential for a new primary school on the site. Members were asked for their views on the range of sites for Cromer.</p> <p>Access arrangements off the Norwich Road into site C22 were discussed – in particular the location of a proposed roundabout. Site C10 was view and there was a discussion around coalescence on Cromer with West Runton. It was expressed that development in this location may improve the approach into Cromer – at present it was felt that the existing Clifton Park development and adjoining countryside did not provide an ‘attractive’ or defined entrance into the town.</p> <p>Sheringham: the site visit focussed on the sites along the Holway and Holt Road with members taking the opportunity to visit the Holway Road site on foot to appreciate its landscape setting. Local members were asked for their views and the local member provided input into the need to protect landscape views between Sheringham and Upper Sheringham.</p> <p>Wells: the visit took members all around the village with local members being asked for their views on the sites. The sites to the west of the town which may have an impact on the landscape were viewed from 2 vantage points. Members were asked for their views on the sites and there was discussion around the need for car parking in the town.</p> <p>The issue around the allocation of W01 was discussed in relation to the potential of the site coming forward as an affordable housing scheme.</p> <p>Holt: members visited the sites along the Cley Road and discussed the highways issues along Cley Road and into town. The large sites to the east at Heath Farm were visited together with those to the south and west.</p> <p>Local members gave their views on the sites and particularly the need for a relocated school on a site close to the town. A number of local members stated that their preferred option would be for a new primary school site on site H04.</p>
31 May 2018	North Walsham		<p>North Walsham: The site visit took members (including town council) to see the western sites and an explanation was given about the potential scale of the site and its landscape setting.</p> <p>There was discussion concerning the town’s infrastructure and it was felt that previous allocations had not delivered any improvements for the town. It was stated that such a large-scale allocation would have to make a difference to the town’s infrastructure.</p> <p>The sites to the north were visited with a focus on site NW16. Concern was expressed around the landscape setting of this site and access arrangements and impact on the local road network.</p> <p>A number of other sites were visited and the site visit concluded with a viewing of sites along the Yarmouth Road.</p>

Table 28 Summary of Local Plan Site Visits

Who was invited to be involved at each consultation stage? **A**

B Local Plan Newsletter

Appendix B: Local Plan Newsletter

Newsletter Title	Key Topics Covered
Summer 2015 Newsletter	Launch of the Local Plan, Local Development Scheme, Regulation 18 Notification, Statement of Community Involvement and details of Launch Events.
Winter 2015/16 Newsletter	New Assessment of Housing Need, Search for Potential Development Sites- the 'Call for Sites'.
Special Edition- Town & Parish Council Newsletter (Winter 2015)	Search for Potential Development Sites- the 'Call for Sites'.
Summer 2016 Newsletter	What have we done so far, what's coming up, Town Council Workshops, Parish Workshops, Evidence and Duty to Cooperate (Strategic Housing Market Assessment (SHMA), Five Year Housing Land Supply Statement, Annual Monitoring Report, the Search for Potential Development Sites (Housing and Economic Land Availability Assessment (HELAA), Local Plan Site Assessment) Sustainability Appraisal Scoping Report, Green Build.
Summer 2017 Newsletter	Update on the identification of development sites, Neighbourhood Planning, the draft Norfolk Strategic Framework, Local Green Spaces, updated Strategic Housing Market Assessment, the emerging evidence, next stages, custom and self-build housing, brownfield land registers, five year supply of housing, information on a public inquiry and Green Build.
Summer 2018 Newsletter	Timeline review, agreement on the strategic direction of the plan, the identification of preferred development sites for consultation, the review of development management policies and other guidance, national policy changes, neighbourhood planning update, evidence base update, the agreement of the Norfolk Strategic Planning Framework, the new Strategic Flood Risk Assessment, the Amenity Green Space Topic Paper, the Village Assessment and Settlement Profiles Topic Paper, further studies that are expected to be completed this year, next stages and other activities of the Planning Policy Team.

Table 29 Local Plan Newsletters: Timings and Key Topics

Local Plan Newsletter B

North Norfolk Local Plan 2016 - 2036

Summer 2015 Newsletter


Welcome to the first edition of the Planning Policy newsletter which will be published on a quarterly basis.

The purpose of this newsletter is to keep you informed about the work we are doing in relation to producing the new Local Plan for the district.

The Local Plan provides the planning policy context for development across the whole of North Norfolk. It sets out the policies against which planning applications will be assessed including policies on housing, the economy, community facilities, safeguarding the natural and built environment, adapting to climate change and securing good design. The document will also allocate land for development for housing and employment uses.

We want you to be involved as we develop our new Local Plan and this newsletter sets out the first steps we are taking to achieve this.

We hope you enjoy the first edition and find it useful and informative and we look forward to hearing from you in the future.



The Council is now starting the process to produce a new Local Plan covering the period 2016-2036. The following page of this newsletter outlines the timetable for production of the new Local Plan (The Local Development Scheme (LDS)), the scope of what we think should be included in the new Local Plan (the Regulation 18 notification), and our Statement of Community Involvement (SCI) which sets out how we will consult people throughout the plan-making process. We are seeking your views on some of these documents and details of how to contact us are included in the relevant section of this newsletter.

This is your chance to help shape the future of North Norfolk. We want you to get involved!

Launch of the Local Plan

Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities.

The National Planning Policy Framework (2012) (NPPF) requires Local Planning Authorities (LPAs) to prepare and maintain up to date Local Plans (called 'Development Plans' in legislation). They should comply with national policy and guidance and provide for all development needs whilst being consistent with the principles of sustainable development. Planning decisions must be taken in accordance with the Local Plan unless material considerations indicate otherwise.

The Council's current Local Plans were adopted in 2008 (Core Strategy) and 2011 (Site Allocations) whilst our current policies broadly comply with the NPPF, there are likely to be an increasing number of tensions, especially in relation to which types of development require planning permission. Most notably the NPPF adopts a more pro-development approach than that which underpinned the preparation of our current plans.

Local Development Scheme

The timetable for producing the new Local plan

The Local Development Scheme (LDS) sets out the timetable for the preparation of all Local Plan documents, including which documents are proposed to be prepared and when. It also shows the stages where the public can get involved in the plan-making process.

The preparation of Local Plans is subject to specific regulations, a formal duty to engage positively with other bodies (called the Duty to Co-operate), at least two separate statutory periods of public consultation and independent examination to establish the legal compliance and 'soundness' of the plan. The Local Plan must be based on a credible and proportionate evidence base and should positively seek to address all needs for different types of development. The diagram below shows the milestones we must achieve and when we hope to reach them:

Milestones	Key Stages of Local Plan Preparation	Probational/Timetable
Preparation	Project planning Plan Preparation Notification of Scope of Plan and consultation Evidence gathering Options development Events consultation	June 2015 - July 2017
1	Options development into Draft local plan	August - September 2017
2	Draft Plan Consultation	October 2017
3	Submission preparation	November - December 2017
4	Submission Pre-hearing meeting Determination in public	January - August 2018
5	Inspection report	October - December 2018
6	Adoption	January - March 2019
7	Period for High Court Challenge	

It is not possible to be absolutely certain about the timetable for plan preparation at the start of the process. Experience suggests that there will be delays at various stages and the initial timetable will require adjustment as work proceeds.

The LDS has been through the Council's Cabinet where it was formally agreed that it would take effect from the 3rd August 2015. The document is available on our website at the following page: <http://www.northnorfolk.org/planning/10108.asp>

Figure 2 Example Local Plan Newsletter (Summer 2015) Page 1 & 4

B Local Plan Newsletter

Regulation 18 notification and Statement of Community Involvement

The subject of the new Local Plan and how to get involved

The new Local Plan will provide the planning strategy for the district for the period 2016 - 2036. The Local Plan must establish future levels of housing and economic development and outline the spatial strategy for accommodating such development. It will also include new allocations of land.

The Regulation 18 notification document sets out the subjects the Council considers should be addressed in the new Local Plan. This broadly includes:

- Housing
- Natural and historic environment
- Employment and economic development
- Community and
- Transport

Our online consultation portal is the quickest and simplest method for submitting your comments. Upon registering you will be provided with a unique customer reference which you can use in all future correspondence. Responses can be created at several stages, enabling you to work through the form at your own pace.

However, if you are unable to submit your comments online please use the appropriate consultation response form, which can be found on the following webpage:
www.north-norfolk.gov.uk/localplan and email it to us at planningpolicy@north-norfolk.gov.uk or if you prefer, post your response form to: Planning Policy Team, NNDC, Holt Road, Cromer, NR27 9EN.

What happens next?.....

Two launch events are going to be held where we will explain a little bit more about what a local plan is and answer any questions you might have:

1st September – town and parish councils: 4pm to 6pm, NNDC offices, Holt Road, Cromer;

2nd September – agents and developers: 5pm to 7pm, NNDC offices, Holt Road, Cromer.

If you wish to attend please email planningpolicy@north-norfolk.gov.uk or call 01263 516318 by the 21st August 2015 to book your space.

Following the end of the consultations we need to prepare a large amount of evidence to inform the new Local Plan. This work is expected to take around 18 months to complete. During this time we will keep our website updated with headlines

from the evidence as it is published so you can see our progress.

In addition, we will be undertaking a 'call for sites' which is your opportunity to let us know about any land which you feel is appropriate for development.

Details of all of the above will be kept up to date on our website and the Autumn 2015 edition of this newsletter will contain more information.

If you do not wish to receive future editions of this newsletter, please contact us and we will remove your details from our database.

Telephone: 01263 516318
 Email: planningpolicy@north-norfolk.gov.uk

Figure 3 Example Local Plan Newsletter (Summer 2015) Page 2 & 3

Local Plan Newsletter B

C Stage 1a Consultation Summaries

Appendix C: Stage 1a Consultation Summaries

Local Plan Launch Event: Parish & Town Councils + Members of the Public

Tuesday 1 September 2015, 16:00 – 18:00

Two events on 2 and 3 September 2015 were cancelled due to a lack of demand; an event cancellation post was put on the front page of the NNDC webpage and a notice was placed at the main Council Office reception. A small number of stakeholders who had not confirmed attendance arrived for a cancelled events; they were given the opportunity to have a discussion with a member of the Planning Policy team.

Committee Room, NNDC Council Offices

Type	Numbers
Town/Parish Council representatives	35
NNDC Councillors (one of whom is also a Parish Council representative)	2
Individuals	1

Table 30 Local Plan Launch Event for Parish & Town Councils & Public - Attendance Numbers

Subject Summary of Questions asked by Attendees

- Housing need;
- retail, business and infrastructure development;
- developer contributions;
- ageing population;
- affordable housing;
- tourism;
- renewable energy;
- coastal erosion;
- social isolation;
- dwelling mix;
- second homes;
- Local Plan process;
- brownfield sites;
- 5 Year Land Supply;
- sustainability;
- devolution;
- CIL;
- consultation methods;
- Conservation Area boundaries;
- mobile phone coverage, and;
- Parish Plans

Questions asked by attendees

- Where will information concerning housing need come from? (Thursford PC)
- Do we know what the rough housing figures will be? (Kettlestone PC)
- Will we only be looking at planning development for houses or will we also be looking at planning development for employment, retail, businesses and infrastructure? (North Walsham TC)

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- If NNDC say that we cannot meet the housing need, would there be a requirement for the Council to provide money to other authorities to meet our housing need? What happens if all the authorities do not agree? (North Walsham TC)
- Will the new Local Plan require infrastructure to be provided for development through S106 agreements? (North Walsham TC)
- Would developer requirements for identified sites be agreed with Town Councils or would the District Councils decide? (North Walsham TC)
- Concern raised about the 'blight' of small villages. For example, villages are left with only the elderly and the young move away. Care for the elderly then has to be picked up by the Council. Paston needs population increase. (Paston PC)
- Will affordable housing pay a market price for land? Would NNDC exercise our Compulsory Purchase Powers? (Paston PC)
- Would we grant development for affordable housing on land where we would not normally allow housing? (Paston PC)
- Would NNDC consider lifting holiday restrictions on holiday accommodation properties? (Gresham Parish Council)
- Will NNDC be looking at renewables as part of the Local Plan process?
- Concern raised- NNDC must ensure there is sufficient infrastructure to meet housing. (Unknown)
- Will we be factoring in relocation due to coastal erosion? (Walcott PC)
- NNDC should consider social isolation as part of the process (Erpingham PC and Erpingham Ward District Councillor)
- Is a developer exempt from building a truly mixed development (in terms of dwelling sizes) if they offer to have affordable housing? (Holt TC)
- Where does the requirement for dwelling mix come from? For example, who decides if smaller houses are needed? (Holt TC)
- Second homes impact hugely on North Norfolk. Can NNDC have a policy on second homes? Are second homes going to be considered? (Unknown)
- What determines affordability for a dwelling? (Unknown)
- When are we going to speak to the other big stakeholders about the Local Plan (e.g. National Trust)? (Beeston Regis PC)
- Does 'ring fencing' some second homes include caravans? (Stiffkey PC)
- Do we have a percentage of Affordable Housing that will be needed in mind? (Stiffkey PC)
- Is 10 dwellings the starting number for affordable housing? (Stiffkey PC)
- Might we look at allowing development of existing caravan sites for housing? (Stiffkey PC)
- Will Government legislation on brownfield sites blow a hole in the Local Plan? (Holt TC)
- If the appeal at Holt is approved, would this be added onto the 5 year land supply and would this then mean that the Sculthorpe application for 200 homes is refused? (Sculthorpe PC)
- If a site is unsustainable, then does this 'kill the application'? (Sculthorpe PC)
- Who would go to an appeal for the Sculthorpe application for 200 homes? (Sculthorpe PC)
- How will the Local Plan process be affected by devolution? Would any work on the Local Plan be handed over to whoever took it over? (Cromer TC)
- Will we be looking at CIL again? (Cromer TC)
- For Town and Parish Councils considering neighbourhood plans, what is the best way they can work with the District Council? (Cromer TC)
- Will Local Plan review be looking at changes to conservation area boundaries? (Kelling PC)
- Concern raised that affordable housing does not apply for development of under 10 dwellings (Kelling PC)
- Static caravans are not normally located in places with infrastructure, so how would this work if this became a site for permanent dwellings? (North Walsham TC)
- Point raised: out of 5,000 caravans in the District, 4,000 are second homes. In the holiday seasons, this doubles the populations of village. (North Walsham TC)
- Will mobile reception/broadband and phone masts be looked at as part of process? (Unknown)

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- If a Parish Council has adopted a Parish Plan, is this taken into account? (Unknown)
- Are we looking at having a percentage of housing for older people? (Stiffkey PC)
- To what extent is coastal retreat being taken into account? It is the single biggest issue in North Norfolk. (Paston PC)

C.1 Agents' Forum

Tuesday 8 September 2015, 08:30 - 10:00

Committee Room, NNDC Council Offices

Type	Numbers
Local Agents	13

Table 31 Attendance Numbers

Subject Summary of Questions asked by Attendees

- Coastal erosion

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C Stage 1a Consultation Summaries

C.2 Regulation 18 Notification: Response Form Replies

Rep Ref	Respondent	Policy/ Paragraph	Nature of rep	Summary of Representation	Council Response
LPS 01	Private individual	N/a	Comment	<p>It is necessary for much more housing to be built to address the national housing crisis.</p> <p>We should be encouraging less car use and more sustainable methods of transport. Improvements must be secured through planning applications, for example, securing cycle paths, bus shelters etc.</p> <p>The Council could consider working on a joint plan with neighbouring authorities to secure efficiencies.</p> <p>Explanation to residents is needed about the Government's proposals to intervene if a Local Plan is not in place by 2017.</p> <p>Engaging with visitors is essential as they form a large part of the district's economy.</p> <p>Wording in policies such as 'consider' is too weak. You should seek to 'provide' or 'secure'.</p>	<p>ACCEPTED: A Strategic Housing Market Assessment (SHMA) is currently being prepared to establish objectively assessed need (OAN) for market and affordable housing across the district. This document is nearing publication. The settlement hierarchy in the existing Core Strategy (Sept 2008) will be reviewed and appropriate consideration given to provision for growth in all settlements.</p> <p>ACCEPTED: We will be reviewing our transport policies and considering how we can best promote sustainable transport modes. In addition we will also be reviewing developer contributions from development.</p> <p>ACCEPTED: This has been discussed under the Duty to Cooperate. In order to promote joint working a number of evidence documents will be prepared jointly under the Duty where these affect strategic issues with cross-boundary implications. A Strategic Framework document will be prepared to address significant cross boundary issues.</p> <p>ACCEPTED: The Council considers that this announcement affects the 15% of authorities who currently have no local plan and therefore NNDC is not affected. If this position changes it will be reflected in our Local Development Scheme (LDS). Nevertheless the Council aims to produce a new plan by 2017.</p> <p>ACCEPTED: The Council recently consulted on a draft Statement of Community Involvement (SCI) which sets out how we intend to consult with all stakeholders during plan-making and on planning applications. Local tourism boards, and other tourism related groups/organisations will be consulted in accordance with the Local Planning Regulations (2012).</p>

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Rep Ref	Respondent	Policy/ Paragraph	Nature of rep	Summary of Representation	Council Response
LPS 02	Private individual	N/a	Comment	<p>It is important that we accommodate sustainable housing growth and help mitigate against the risks of climate change including local sea flooding. The impact of climate change on local communities should be carefully considered.</p> <p>Promoting local employment is important, particularly working from home.</p>	<p>ACCEPTED: At this stage the broad subjects to be included in the plan are being considered. When policies are developed the Council acknowledges that the wording will be critical to how that policy is interpreted and implemented.</p> <p>ACCEPTED: The Council is likely to publish a Strategic Flood Risk Assessment to provide evidence on flood risk throughout the district. This evidence document, alongside other strategies such as the Coastline Management Plan would help inform any future policies on climate change and flood risk.</p> <p>ACCEPTED: A 'Business Growth and Investment Opportunities Study' has been commissioned and is currently at draft stage. The document considers the needs of existing businesses, establishes land availability for expansion and growth and seeks to ascertain opportunities for investment. The potential for live/work units will be considered in policy development.</p>
LPS 03	Historic England	N/a	Comment	<p>Imperative to have well informed policies which adequately cover the protection and enhancement of the Historic Environment which is part of the thread of sustainable development in the NPPF. The Historic Environment forms a key role in the main aims and vision for the district and this should be taken forward to 2036. The Historic Environment should be taken forward as a topic in its own right. Specific policies should include the following (not exclusive):</p> <ul style="list-style-type: none"> • Acknowledging, protecting and improving the Significance of Heritage Assets (both designated and non-designated) • Acknowledging protecting and improving the Setting of Heritage Assets (both designated and non-designated) 	<p>ACCEPTED: The Council acknowledges the NPPF requirements with regard to the historic environment. We will consider the need for a specific policy on the Historic Environment when developing policy options. The required areas for consideration are noted and will be considered.</p> <p>ACCEPTED: Historic England will be notified of all policy development and appraisal of specific sites.</p> <p>ACCEPTED: We would welcome engagement with Historic England on the development of Sustainability Appraisal indicators and will consult with them as appropriate throughout the process.</p>

C Stage 1a Consultation Summaries

Rep Ref	Respondent	Policy/ Paragraph	Nature of rep	Summary of Representation	Council Response
LPS 04	Private individual	N/a	Comments	<ul style="list-style-type: none"> • Known and unknown archaeology (both designated and non-designated) • Intangible elements of the Historic Environment such as Cultural Heritage, sense of place, sense of time depth, etc. • Locally significant buildings • Conservation Areas • Registered Parks and Gardens • Opportunities regarding Heritage At Risk <p>We are interested in general housing distribution and specific sites.</p> <p>The development of appropriate indicators for the Sustainability Appraisal is essential.</p>	<p>ACCEPTED: All proposed development sites and all policies will be assessed against sustainability criteria to ensure that development is directed to the most appropriate locations. Policy options will be considered to protect and enhance all natural habitats. Nevertheless some development in the AONB may be necessary to address identified needs.</p> <p>ACCEPTED: The types of a development which are considered acceptable in the countryside will be considered.</p> <p>ACCEPTED: There is a clear Government drive to reuse brownfield land. The Council is preparing to publish a 'call for sites' towards the end of 2015. At that time sites can be put forward for consideration of their development potential.</p>

Stage 1a Consultation Summaries C

Rep Ref	Respondent	Policy/ Paragraph	Nature of rep	Summary of Representation	Council Response
LPS05	Private individual	N/a	Comment	<p>New housing development must be affordable (either for rental or buying). Mechanisms should be put in place to avoid the proliferation of second homes.</p> <p>Flexibility for change of use to enhance our market towns should be considered.</p> <p>Building more affordable homes and encourage less second homes.</p> <p>Restrict urban sprawl of current settlements and rejuvenate the villages by allowing limited development and conversions of existing buildings.</p> <p>Encourage tourism throughout the year and protect the tourism industry.</p> <p>Make the protection of the heritage sites and natural environment a priority. Avoid futuristic eco homes if they are harmful to heritage sites, listed buildings or conservation areas.</p> <p>Restrict HGV movements in villages. Provide more public transport.</p> <p>Encourage brownfield development.</p> <p>Ensure adequate infrastructure is in place to support future development. Discourage the closure of village pubs and shops.</p>	<p>ACCEPTED: A Strategic Housing Market Assessment (SHMA) is currently being prepared to establish objectively assessed need (OAN) for market and affordable housing across the district. This document is nearing publication. The use of dwellings as second homes does not fall under planning control.</p> <p>ACCEPTED: Any new policy on uses within town centres will be flexible and will reflect current permitted development rights for change of use.</p> <p>ACCEPTED: A Strategic Housing Market Assessment (SHMA) is currently being prepared to establish objectively assessed need (OAN) for market and affordable housing across the district. This document is nearing publication. The use of dwellings as second homes does not fall under planning control.</p> <p>ACCEPTED: The settlement hierarchy in the existing Core Strategy (Sept 2008) will be reviewed and appropriate consideration given to provision for growth in all settlements.</p> <p>ACCEPTED: The Council is currently scoping the evidence required to support production of the Local Plan. The need for a Tourism Study will be considered.</p> <p>ACCEPTED: The Council acknowledges the NPPF requirements with regard to the historic environment. We will consider the need for a specific policy on the Historic Environment when developing policy options.</p> <p>ACCEPTED: The adequacy of the highway network to support future levels of growth will be considered alongside policy development and consideration of sites for development.</p>

C Stage 1a Consultation Summaries

Rep Ref	Respondent	Policy/ Paragraph	Nature of rep	Summary of Representation	Council Response
LPS 06	Private individual	N/a	Comment	<p>Small villages need new affordable homes to avoid stagnation and isolation of the elderly.</p> <p>NNDC land at Bears Road, Paston – highways objections can be overcome if a one-way restriction is used.</p> <p>Need housing sites available in land as a result of the retreating coastline. A new coast road at Walcott is needed, further in land.</p>	<p>ACCEPTED: All proposed development sites and all policies will be assessed against sustainability criteria to ensure that development is directed to the most appropriate locations.</p> <p>ACCEPTED: The Council is currently scoping the evidence required to support production of the Local Plan. It is likely that a Strategic Infrastructure Assessment will be prepared under the Duty to Cooperate and a Local Infrastructure Assessment will be required.</p> <p>ACCEPTED: The settlement hierarchy in the existing Core Strategy (Sept 2008) will be reviewed and appropriate consideration given to provision for growth in all settlements.</p> <p>ACCEPTED: The Council is preparing to publish a 'call for sites' towards the end of 2015. At that time sites can be put forward for consideration of their development potential.</p> <p>ACCEPTED: The Council is likely to publish a Strategic Flood Risk Assessment to provide evidence on flood risk throughout the district. This evidence document, alongside other strategies such as the Coastline Management Plan would help inform any future policies on climate change, flood risk and coastal erosion. The adequacy of the highway network will be considered alongside policy development and consideration of sites for development.</p>
LPS 07	Private individual	N/a	Comment	<p>The concept of Service villages should be re-considered. Currently identified service villages have taken on the burden of too much development. Other villages should be allowed to grow. The majority of development should go to larger towns where infrastructure exists already.</p>	<p>ACCEPTED: The settlement hierarchy in the existing Core Strategy (Sept 2008) will be reviewed and appropriate consideration given to provision for growth in all settlements.</p>
LPS 08	Church	N/a	Comment	<p>Strategic matters should focus on:</p>	<p>ACCEPTED: A Strategic Housing Market Assessment (SHMA)</p>

Stage 1a Consultation Summaries C

Rep Ref	Respondent	Policy/ Paragraph	Nature of rep	Summary of Representation	Council Response
	Commissioners for England (Represented by WYG)			<ul style="list-style-type: none"> The level of housing development which can be accommodated in the district (OAN) Provision for economic development and a growing local economy Protection of European nature conservation sites <p>Consideration should be given to developing a strategy for key transport networks and other key infrastructure projects within the district to support the allocation of strategic sites and ensure future development is sustainable and well integrated.</p>	<p>is currently being prepared to establish objectively assessed need (OAN) for market and affordable housing across the district. This document is nearing publication. A 'Business Growth and Investment Opportunities Study' has been commissioned by NNDC and is currently at draft stage. The document considers the needs of existing businesses within the district, establishes land availability for expansion of existing businesses and seeks to ascertain opportunities for growth and investment. The Council is currently scoping the evidence required to support production of the Local Plan and it is likely that a Habitat Regulations Assessment and corresponding Appropriate Assessment will be required to consider impacts of development on European nature conservation sites.</p> <p>ACCEPTED: The Council is currently scoping the evidence required to support production of the Local Plan. It is likely that a Strategic Infrastructure Assessment will be prepared under the Duty to Cooperate and a Local Infrastructure Assessment will be required.</p>
LPS 09	Mobile Operators Association (Represented by Mono Consultants Limited)	N/a	Comment	It is important that there is a specific telecommunications policy within the Local Plan. National guidance recognises this, as does the NPF (paragraphs 42 and 43). (Outline policy included in response).	ACCEPTED: The Council acknowledges the NPPF requirement to include a telecommunications policy in the Local Plan. The enclosed proposed policy wording is welcomed and will be considered during policy development.
LPS 10	The Theatres Trust	N/a	Comment	The Local Plan must contain a policy to safeguard and protect existing community and cultural facilities, as well as encouraging new ones. This is advocated in the NPPF at paragraph 70. (Outline policy included in response).	ACCEPTED: The Council acknowledges the NPPF requirement to include a policy on community and cultural facilities in the Local Plan. The enclosed proposed policy wording is welcomed and will be considered during policy development.

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LPS 11	Private individual	N/a	Comment	<p>We need increased facilities for tourism in the district (more car parks and camp sites).</p> <p>Housing should be for local people, not to relieve need in Norwich. More rented accommodation is needed in villages. Too many houses are being sold for holiday use.</p>	<p>ACCEPTED: The Council is currently scoping the evidence required to support production of the Local Plan. The need for a Tourism Study will be considered.</p> <p>ACCEPTED: A Strategic Housing Market Assessment (SHMA) is currently being prepared to establish objectively assessed need (OAN) for market and affordable housing across the district. This document is nearing publication. Following publication, discussions will be had with neighbouring authorities about the distribution of housing across the housing market area (HMA) and appropriate member endorsement sought. The settlement hierarchy in the existing Core Strategy (Sept 2008) will be reviewed and appropriate consideration given to provision for growth in all settlements. The use of dwellings as holiday homes does not fall under planning control.</p>
LPS 12	Broadland District Council	N/a	Comment	<p>The Council does not wish to comment at this stage but would be happy to engage in the future in accordance with the Duty to Cooperate.</p>	NOTED
LPS 13	Broads Authority	N/a	Comment	<p>No comments on the Regulation 18 document but areas for consideration during policy development have been proposed.</p>	NOTED
LPS 14	Equality and Human Rights Commission	N/a	Comment	<p>LPAs have obligations under the Public Sector Equality Duty (PSED) in the Equalities Act 2010 to consider the effects of their policies and decision on people sharing particular protected characteristics.</p>	ACCEPTED: An Equalities Impact Assessment will be undertaken to accompany the plan as required by the Equalities duty.
LPS 15	Bacton & Edingthorpe Parish Council	N/a	Comment	<p>The Parish Council is keen to promote both affordable and private development in the parish to attract young families to help protect local services and facilities. The re-use of rural buildings would be welcomed.</p>	ACCEPTED: The settlement hierarchy in the existing Core Strategy (Sept 2008) will be reviewed and appropriate consideration given to provision for growth in all settlements. This will include looking at the re-use of existing buildings
					ACCEPTED: The Council is currently scoping the evidence

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Rep Ref	Respondent	Policy/ Paragraph	Nature of rep	Summary of Representation	Council Response
				<p>There is poor drainage infrastructure which should be addressed.</p> <p>The introduction of CIL would be welcomed to help Parishes.</p>	<p>required to support production of the Local Plan. The need for a Strategic Infrastructure Assessment and/or Local Infrastructure Assessment will be considered.</p> <p>ACCEPTED: There are currently no plans to adopt a CIL charging schedule.</p>
LPS 16	Gimingham Parish Council	N/a	Comment	<p>The Parish has suffered with no development in recent years. The Parish is keen to promote private development (there is enough affordable housing development and more of a balance should be struck). The reuse of rural buildings should be promoted.</p> <p>The introduction of CIL would be welcomed to help Parishes.</p>	<p>ACCEPTED: The settlement hierarchy in the existing Core Strategy (Sept 2008) will be reviewed and appropriate consideration given to provision for growth in all settlements. This will include looking at the re-use of existing buildings</p> <p>ACCEPTED: There are currently no plans to adopt a CIL charging schedule.</p>
LPS 17	Roughton Parish Council	N/a	Comment	<p>The Parish is keen to see more affordable housing in the area and to see it used for local people. The re-use of rural buildings as dwellings is welcomed.</p> <p>Concerned about the widening of Back Lane as a result of current allocation ROU03.</p> <p>The introduction of CIL would be welcomed to help Parishes.</p>	<p>ACCEPTED: The settlement hierarchy in the existing Core Strategy (Sept 2008) will be reviewed and appropriate consideration given to provision for growth in all settlements. This will include looking at the re-use of existing buildings.</p> <p>NOT ACCEPTED: The part-widening of Back Lane was agreed under the planning application for this allocated site.</p> <p>ACCEPTED: There are currently no plans to adopt a CIL charging schedule.</p>
LPS 18	Southrepps Parish Council	Para 1.3	Objection	<p>There is a need to ensure that with development come facilities. New development should be located in larger towns where infrastructure exists to cope with increased demand.</p> <p>The concept of service villages is flawed as some</p>	<p>ACCEPTED: The Council is currently scoping the evidence required to support production of the Local Plan. It is likely that a Strategic Infrastructure Assessment will be prepared under the Duty to Cooperate and a Local Infrastructure Assessment will be required.</p>

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LPS 19	Witton and Ridlington Parish Council	N/a	Comment	<p>villages have been denied development as a result. This means that smaller villages have suffered with an "aged" population. The re-use of rural buildings should be considered.</p> <p>The introduction of CIL would be welcomed to help Parishes.</p> <p>Southrepps Parish Council Objects to being included as a service village in any new plan.</p>	<p>ACCEPTED: The settlement hierarchy in the existing Core Strategy (Sept 2008) will be reviewed and appropriate consideration given to provision for growth in all settlements. This will include looking at the re-use of existing buildings.</p> <p>ACCEPTED: There are currently no plans to adopt a CIL charging schedule.</p> <p>ACCEPTED: The Parish Council's objection is noted. The settlement hierarchy in the existing Core Strategy (Sept 2008) will be reviewed and appropriate consideration given to provision for growth in all settlements. This will include looking at the re-use of existing buildings.</p>
LPS 20	Norfolk County Council, Community and Environmental Services	N/a	Comment	<p>The Parish Council has no wish to accommodate new housing within its boundary due to a lack of facilities and infrastructure.</p> <p>The Reg 18 document should contain an infrastructure delivery chapter outlining the policies to be included in the emerging local plan to identify what infrastructure is required and how it will be funded.</p>	<p>NOTED</p> <p>ACCEPTED: The Council is currently scoping the evidence required to support production of the Local Plan. It is likely that a Strategic Infrastructure Assessment will be prepared under the Duty to Cooperate and a Local Infrastructure Assessment will be required.</p>
LPS 21	Natural England	N/a	Comment	<p>Issues and opportunities for the natural environment should be addressed with particular emphasis on designated environmental assets. A strategic approach should be taken with regard to protection and enhancement of the natural environment with the aim of achieving a net gain in biodiversity. Should be based on up to date evidence.</p> <p>The impact of all topic areas on the Area of Outstanding Natural Beauty (AONB) should be</p>	<p>ACCEPTED: The Council is aware of the requirements of the Conservation of Habitats and Species regulations (2010) and will carry out the appropriate assessments and screening as required. We would welcome discussion with Natural England on this. Under the Duty to Cooperate evidence on infrastructure, including green infrastructure is to be prepared to facilitate plan-making. All proposed development sites and all policies will be assessed against sustainability criteria to ensure that development is directed to the most appropriate</p>

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				<p>considered. The AONB is a strategic matter omitted from para 2.2. Consideration of the AONB should also take into account the impacts of development on its setting.</p> <p>There are a number of environmental considerations which should be considered when allocating sites for development:</p> <ul style="list-style-type: none"> ● AONB; ● Heritage Coast; ● Locally and regionally designated sites for geodiversity and biodiversity; ● Landscape character; ● UK BAP habitats and protected species; ● Sites with opportunities for biodiversity gain; ● Ancient woodland, and; ● Access to greenspace. <p>NNDC will need to carry out a screening assessment under the Conservation of Habitats and Species regulations (2010).</p>	<p>locations. The Sustainability Appraisal (SA) will include criteria to assess economic, social and environmental factors, and is likely to look at location within, or adjacent to, the AONB.</p>
LPS 22	Breckland District Council	N/a	Comment	No comments at this time.	NOTED
LPS 23	Norfolk Coast Partnership	N/a	Comment	<p>Many challenges facing the district including managing and adapting to coastal change and climate change, maintaining environmental quality and balancing this with the need for housing and economic growth, and achieving truly sustainable built development.</p> <p>The local plan must consider the need to pursue the conservation and enhancement of the AONB and the</p>	<p>NOTED</p> <p>ACCEPTED: All proposed development sites and all policies will be assessed against sustainability criteria to ensure that development is directed to the most appropriate locations. The Sustainability Appraisal (SA) will include criteria to assess economic, social and environmental factors, and is likely to look at location within, or adjacent to, the AONB.</p>

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				<p>implications of accommodating growth within it and in settlements adjacent to it. This should be reflected in the town strategies. Within the AONB economic development and employment growth should not override the requirement to protect and enhance the scenic beauty of the natural environment. How the objectively assessed need for housing and economic needs are met, specifically within the AONB, should be considered. The implications of meeting housing needs in the AONB, and national and international designated sites should be considered when determining where development should go.</p> <p>The replacement dwellings policy needs consideration.</p> <p>There may be a need for a policy covering NPPF paragraph 55 dwellings.</p> <p>Conservation and enhancement of the natural and historic environment should have a high profile in the new plan. Consideration of the roll-back of settlements, if necessary into the AONB, whilst maintaining the character and environmental quality should be included.</p> <p>When monitoring, an assessment of whether development has contributed positively or otherwise to the new vision for the district could be included.</p>	<p>ACCEPTED: The Council will be considering policy options with regard to replacement dwellings.</p> <p>ACCEPTED: The NPPF makes clear that policies in National policy shouldn't be repeated in local plans. The Council will consider whether any additional direction is needed in the local plan with regard to paragraph 55 dwellings.</p> <p>ACCEPTED: The need to address coastal erosion and resulting roll-back of existing uses and communities will be considered when developing policy options. The Council acknowledges that in areas such as the AONB further consideration should be given to the potential impact on the natural and historic environment.</p> <p>ACCEPTED: The Council will consider appropriate monitoring indicators alongside development of policies.</p>
LPS 24	Duchy of Cornwall	N/a	Comment	No specific comments at this stage.	NOTED
LPS 25	Holkham Estate	N/a	Comment	The district faces many challenges including providing enough homes to meet objectively assessed need	NOTED ACCEPTED: A Strategic Housing Market Assessment (SHMA)

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LPS 26	Private individual	N/a	Comment	<p>(OAN) in appropriate and sustainable locations which ensuring the area's natural environmental qualities are protected.</p> <p>The vision in the Core Strategy remains valid although the amount of development to be accommodated is as yet unknown. The Council should consider the role of smaller settlements and not preserve the current hierarchy in aspic. Village and hamlets can also grow where local communities see the merits of controlled local development and the plan framework should be flexible enough to achieve this. The OAN needs should reflect the market housing area (which may not be the same as the local authority boundary).</p> <p>Consideration of housing for estate workers should be made, potentially in isolated locations.</p> <p>The programme for preparation of the Local Plan appears lengthy. Appropriate resources should be made available to ensure an up to date policy framework, especially given increasing scrutiny of land supply.</p>	<p>is currently being prepared to establish objectively assessed need (OAN) for market and affordable housing across the district. This document is nearing publication. Following publication, discussions will be had with neighbouring authorities about the distribution of housing across the housing market area (HMA) and appropriate member endorsement sought. The settlement hierarchy in the existing Core Strategy (Sept 2008) will be reviewed and appropriate consideration given to provision for growth in all settlements. Approaches to development of all types of dwellings including re-use of existing buildings in rural locations and new dwellings will be considered.</p> <p>ACCEPTED: At time of publication of the Local Development Scheme (LDS) a cautious approach was taken regarding the completion of the regulatory stages of plan-making. The Council will review this document annually and where possible will ensure that production of the new plan is expedited as swiftly as possible.</p>
				<p>It is important that enough affordable homes are made available to rent and to buy.</p> <p>Maintain historic buildings and sites.</p> <p>Employment must support new houses. Employment seems to be focused around Fakenham and North Walsham but more is needed in places like Holt.</p> <p>Good public transport links are required.</p>	<p>ACCEPTED: A Strategic Housing Market Assessment (SHMA) is currently being prepared to establish objectively assessed need (OAN) for market and affordable housing across the district.</p> <p>ACCEPTED: The Council acknowledges the NPPF requirements with regard to the historic environment. We will consider the need for a specific policy on the Historic Environment when developing policy options.</p> <p>ACCEPTED: A 'Business Growth and Investment Opportunities</p>

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					<p>Study' has been commissioned by NNDC and is currently at draft stage. The document considers the needs of existing businesses within the district, establishes land availability for expansion of existing businesses and seeks to ascertain opportunities for growth and investment.</p> <p>ACCEPTED: The adequacy of the highway network to support future levels of growth will be considered alongside policy development and consideration of sites for development.</p>
LPS 27	Sport England	N/a	Objection	<p>The emerging Local plan should cover the protection of and provision of indoor and outdoor facilities for sport and recreation, including playing fields, artificial pitches, green courts, sports halls, swimming pools and indoor/outdoor bowls. Sports provision plays an important role in the local area, be that for local residents or for visitors to the area.</p>	<p>ACCEPTED: The 'North Norfolk District Indoor Leisure Facilities Strategy' has been commissioned by NNDC regarding the provision of indoor facilities within the district which will be used to inform the development of policy.</p>
LPS 28	Brown and Co	N/a	Comments	<p>The survival of many settlements is dependent upon an appropriate scale of growth. The current policies are too restrictive and have prevented a range of sites coming forward. All settlements have a role to play in bringing forward growth in an appropriate manner.</p> <p>The new Local Plan needs to address any shortfall in housing delivery and should be aware of the needs of the wider area through preparation of a SHMA.</p> <p>Coastal Erosion policies need reviewing. Measures need to be put in place to clearly identify how this issue is to be addressed.</p> <p>Appropriate uses must be attracted to key selected settlements to ensure their economic vitality and viability.</p>	<p>ACCEPTED: The settlement hierarchy in the existing Core Strategy (Sept 2008) will be reviewed and appropriate consideration given to provision for growth in all settlements</p> <p>ACCEPTED: A Strategic Housing Market Assessment (SHMA) is currently being prepared to establish objectively assessed need (OAN) for market and affordable housing across the district. This document is nearing publication. Following publication, discussions will be had with neighbouring authorities about the distribution of housing across the housing market area (HMA) and appropriate member endorsement sought.</p> <p>ACCEPTED: The Council is likely to publish a Strategic Flood Risk Assessment to provide evidence on flood risk throughout the district. This evidence document, alongside other strategies</p>

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LPS 29	Wells-Next-The-Sea Town Council	N/a	Comment	<p>A clear review mechanism needs to be put in place to ensure any future plan is achieving its set aims and objectives.</p> <p>There must be a balance struck between increased tourism and the needs of the resident population. Building new homes only for them to become second homes, holiday homes or B&Bs is of no benefit.</p> <p>Any additional allocation of dwellings beyond those in the 2021 plan will be difficult to sustain without significant improvements in infrastructure and facilities.</p> <p>There should be a degree of flexibility in all policies and the views of the community should be fully considered.</p>	<p>such as the Coastline Management Plan would help inform any future policies on climate change and flood risk and coastal erosion.</p> <p>ACCEPTED: The Council is currently scoping the evidence required to support production of the Local Plan. The need for a Retail Study will be considered.</p> <p>ACCEPTED: The Council will consider appropriate monitoring indicators alongside development of policies.</p> <p>ACCEPTED: The Council is currently scoping the evidence required to support production of the Local Plan. The need for a Tourism Study will be considered. The use of dwellings as second homes and holiday homes does not fall under planning control.</p> <p>ACCEPTED: The Council is currently scoping the evidence required to support production of the Local Plan. It is likely that a Strategic Infrastructure Assessment will be prepared under the Duty to Cooperate and a Local Infrastructure Assessment will be required.</p> <p>ACCEPTED: The NPPF requires that policies are made flexible so that they can respond to changing market conditions. The Council recently consulted on a draft Statement of Community Involvement (SCI) which sets out how we intend to consult with all stakeholders during plan-making and on planning applications.</p>
LPS 30	Private individual	N/a	Comments	<p>Measures should be taken to ensure adequate and sufficient footpaths and footway systems are in place for communities. Measures should be taken to ensure that traffic and roadways are improved and amended</p>	<p>ACCEPTED: The adequacy of the highway network to support future levels of growth will be considered alongside policy development and consideration of sites for development.</p>

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LPS31	Neatishead Parish Council	N/a	Comment	<p>so that they do not have a detrimental impact on communities. Measures should be taken to reinstate plans for the Cromer Bypass.</p> <p>Provision of affordable housing in rural areas is an area of challenge which needs addressing.</p> <p>Transparency and consistency in decision making should support implementation.</p> <p>Transport should be included in the strategic areas to be considered.</p>	<p>ACCEPTED: The settlement hierarchy in the existing Core Strategy (Sept 2008) will be reviewed and appropriate consideration given to provision for growth in all settlements.</p> <p>ACCEPTED: The Council will publish a consultation statement at each regulatory stage of consultation in plan-making so that the representations received and the Council's response can be clearly understood.</p> <p>ACCEPTED: The adequacy of the highway network to support future levels of growth will be considered alongside policy development and consideration of sites for development.</p>
LPS 32	Pigeon Land Ltd (Represented by Bidwells)	N/a	Comment	<p>There is a need to identify a sufficient number of sustainable sites for residential development in appropriate locations, in order to meet objectively assessed need for both market and affordable housing.</p>	<p>ACCEPTED: A Strategic Housing Market Assessment (SHMA) is currently being prepared to establish objectively assessed need (OAN) for market and affordable housing across the district. This document is nearing publication. Following publication, discussions will be had with neighbouring authorities about the distribution of housing across the housing market area (HMA) and appropriate member endorsement sought. The settlement hierarchy in the existing Core Strategy (Sept 2008) will be reviewed and appropriate consideration given to provision for growth in all settlements.</p>
LPS 33	Persimmon Homes	N/a	Comment	<p>The amount of housing growth should be identified through a SHMA and distribution of growth should be considered in a sustainable fashion, albeit accepting that some smaller settlements need proportionate growth to sustain services. The provision of infrastructure and affordable housing needs should be considered against the viability/deliverability of housing.</p>	<p>ACCEPTED: A Strategic Housing Market Assessment (SHMA) is currently being prepared to establish objectively assessed need (OAN) for market and affordable housing across the district. This document is nearing publication. Following publication, discussions will be had with neighbouring authorities about the distribution of housing across the housing market area (HMA) and appropriate member endorsement</p>

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				<p>The announcement by Government about 200,000 starter homes will add further pressure to identify suitable housing land in the district.</p> <p>An infrastructure capacity and environmental study should support the review of the local plan to ensure opportunities and constraints are identified at the outset. This should establish the potential sustainability of a settlement.</p> <p>Given the lengthy process before projected adoption there should be no delays to ensure there is an up-to-date policy framework, and subsequent scrutiny of the Councils land supply position.</p>	<p>sought. The settlement hierarchy in the existing Core Strategy (Sept 2008) will be reviewed and appropriate consideration given to provision for growth in all settlements</p> <p>ACCEPTED: The Council is currently scoping the evidence required to support production of the Local Plan. It is likely that a Strategic Infrastructure Assessment will be prepared under the Duty to Cooperate and a Local Infrastructure Assessment will be required. In addition, all policy options and sites will be considered against sustainability criteria, including consideration of environmental constraints.</p> <p>ACCEPTED: At time of publication of the Local Development Scheme (LDS) a cautious approach was taken regarding the completion of the regulatory stages of plan-making. The Council will review this document annually and where possible will ensure that production of the new plan is expedited as swiftly as possible.</p>
LPS 34	Anglian Water	N/a	Comment	The Council may wish to consider commissioning a Water Cycle Study	ACCEPTED: The Council is currently scoping the evidence required to support production of the Local Plan. The need for a Water Cycle Study will be considered.
LPS 35	Community Action Norfolk (CAN)	N/a	Comment	Travel planning should be included alongside an ambition to use opportunities to design in better health, social and safety outcomes. Community cohesion is part of sustainable development.	ACCEPTED: We will be reviewing our transport policies and considering how we can best achieve sustainable transport. In addition we will also be reviewing developer contributions from development and when/how we can secure travel plans to promote more sustainable methods of transport.
LPS 36	National Grid (Represented by Amec)	N/a	Comment	No comments to make at this stage.	NOTED
LPS 37	Anglia Maltings (Holding) Ltd	N/a	Comment	North Norfolk has too narrow an economic base and the range of businesses, their scale and their capacity to generate high quality employment identified in the	ACCEPTED: A 'Business Growth and Investment Opportunities Study' has been commissioned by NNDC and is currently at draft stage. The document considers the needs of existing

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				<p>current plan will not deliver the jobs target (4,000 jobs by 2021). The creative economy (manufacturing, design and marketing) should be explored and the needs of existing businesses to expand and deliver added value should be explored. The local plan should encourage inward investment and encourage existing businesses to expand and develop.</p> <p>Greater economic activity needs supporting in villages and settlements outside the identified principle settlements and there are omissions from the current service villages (Foulsham and Great Ryburgh in particular) which should be included given the strong employment base they provide and local services offered.</p> <p>Opportunities exist for the expansion of wind power generation and there are greater opportunities for solar arrays. Substantial amounts of bi-product arise from existing food manufacturing which could be converted to renewable energy (e.g. anaerobic digestion). Combined heat and power (CHP) should be considered.</p> <p>Existing settlements with local facilities should plan for limited additional housing growth, possibly in the form of mixed use development to support those existing services.</p> <p>Solutions need to be found to ensure young people stay in the district.</p> <p>Great Ryburgh should be a service village.</p> <p>Economic focus of the local plan should be measured by achievement of the following:</p>	<p>businesses within the district, establishes land availability for expansion of existing businesses and seeks to ascertain opportunities for growth and investment. Once published this evidence document will be used to guide policy development.</p> <p>ACCEPTED: The current local plan allows for employment development outside of principle settlements. The settlement hierarchy will be re-visited in development of new policies and appropriate consideration given to provision for growth in all settlements.</p> <p>ACCEPTED: Consideration will be given to how we can promote renewable technologies in policy development.</p> <p>ACCEPTED: The settlement hierarchy in the existing Core Strategy (Sept 2008) will be reviewed and appropriate consideration given to provision for growth in all settlements.</p> <p>ACCEPTED: The Council will explore the options available within the scope of plan-making.</p> <p>ACCEPTED: The settlement hierarchy in the existing Core Strategy (Sept 2008) will be reviewed and appropriate consideration given to provision for growth in all settlements.</p> <p>ACCEPTED: The Council will consider appropriate monitoring indicators alongside development of policies.</p>

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LPS 38	Thorpe Market Parish Council	N/a	Comment	<ol style="list-style-type: none"> 1. Diversification of jobs 2. Number of companies headquartered in North Norfolk 3. Number of jobs based on intellectual property development 4. Measuring value added to agricultural production including export value. <p>Thorpe Market Parish Council would not be opposed to limited development provide that appropriate amenities were also included. A small scale scheme would save the village from further morbidity. The existing restriction on housing could be replaced with a case-by-case review of planning applications, particularly for a small exception scheme for new affordable homes.</p> <p>The B1159 cost road is at risk if the coastline between Overstrand and Mundesley is not to be protected. This is of vital importance to the tourist economy.</p> <p>The local plan should consider provision of broadband and mobile phone networks.</p> <p>The local plan should devote some attention to facilities and the welfare of the elderly.</p>	<p>ACCEPTED: The settlement hierarchy in the existing Core Strategy (Sept 2008) will be reviewed and appropriate consideration given to provision for growth in all settlements.</p> <p>ACCEPTED: The Council is currently scoping the evidence required to support production of the Local Plan. The need for a Strategic Flood Risk Assessment will be considered. If produced, this evidence, alongside other strategies such as the Coastline Management Plan would help inform any future policies on climate change, flood risk and coastal erosion and potential roll-back sites.</p> <p>ACCEPTED: The Council acknowledges the NPPF requirement to include a telecommunications policy in the Local Plan.</p> <p>ACCEPTED: A Strategic Housing Market Assessment (SHMA) is currently being prepared to establish objectively assessed need (OAN) for market and affordable housing across the district. This document is nearing publication. This document includes evidence of the needs of the elderly. Any future policies will seek to address this need.</p>
LPS 39	Amstel Group Corporation (Represented by Indigo Planning)	N/a	Comment	<p>The scope and subject matter of the new Local Plan appears to be appropriate.</p>	<p>NOTED</p> <p>ACCEPTED: A Strategic Housing Market Assessment (SHMA) is currently being prepared to establish objectively assessed</p>

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				<p>We welcome investigations into better understanding the districts objectively assessed need (OAN) for market and affordable housing.</p> <p>We would also welcome a review of the district overall spatial strategy.</p>	<p>need (OAN) for market and affordable housing across the district. This document is nearing publication. Following publication, discussions will be had with neighbouring authorities about the distribution of housing across the housing market area (HMA) and appropriate member endorsement sought.</p> <p>ACCEPTED: The new Local Plan will include a revised spatial strategy for the District.</p>
LPS 40	Blue Sky leisure (Represented by Bidwells)		Comment	<p>Coastal erosion has not been included. This is a key issue which needs to be addressed. The rate of coastal erosion, and its impact on land uses, including tourism, means it will become ever more important over time. The Council must consider its approach to 'roll-back'. It may be appropriate for the Council to identify alternative sites and locations for residential, commercial and tourism uses which will require relocation as a direct result of coastal erosion and coastal flooding. A 'roll-back' policy should be put in place.</p>	<p>ACCEPTED: Reference to review of current coastal erosion policies is made in the Reg 18 document. The Council will consider the options for any future policy on roll-back or relocation of existing uses as a result of coastal flooding and erosion. Any new policy will be subject to sustainability appraisal.</p>
LPS 41	Private individual	N/a	Comment	<p>Aldborough no longer has the facilities to be a service village.</p> <p>Greater emphasis should be placed on safety of pedestrians when proposing future development.</p> <p>When proposing new development consideration should be given to the hamlets as well as the villages. Spreading development will achieve the same ends with a lower impact.</p> <p>Conservation areas should be sacrosanct.</p> <p>Corporate stakeholders who indicate their facilities</p>	<p>ACCEPTED: The settlement hierarchy in the existing Core Strategy (Sept 2008) will be reviewed and appropriate consideration given to provision for growth in all settlements.</p> <p>ACCEPTED: During consideration of sites the proximity of local services and access to those services will be considered. The Sustainability criteria are currently being worked up, against which all proposed development sites will be assessed.</p> <p>ACCEPTED: The settlement hierarchy in the existing Core Strategy (Sept 2008) will be reviewed and appropriate consideration given to provision for growth in all settlements</p>

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Rep Ref	Respondent	Policy/ Paragraph	Nature of rep	Summary of Representation	Council Response
LPS 42	Taylor Wimpey Strategic Land (Represented by Carter Jonas)	2.1	Comment	<p>can cope with new development should be required to publish the basis on which they make their statements and give existing occupiers the chance to reciprocate.</p> <p>From the outset of consultation on the last local plan there seemed to be a determination to locate as much development on sites NOT favoured by local opinion Planners must consider parish council's views.</p>	<p>ACCEPTED: The types of development considered acceptable in conservation areas will be considered during policy development.</p> <p>ACCEPTED: The Council is currently scoping the evidence required to support production of the Local Plan. The need for a Strategic Infrastructure Assessment and/or Local Infrastructure Assessment will be considered.</p> <p>ACCEPTED: The Council recently consulted on a draft Statement of Community Involvement (SCI) which sets out how we intend to consult with all stakeholders during plan-making and on planning applications. We are committed to engaging fully with our communities and will consider all representations made.</p>
				<p>NNDC should not be carrying forward any form of restraint in terms of development. The NPPF establishes a presumption in favour of sustainable development and NNDC should therefore challenge itself to fully meet objectively assessed need (OAN) once defined.</p> <p>An appraisal of North Norfolk should be carried out to assess the unique qualities and aspects of the area.</p> <p>Reference should be made to preparation of a SHMA.</p> <p>There should be consultation with the LEP during preparation of any evidence on employment and economic development.</p> <p>Under the Duty to Cooperate, NNDC should work closely with County Highways to ensure there is a cohesive development strategy.</p>	<p>ACCEPTED: A Strategic Housing Market Assessment (SHMA) is currently being prepared to establish objectively assessed need (OAN) for market and affordable housing across the district. This document is nearing publication. Following publication, discussions will be had with neighbouring authorities about the distribution of housing across the housing market area (HMA) and appropriate member endorsement sought. The settlement hierarchy in the existing Core Strategy (Sept 2008) will be reviewed and appropriate consideration given to provision for growth in all settlements.</p> <p>ACCEPTED: Work is underway to prepare a Sustainability Appraisal Scoping Report on which we will engage local communities and other stakeholders as necessary. This will inform the sustainability criteria against which all policy and site options will be assessed.</p> <p>NOT ACCEPTED: The Regulation 18 document is not considered the right place to make reference to evidence documents. A Strategic Housing Market Assessment (SHMA)</p>

C Stage 1a Consultation Summaries

Rep Ref	Respondent	Policy/ Paragraph	Nature of rep	Summary of Representation	Council Response
				<p>An update on progress of CIL adoption would be welcomed.</p> <p>The LDS should set out the documents proposed to be prepared as evidence, including a timetable for their commissioning and publication.</p>	<p>is currently being prepared to establish objectively assessed need (OAN) for market and affordable housing across the district. This document is nearing publication.</p> <p>ACCEPTED: Any evidence produced on employment and economic development will be prepared in consultation with the LEP.</p> <p>ACCEPTED: The Council is currently scoping the evidence required to support production of the Local Plan. The need for a Strategic Infrastructure Assessment and/or Local Infrastructure Assessment will be considered.</p> <p>ACCEPTED: There are currently no plans to adopt a CIL charging schedule.</p> <p>ACCEPTED: A timetable for evidence preparation will be included in the next publication of the Local Development Scheme (LDS).</p>
LPS 43	Fakenham Town Council	N/a	Comment	A map was provided with potential development sites identified.	<p>NOTED: The Council is preparing to publish a 'call for sites' towards the end of 2015. At that time, Fakenham Town Council will be invited to submit these sites for consideration.</p>
LPS 44	CPRE Norfolk	N/a	Comment	<p>There must be a determined effort to protect and conserve the natural environment and wider countryside. We owe this to future generations and our natural environment is key to our local economy.</p> <p>Existing Core Strategies have stood up well. EN8 and EN9. We would like to see water resource added.</p> <p>There should be a clear and quantifiable assessment of housing needs, including affordable housing. The SHMA may arrive at an overly high number which</p>	<p>NOTED</p> <p>NOTED</p> <p>ACCEPTED: A Strategic Housing Market Assessment (SHMA) is currently being prepared to establish objectively assessed need (OAN) for market and affordable housing across the district. This document is nearing publication.</p> <p>ACCEPTED: The Council is currently scoping the evidence required to support production of the Local Plan. It is likely that</p>

Stage 1a Consultation Summaries C

Rep Ref	Respondent	Policy/ Paragraph	Nature of rep	Summary of Representation	Council Response
				<p>will be justified as the basis for achieving affordable housing targets. 45% affordable housing target is unrealistic. AONB boundaries are being impacted by housing allocations which will become a more acute issue in this coming review. Provision of occupational buildings in the countryside should be reserved only for those who require this for their occupation.</p> <p>Demands on infrastructure need serious consideration.</p> <p>Higher skilled jobs would be welcomed. Changes in shopping patterns and continuing trends for internet shopping will impact on market towns and our High Streets.</p> <p>There will be major impacts as a result of transport works in the wider district (e.g. dualling of A11 and A47, and NDR) – numbers of day visitors will increase and further pressures from London for second homes. Impact of this on our road networks and natural environment needs consideration.</p>	<p>a Strategic Infrastructure Assessment will be prepared under the Duty to Cooperate and a Local Infrastructure Assessment will be required.</p> <p>ACCEPTED: The Council is currently scoping the evidence required to support production of the Local Plan. The need for a Retail Study will be considered. Any new policy on uses within town centres will be flexible and will reflect current permitted development rights for change of use.</p> <p>ACCEPTED: The adequacy of the highway network will be considered alongside policy development and consideration of sites for development. The impact of wider strategic changes to the transport network will also be considered.</p>
LPS 45	Thursford Parish Council	N/a	Comment	We wish to raise concern about the need for affordable homes for local people in parishes where more than half the houses are holiday or second homes.	ACCEPTED: The settlement hierarchy in the existing Core Strategy (Sept 2008) will be reviewed and appropriate consideration given to provision for growth in all settlements. The use of dwellings as second homes and holiday homes does not fall under planning control.
LPS 46	Private individual	N/a	Comment	<p>Many challenges facing the district including;</p> <ul style="list-style-type: none"> Meeting housing need Preserving the countryside Balancing the needs of the countryside against industry, tourism and infrastructure. 	<p>NOTED.</p> <p>ACCEPTED: There is a clear Government drive to reuse brownfield land. The Council is preparing to publish a 'call for sites' towards the end of 2015. At that time sites can be put forward for consideration of their development potential.</p>

C Stage 1a Consultation Summaries

Rep Ref	Respondent	Policy/ Paragraph	Nature of rep	Summary of Representation	Council Response
LPS 47	Holt Community Primary School (Represented by Governor and Vice Chair)	N/a	Comment	<ul style="list-style-type: none"> Need to retain young people in the district Finding space for outdoor leisure activities <p>Before releasing new land, existing small sites should be considered so as to preserve agricultural land.</p> <p>A good mix of housing is needed with easy access to facilities etc. Insulation and energy solutions should be integral.</p> <p>Any development needs to protect our AONB, historic sites and wildlife.</p> <p>Tourism is needed but we must avoid winter 'ghost towns'.</p> <p>Solutions need to be found to ensure young people stay in the district.</p> <p>Adequate parking must be integral to all new development.</p> <p>Public transport must be addressed to encourage a move away from our current car culture. Cycle paths to link our open and green recreational areas are essential.</p> <p>There should be on-going monitoring and there should be close scrutiny.</p> <p>A new school must be well planned and able to cater for all Holt children. Education provision should be included in the local plan and how we can address current constraints to provision. A new site on Lodge</p>	<p>ACCEPTED: A Strategic Housing Market Assessment (SHMA) is currently being prepared to establish objectively assessed need (OAN) for market and affordable housing across the district. Energy requirements for new dwellings have recently been made part of Building Regulations so all new development will have to meet certain criteria.</p> <p>ACCEPTED: All proposed development sites and all policies will be assessed against sustainability criteria to ensure that development is directed to the most appropriate locations. The Sustainability Appraisal (SA) will include criteria to assess economic, social and environmental factors, and is likely to look at location within, or adjacent to, the AONB.</p> <p>ACCEPTED: The Council is currently scoping the evidence required to support production of the Local Plan. The need for a Tourism Study will be considered.</p> <p>ACCEPTED: The Council will explore the options available within the scope of plan-making.</p> <p>ACCEPTED: We will be reviewing our transport policies and considering how we can best promote sustainable transport modes.</p> <p>ACCEPTED: The Council will consider appropriate monitoring indicators alongside development of policies.</p> <p>ACCEPTED: The Council is currently scoping the evidence required to support production of the Local Plan. It is likely that a Strategic Infrastructure Assessment will be prepared under the Duty to Cooperate and a Local Infrastructure Assessment will be required. These will cover education provision and local community facilities.</p>

Stage 1a Consultation Summaries C

Rep Ref	Respondent	Policy/ Paragraph	Nature of rep	Summary of Representation	Council Response
LPS 48	District Councillor, Town Councillor and Private individual, Holt	N/a	Comment	<p>Close would provide the benefit of being adjacent to the Country Park. A new larger school would boost employment.</p> <p>Opportunities for a community hub.</p> <p>Housing should provide the right mix.</p> <p>Affordable housing should be built to a high quality. More 2 bed housing is needed.</p> <p>Holt must remain a Principle Settlement.</p> <p>A new site is needed for a primary school with adequate parking, playgrounds, classroom sizes, sports provision etc. A new school will bring employment.</p> <p>Hold medical centre needs appropriate provision.</p> <p>Opportunities for a community hub.</p> <p>Infrastructure to meet housing needs should be provided.</p>	<p>ACCEPTED: A Strategic Housing Market Assessment (SHMA) is currently being prepared to establish objectively assessed need (OAN) for market and affordable housing across the district.</p> <p>ACCEPTED: A Strategic Housing Market Assessment (SHMA) is currently being prepared to establish objectively assessed need (OAN) for market and affordable housing across the district.</p> <p>ACCEPTED: The Council is currently scoping the evidence required to support production of the Local Plan. It is likely that a Strategic Infrastructure Assessment will be prepared under the Duty to Cooperate and a Local Infrastructure Assessment will be required. These will cover education provision and local community facilities.</p>
LPS 49	Holt Town Council	N/a	Comment	<p>We must ensure that we get the right housing in the right place, including the right mix of affordable and market homes and the right sizes.</p> <p>Holt should continue as a principle settlement and provide employment for Sheringham and Cromer. More industrial land would be welcomed, not just allocated but fulfilling its purpose.</p>	<p>ACCEPTED: A Strategic Housing Market Assessment (SHMA) is currently being prepared to establish objectively assessed need (OAN) for market and affordable housing across the district.</p> <p>ACCEPTED: A 'Business Growth and Investment Opportunities Study' has been commissioned by NNDC and is currently at draft stage. The document considers the needs of existing</p>

C Stage 1a Consultation Summaries

Rep Ref	Respondent	Policy/ Paragraph	Nature of rep	Summary of Representation	Council Response
				<p>The need for a school must be addressed.</p> <p>Car parking issues must be addressed.</p>	<p>businesses within the district, establishes land availability for expansion of existing businesses and seeks to ascertain opportunities for growth and investment.</p> <p>ACCEPTED: The Council is currently scoping the evidence required to support production of the Local Plan. It is likely that a Strategic Infrastructure Assessment will be prepared under the Duty to Cooperate and a Local Infrastructure Assessment will be required. These will cover education provision and local community facilities.</p>
LPS 50	Holt Primary School	N/a	Comment	<p>Challenges facing the district include a lack of parking, the need for a supermarket and a larger school.</p> <p>We need an increased range of high street shops.</p> <p>More affordable housing for first time buyers.</p>	<p>ACCEPTED: The Council is currently scoping the evidence required to support production of the Local Plan. It is likely that a Strategic Infrastructure Assessment will be prepared under the Duty to Cooperate and a Local Infrastructure Assessment will be required. These will cover education provision and local community facilities.</p>
LPS51	Sheringham Chamber of Trade	N/a	Comment	<p>Please add traffic management to the subjects to be included in the Local Plan</p>	<p>ACCEPTED: The adequacy of the highway network will be considered alongside policy development and consideration of sites for development.</p>
LPS52	Renewable Energy Systems Limited	N/a	Comment	<p>Amended planning guidance places increased importance on the identification of sites suitable for wind energy. We would like to meet with you to discuss potential sites in more detail and work in partnership with you on this issue.</p>	<p>ACCEPTED: The Council is aware of the new requirements from Government guidance and is currently scoping the evidence required to support production of the Local Plan, including consideration of sites for on-shore renewable energy.</p>
LPS53	Edgefield Parish Council	N/a	Comment	<p>Planning Laws should be relaxed and more power given to parish councils.</p> <p>Small scale development should be allowed in villages.</p>	<p>ACCEPTED: The Government have introduced a number of changes to planning legislation to relax the requirements for permission. Devolution is also on the Governments agenda and may involve devolving power down to local authorities. It is unclear at this time if powers would be given to town and parish councils.</p>

Stage 1a Consultation Summaries C

Rep Ref	Respondent	Policy/ Paragraph	Nature of rep	Summary of Representation	Council Response
				Better bus services in rural villages and better broadband and mobile signal.	<p>ACCEPTED: The settlement hierarchy in the existing Core Strategy (Sept 2008) will be reviewed and appropriate consideration given to provision for growth in all settlements.</p> <p>ACCEPTED: We will be reviewing our transport policies and considering how we can best promote sustainable transport modes. In addition we will also be reviewing developer contributions from development. The Council is currently scoping the evidence required to support production of the Local Plan. It is likely that a Strategic Infrastructure Assessment will be prepared under the Duty to Cooperate and a Local Infrastructure Assessment will be required. Broadband and mobile signal may be considered under this evidence.</p>

Table 32 Regulation 18: Response Form Reply Summaries

D Stage 1a Consultation Evidence

Appendix D: Stage 1a Consultation Evidence

D.1 Example Correspondence



Dear Sir/Madam,

Notification of intention to prepare a new Local Plan (Regulation 18)

We are writing to you as you are a specific or general consultee as listed in the Local Planning Regulations.

Please find a link to the first issue of the Local Plan Newsletter here: http://www.north-norfolk.gov.uk/files/Local_Plan_Newsletter.pdf. Our newsletters will be our way of letting you know what we're doing and advising you of how you can get involved.

The Council resolved to review its currently adopted planning documents including the Core Strategy, Development Management Policies and Site Allocations in November of last year. The first stage of the process of preparing a new Local Plan is to notify people of the broad subjects that are proposed to be covered by the Local Plan and give you the chance to comment on them. The Regulation 18 notification document sets these subjects out in more detail.

We would like to hear whether you think this document covers all the subjects which should be included in the new Local Plan, and any other comments that you may have.

The consultation period starts on **Monday 17th August 2015** and will run for a period of 8 weeks until **Friday 9th October 2015**.

The document can be found on our consultation portal which allows you to submit your comments electronically. Alternatively you can use the representation form on our website to respond to us via email or in the post:

- **Consultation Portal:** <http://consult.north-norfolk.gov.uk>
- **Website & Comments Form:** <http://www.north-norfolk.gov.uk/planning/21138.asp>

The newsletter also provides some useful information about other documents we are producing and details of how you can comment on them:

- the timetable for production of the new Local Plan (the Local Development Scheme (LDS)) which took effect on the 3rd August, and;
- the detail of how and when we will consult with specific consultees, groups and individuals throughout the process (the Statement of Community Involvement (SCI)). The SCI is also subject to an 8 week period of consultation from **Monday 17th August 2015** until **Friday 9th October 2015**.

If you have any queries on the above then please feel free to contact us further. Alternatively, we have scheduled a Q&A event on the **3rd September 2015** from 5:30pm to 7:30pm (parish and town councils are invited to an event from 4-6pm on **Tuesday 1 September**). Both of these events will be held at the NNDC offices, Holt Road, Cromer, where officers will be available to answer your questions. This is in addition to the two launch events detailed in the newsletter, and is aimed specifically at the specific and general consultees listed in the Regulations. If you would like to attend, please send an email to planningpolicy@north-norfolk.gov.uk with your name, organisation, contact address, email and telephone numbers, and details of how many people you wish to attend. If you have any special access requirements please also let us know. All responses must be received by no later than 21st August 2015 to ensure a place can be reserved for you.

We hope you find the first edition of the Newsletter helpful and we look forward to hearing from you soon.

Yours faithfully

Sarah Ashurst
 Planning Policy Team Leader
 01263 516318 / 516144
planningpolicy@north-norfolk.gov.uk

Figure 4 Notification of intention to prepare a new Local Plan (Regulation 18)

Stage 1a Consultation Evidence D

D.2 Launch Event Advertisement



Figure 5 A-Frame Noticeboard @ NNDC Offices in Cromer

D Stage 1a Consultation Evidence



What sort of Plan?



A single Local Plan covering the period 2016-2036 to include:

1. Strategic Policies
2. Detailed Development Management Policies
3. New development sites (allocations)
4. A revised Policies Map



How to Get Involved

- Stay in touch via the **Local Plan website**:
www.north-norfolk.gov.uk/localplan
- Sign up to our **Consultation Database** to be informed of future Local Plan consultations and to receive our quarterly newsletter
- Use our online **Consultation Portal** to respond to Local Plan consultations:
<http://consult.north-norfolk.gov.uk>



Figure 6 Example of Presentation Slides for Local Plan Launch Event

Stage 1a Consultation Evidence D

Due to a lack of demand, two of the Local Plan Launch Events were cancelled. Emails were sent to agents, developers and specific consultees to notify them of the cancellation and to provide contact details should consultees wish to discuss a particular issue in relation to the preparation of the Local Plan. A cancellation note was also posted on the NNDC website.

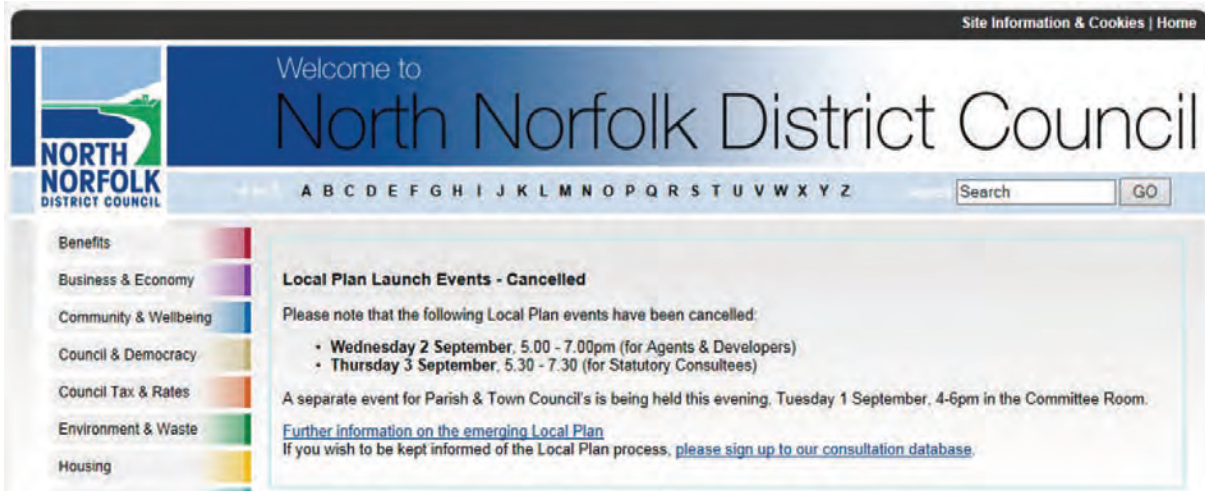


Figure 7 Launch Event Cancellation Web Notice

D.3 Example of Public Exhibition Display Boards



Figure 8 Public Exhibition Display Boards (2015)

D Stage 1a Consultation Evidence

D.4 News Release and Example Media Coverage



17 August 2015

Get involved and help shape the future of north Norfolk

People are being urged to get involved and help shape the future of North Norfolk with the development of the area's new Local Plan.

The Local Plan, which will cover the period 2016 – 2036, will set out where development will happen, allocate specific sites for housing and employment growth and set out new policies which will be used when deciding planning applications.

Clr Tom FitzPatrick, Leader of North Norfolk District Council said: "This is the start of the consultation on the Local Plan and I would urge people to get involved and help shape the future of North Norfolk."

Clr Sue Arnold, Cabinet Member for Planning added: "The Local Plan is vital to help guide development across the district and ensure that the needs and aspirations of the community are met while protecting our natural environment and heritage.

In this initial stage people are being asked to comment on two documents which outline the suggested subjects to be covered in the Local Plan and how the council intends to consult with the community.

People have from 17 August to 9 October to comment on both documents, which are available on the Council's web site; as well as being in reception at the council's offices in Cromer and Fakenham.

Clr Arnold added: "This is a long process and at the moment we're expecting it to take around three years to complete. However, central government has promised to streamline the process so we may be able to deliver the new Local Plan more quickly.

"It's important to have an up to date Local Plan in place in order to guide new developments to the right locations and decide planning applications."

People can find out more by checking the council's web site www.northnorfolk.org/localplan

For more information contact Sue Lawson, Communications and PR Manager on 01263 516344 or Louise Cowell on 01263 516059

The above press release went to a number of media contacts including:

- North Norfolk News
- Eastern Daily Press (EDP)
- Fakenham and Wells Times
- BBC Look East and BBC Online
- BBC Radio Norfolk
- KLFM

Figure 9 Get Involved and Help Shape the Future of North Norfolk News Release (17 August 2015)

Stage 1a Consultation Evidence D



Figure 10 How you can Shape the Future- Eastern Daily Press Newspaper Article (August 2015)



Figure 11 Help Shape the Blueprint for the Future, North Norfolk Newspaper (13 August 2015)

D Stage 1a Consultation Evidence



Figure 12 Get Involved, Help Shape the Future, Dereham and Fakenham Times (13 August 2015)



Figure 13 Search on to find Development Sites- Eastern Daily Press (23 October 2015)

Stage 1a Consultation Evidence D

D.5 Example Social Media Promotion



Figure 14 Local Plan Launch Twitter Tweet (17 August 2015)

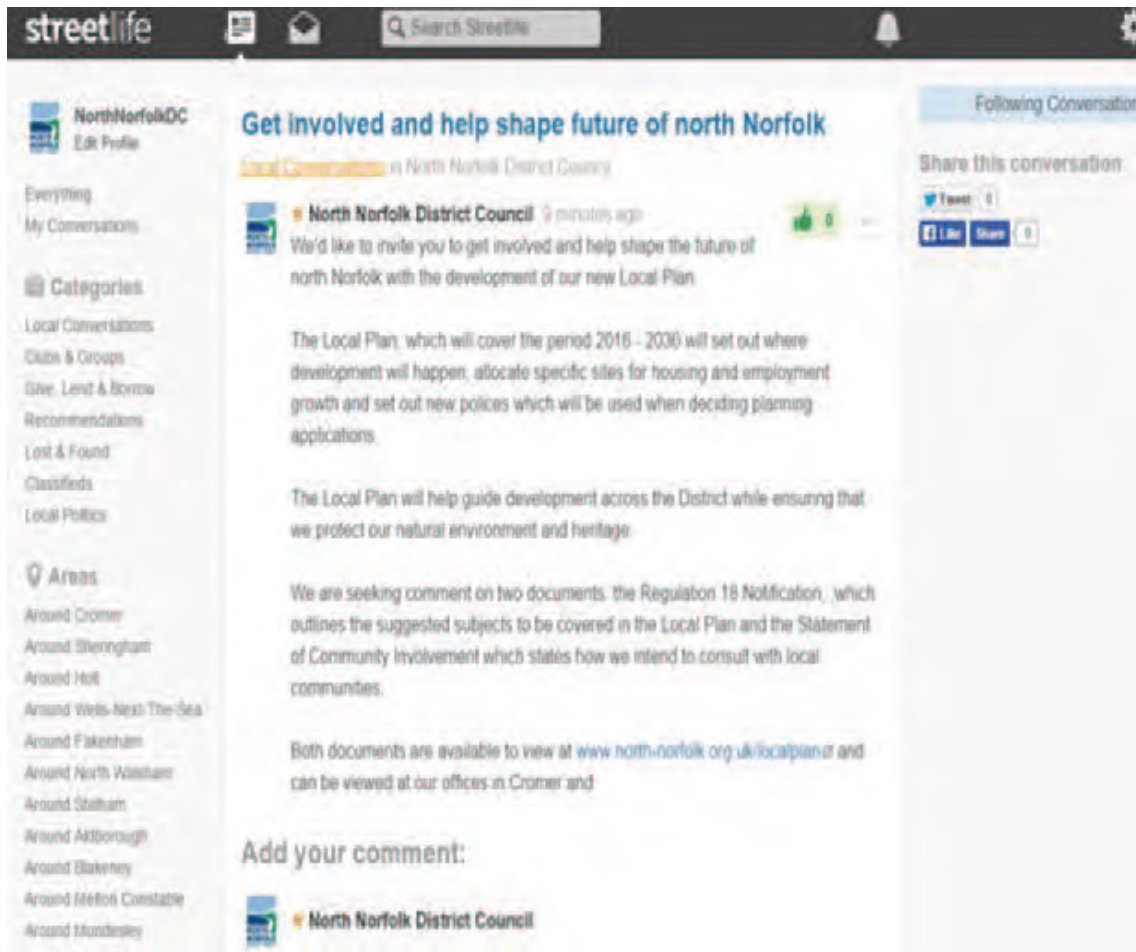


Figure 15 Get Involved and Help Shape Future of North Norfolk Streetlife Post (25 August 2015)

D Stage 1a Consultation Evidence

D.6 Website Consultation Information



Figure 16 Regulation 18 NNDC Website Consultation Information

D Stage 1a Consultation Evidence

Q5. What specific areas, in addition to those listed in the consultation document, would you like to see covered under each subject? Please add a reason for each comment.

a. Spatial and town strategies:

b. Housing:

c. Natural and historic environment:

d. Employment and economic development:

e. Community and transport:

Q6. Check the 10 year vision for North Norfolk has been developed, how do you think we can ensure that it is achieved?

Please continue on additional sheets if necessary. Number of additional sheets included:

If you would like this document in large print, audio, braille or in a different language, please contact our Planning Policy team on 01263 516318 or planningpolicy@north-norfolk.gov.uk

If you do not have access to the internet, this document can be viewed and hyperlinks followed by using the public access computers available at the Council Offices, or in local libraries.

**IN A
FRAN**

Figure 17 Regulation 18: Preparation of a Local Plan Consultation Response Form

Stage 1a Consultation Evidence D

E Stage 1b Consultation Summaries

Appendix E: Stage 1b Consultation Summaries

Schedule of Comments Received / Responses HELAA Final

Q1) Do you agree with the sources of sites listed at paragraph 2.2 of the proposed HELAA methodology?

Support: (9): Private individuals (HELAA001), (HELAA002), (HELAA003), (HELAA004), (HELAA 005), HIGHWAYS ENGLAND(HELAA006), Ipswich BC (HELAA 010), Pigeon Investments LTD (HELAA025), CBRE Ltd (HELAA015)

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Agree with the sources of sites listed at paragraph 2.2 of the proposed HELAA methodology	Supported noted	Consider Feedback support in the development of the methodology

Support in Part (4)

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Private individual (HELAA007) Include redundant local authority buildings, disused police stations, ex garage for courts (as used by hand car washes). Land acquired by supermarkets & not use or adjacent to existing supermarkets. Disused open car parks. Brownfield sites.	It is important that all relevant sources of land are identified in order to obtain a true picture of the available capacity in each district.	Consider including specific reference to Brownfield land and or brownfield register (future requirement)
Private individual (HELAA008) Include sites for one dwelling upwards so as not to exclude appropriate sites in the	Question 2 details the approach to size threshold	No change recommended

HELAA Schedule of Comments received and actions - Final June 2016

Stage 1b Consultation Summaries E

<p>country-side</p>	<p>Gladman HELAA016 Sites with Planning permission or those under construction should be considered outside the HELAA. Previously allocated sites require robust investigation to understand why they have not come forward.</p>	<p>The aim of the HELAA is to identify the amount of land available for housing and economic development in order that a capacity assessment can be made of suitable land to inform Local Plan development. It is reasonable to include those proposals that have been granted permission and existing allocations where the principle that development can occur in such a calculation.</p> <p>Persimmon Homes, Anglia (HELAA024) It is important that all relevant sources of land are identified in order to obtain a true picture of the available capacity in each district. Inclusion of Historical records is an obvious starting point however there may well be duplication through the categories identified. Previously identified sources including those identified through previous SHLAA should be used to inform the HELAA</p>	<p>Consider Feedback in the development of the methodology - clarification/ context in para 2.2 around the aims of the HELAA</p> <p>Consider Feedback in the development of the methodology - clarification include reference to previous studies as sources of potential sites , amend para 2.2 .</p>
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Objections: (2),

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p>Renewable Energy Systems Ltd (HELAA009) Sites should also be specifically identified as suitable for onshore wind generation and renewable energy.</p>	<p>The HELAA approach is specifically aimed at the identification of sites suitable for residential and economic growth. It is considered that the identification of sites suitable for on shore wind</p>	<p>Consider Feedback in identifying a suitable approach in the identification of sites suitable for onshore wind generation outside of the HELAA.</p>

HELAA Schedule of Comments received and actions - Final June 2016

E Stage 1b Consultation Summaries

Private individual (HELLA,011) The Broads Authority area should not be included in the HELAA	will be through a separate technical process relevant to each local authority and emerging plans	
As a local planning authority in its own right and a member of the Norfolk Strategic Framework it is considered relevant that Broads Authority is included as part of this process	No change recommended	

Other / General comments (1)

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p>Hoveton Parish Council (HELLA017) Could it be clarified what HELAA's definition of 'redundant public sector land' Could it be clarified how redundancy is measured?</p>	<p>Redundant public sector land is land that is not specifically being utilised for a specific economic use and owned by other authorities other than the local authorities</p>	<p>Consider Feedback in the development of the methodology - clarification - combine bullet 4 & 5 - land in local authority/Broads Authority ownership and other public sector land that can be identified</p>

Stage 1b Consultation Summaries E

Q2) Do you agree with the proposed site size thresholds as set out in paragraph 2.4 - 2.6 of the proposed HELAA methodology?

Support (7): Private individuals (HELAA001), (HELAA002), (HELLA003), (HELAA.005), **HIGHWAYS ENGLAND**(HELAA006), **CBRE Ltd**, (HELAA015), Private individual (HELAA008)

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Agree with the proposed site size thresholds as set out in paragraph 2.4 - 2.6 of the proposed HELAA methodology	Support Noted	Consider Feedback support in the development of the methodology.

Objections: (6),

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Private individual (HELAA004) Any size should be considered if it complements the area. Bigger sites are starting to changer Norfolk too much.	National Planning Guidance states that the assessment should consider all sites and broad locations capable of delivering five or more dwellings or economic development on sites of 0.25ha (or 500m ² of floor space) and above. Where appropriate, plan makers may wish to consider alternative site size thresholds. It is not the purpose this document to assess small sites / single dwelling plots. Never the less it is recognised that in some authorities windfall allowances of small sites have historically contributed and will continue to contribute to the land supply. A windfall allowance is included in this methodology.	No change recommended
Private individual (HELAA 007)		

HELAA Schedule of Comments received and actions - Final June 2016

E Stage 1b Consultation Summaries

<p>Depends on site & adjacent services.</p> <p>HELAA 010 Ipswich BC We feel 0.25 hectares is a large site size threshold for urban areas although we recognise the five dwelling threshold could catch smaller sites. It may be worth considering a threshold of 0.1 hectares in dense urban areas.</p>	<p>Noted</p> <p>A windfall allowance approach is included in this methodology so that a reasonable assumption and proportion of smaller sites can be included in the assessment of land supply and capacity.</p>	<p>No change recommended</p> <p>No change recommended</p>
<p>Persimmon Homes HELAA 024 The site size thresholds as per the NPPG of 5 or more dwellings or sites of 0.25ha should be applied across all the districts</p>	<p>It is considered that in setting the more locally specific criteria especially for the more rural areas the HELAA will best reflect local circumstances in each district. This locally specific approach is in line with the approach advocated in the national PPG. Should a LPA not be able to identify sufficient site to meet the identified requirements then a finer grain assessment may be required and the assumptions revisited as detailed in stage 4.</p>	<p>No change recommended</p>
<p>Pigeon Investment Management HELAA 025 NPPG thresholds should apply</p> <p>Renewable Energy Systems Limited This relates to housing development and is not considering land suitable for onshore wind which would require much larger scales of available land.</p>	<p>See response above</p> <p>The HELAA approach is specifically aimed at the identification of sites suitable for residential and economic growth.</p>	<p>See response above</p> <p>No change recommended</p>

Stage 1b Consultation Summaries E

Q3) Do you agree with the criteria being suggested to automatically excluded a site from the suitability testing as set out in paragraph 2.7 of the proposed HELAA methodology?

Support: (10): Private individuals (HELAA001), (HELAA002), (HELAA003), (HELAA004), **HIGHWAYS ENGLAND** (HELAA006), Private individuals (HELAA007), (HELAA008), **Renewable Energy Systems Limited** (HELAA 009), **Historic England** HELAA 017, **Persimmon Homes** HELAA024

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Agree with the criteria being suggested to automatically excluded a site from the suitability testing as set out in paragraph 2.7 of the proposed HELAA methodology	Supported noted	Consider Feedback support in the development of the methodology.
Historic England HELAA 017 We welcome the exclusion from further assessment sites that fall within the scheduled area of a scheduled ancient monument	Support Noted	Consider Feedback support in the development of the methodology

Support in Part (5)

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Private individual HELAA005 Desktop does not provide sufficient information in some cases so site visits are a must.	The information required for the criteria is obtainable from a Desktop GIS search and is considered sufficient at this high level stage.	No change recommended
Ipswich BC HELAA 010		

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<p>In Ipswich, because of the nature and history of the urban area, scheduled ancient monuments are not necessarily a reason for excluding potential development sites.</p>	<p>Noted, These are irreplaceable historical assets and are protected by law. It is desirable that new development makes a positive contribution to local character and there are no adverse impacts that would significantly and demonstrably outweigh the benefits of development. The national PPG makes it clear that development should be restricted where there are national policies around designated heritage assets. (Para 3-044-2014:1006) and for the purpose of this capacity assessment such sites should therefore be excluded. Where the suitability of a site could be impacted the assessment criteria in appendix 1 allows for the significant of a heritage asset to be taken into account according to the available evidence. Should a LPA not be able to identify sufficient site to meet the identified requirements then a finer grain assessment may be required and the assumptions revisited as detailed in stage 4.</p>	<p>Consider Feedback support in the development of the methodology. – clarification</p> <p>Add additional clarifying text to Para 2.7. remove text <i>site as will be excluded from further assessment where they are ...and replace with sites will be removed from any further capacity assessment where they are:</i></p> <p>For clarity Amend para 2.21 sites identified as less suitable (red) at this stage will not be included in any capacity assessment as part of the HELAA but may be included in any site allocation assessment in emerging Local Plans.</p>
<p>Bidwells HELAA013/014 Whilst we agree with the criteria used, potential sites located within FRA 2 should be identified in the green category and not the amber category as proposed. As stated in the government guidance, although 'buildings used for dwelling houses' are classified as more vulnerable uses, it is considered that these more vulnerable</p>	<p>Support for the criteria noted. The issue of the specific classification is covered in Q8</p>	<p>Consider Feedback support in the development of the methodology</p>

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<p>uses are considered appropriate in FRA 2.....residential development can be located within FRA 2, the HELAA methodology should reflect this accordingly. Hoveton PC HELAA18</p>		
<p>The 5th Bullet - detailing exclusion criteria of Locally Designated Green Spaces, Designated Villages Greens and Common land is too narrow. Based on a review of the Aylesbury 's HELAA the following should be added as exclusions: High Quality Agricultural land, Scheduled Ancient Monuments and Listed Buildings and their settings. Historic Landscape and their settings.</p>	<p>Disagree – the national PPG para 3 – 044-20141006 indicates the exclusion criteria in line with the expectations of the NPPF when taken as a whole. Appendix 1 of the HELAA methodology outlines the Assessment Criteria, which demonstrates the approach to be taken in the assessment of landscape sensitivity and open space. The HELAA offers an initial sift of sites seeking to identify those most suitable and achievable. A full assessment including Sustainability Assessment will be undertaken through the site allocation process of a Local Plan where policy considerations such as agricultural land classification can be taken into account. Those sites with Scheduled ancient monuments are excluded as detailed in para 2.7 while the approach to the assessment around sensitivity of landscape and historic buildings is detailed in appendix 1.</p>	<p>No change recommended</p>
<p>CBRE LTD HELAA 015 No additional criteria, but locally designated green spaces should be defined - would this need to be a designation shown on the relevant Local Planning</p>	<p>LGS's are defined in the national PPG and can be brought forward as part of the Local Plan and or any Neighbourhood Plan. Local Green Space designation should not be used in a way that undermines the aim of plan making as set</p>	<p>No clarification necessary</p>

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<p>Authorities proposals map?</p>	<p>out in paragraph 77 of the NPPF.</p>	
<p>Objections: (1),</p>		
<p>SUMMARY OF COMMENTS/ISSUES RAISED</p>	<p>Response</p>	<p>Action / Recommendation</p>
<p>Pigeon Investment Management HELAA 025 It is not considered that certain criteria should automatically exclude sites at the desk-top review stage but that sites should be considered on their individual merits. Eg SPAs and their respective buffers should not be used to exclude sites and there have been appeal decisions where development has been accepted. Great clarity also needs to be provided in terms of the methodology's approach to areas within an SPA - are these sites within the SPA only, or does this also include any accompanying SPA buffer?</p>	<p>The aim of the HELAA is to identify the amount of land available for housing and economic development in order that a capacity assessment can be made of suitable land to inform Local Plan development. The assessment is an important evidence source to inform plan making, but does not in itself determine whether a site should be allocated for development. European legislation restricts development in SPAs and identified buffer zones. The national PPG makes it clear that development should be restricted where there are national policies that restrict development. (Para 3-044-20141006) and that such sites should be excluded from the HELAA process. It should be noted that the HELAA process is intended to provide an initial capacity assessment of sites only. It is recognised that in some cases local policy approaches may allow appropriate development subject to policy requirements and suitable agreed mitigation measures. Any such assessment should be</p>	<p>Consider Feedback in the development of the methodology.- add clarification as detailed above to para 2.7</p>

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	carried out during a more detailed site assessment as part of a local Plan review.	
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Q4) Do you agree with the proposed method to calculate development potential for housing schemes as set out in paragraphs 2.12 to 2.15?

Support: (13): Private individuals: HELAA001, HELAA002, HELAA003, HELAA004, HELAA005, HELAA006, Private individuals HELAA 007, HELAA 008, **Renewable Energy Systems Ltd**, HELAA 009, **Ipswich BC** HELAA010, **CBRE Ltd** HELAA015, **Historic England** HELAA 017, **NCC** HELAA 023

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Agree with the proposed method to calculate development potential for housing schemes as set out in paragraphs 2.12 to 2.15?	Support noted	Consider Feedback support in the development of the methodology
Natural England HELAA 017		
Para 2.13 welcome the reference exclusion from assessment sites that fall within the scheduled area of a scheduled ancient monument.	Support noted re exclusion of capacity assessment for sites that fall within the scheduled area of a scheduled ancient monument as detailed in para 2.7 (para 2.13 and footnote 5 make reference to a variation in density calculations respecting the planning history of a site and objective evidence only).	Consider Feedback support in the development of the methodology
Para 2.14 – recommend wording is amended to include <i>...., and impact on the setting of heritage assets.</i>	In terms of a site assessment the significant of the heritage asset and or the setting should be taken into account according to the available evidence.	Consider Feedback support in the development of the methodology - clarification around para 2.14 ist sentence and adding <i>... into account including the surrounding residential density and character, including impact on the setting of heritage assets</i>

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<p>NCC HELAA 023</p>	<p>The county council welcomes paragraph 2.15 which identifies the need for infrastructure such as primary school provision on larger sites.</p>	<p>Support noted</p>	<p>Consider Feedback support in the development of the methodology</p>
<p>Support in Part (3)</p>			
<p>SUMMARY OF COMMENTS/ISSUES RAISED Bidwells HELAA 013/014</p>	<p>Although this method of calculation is considered acceptable overall, a more consistent approach needs to be adopted to define specific densities with regards to similar types of sites across similar categories of settlements and parts of settlements. Similar density levels should be set for similar settlement types/locations irrelevant of which district a site is located within.eg density assumption should be no different on the edge of a principle settlement in Breckland and that of North Norfolk.</p>	<p>RESPONSE</p>	<p>Action / Recommendation</p>
<p>Support noted The national PPG states that the estimation of development potential should be guided by the existing or emerging plan policy including locally determined policies on density (para 3-017 - 20140306). It is considered that in setting the more locally specific criteria this way the HELAA will best reflect local circumstances in each district. Flexibility is then built into the approach as detailed in para 2.13- 2.15</p>	<p>No change recommended</p>	<p>The methodology builds in flexibility and allows for the individual characteristics of a site to be</p>	<p>No change recommended</p>
<p>Housing density needs to reflect that different densities</p>	<p>No change recommended</p>	<p>The methodology builds in flexibility and allows for the individual characteristics of a site to be</p>	<p>No change recommended</p>

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<p>will be appropriate in different parts of settlements, for instance, a high density figure such as that which might be appropriate on a site in a town centre may not be appropriate for sites at the edge of towns. Suggest that edge of town developments should be at a slightly lower-density than town-centre developments to reflect local character. This would also reflect the need to ensure the type of houses provided are appropriate to the location and the local housing market need.</p>	<p>taken into account in setting the appropriate density.</p>	
<p>Should the densities in South Norfolk and Broadland be more refined to take account of those parts of the district that about the Norwich City administration urban area</p>	<p>No 25dph is the default assumption that South Norfolk and Broadland DC use in plan making.</p>	<p>No change</p>
<p>Indigo Planning Ltd HELAA 019</p>		
<p>We agree that the starting point for calculating housing numbers should be based on the existing policies set out in each authority's adopted local plan, but only where plan policies are up to date and consistent with the NPPF.</p>	<p>Support noted</p> <p>Noted - the HELAA is a theoretical capacity assessment of land capacity only -they are intended to be indicative only.</p>	<p>No change recommended</p>

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<p>There are various approaches to calculating density and further clarification is required as to how densities would be calculated in practice against adopted policies. For example, what approach is proposed to defining net and gross developable areas?</p> <p>Lawson Planning HELAA 020</p> <p>Agree it is appropriate at this assessment stage to calculate development potential upon existing policy approach. HOWEVER it should be made clear they are indicative and only a guideline</p>	<p>The methodology builds in flexibility and allows for the individual characteristics of a site to be taken into account in setting the appropriate density</p>	
	<p>Support noted</p>	<p>Consider Feedback support in the development of the methodology – clarification insert <i>indicative</i> into para 2.12</p>

Objections: (3).

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p>Gladman Development HELAA 016</p> <p>Not all of the authorities in the HMA have a policy relating to housing density standards that have been confirmed as up to date.</p> <p>A standard density across the HMA should be applied using a figure of 30 dwellings per hectare. This</p>	<p>The Housing Market Area covers both rural and urban districts each with their distinct characteristics. In calculating the potential capacity of sites it is considered important to reflect the local planning authorities approach for consistency. This best reflects the typical development that comes forward.</p> <p>The methodology allows for flexibility to reflect</p>	<p>No change recommended</p>

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<p>should however allow for a degree of flexibility that can be achieved through a slight adjustment to density standards to reflect the local character of a surrounding area.</p>	<p>surrounding density & character as well as reflect masterplans and the development potential of large sites to provide for open space and other infrastructure requirements.</p>	
<p>Persimmon Homes HELAA024 Broadland and South Norfolk District Council refer to 25 dph, this should state, minimum of 25 dph.</p>	<p>The figures quoted reflect the current policy approach for the purpose of a capacity assessment. For this purpose they are intended to be indicative and act as a starting point to respond to local characteristics.</p>	<p>No Change recommended</p>
<p>Pigeon Investment Ltd HELAA025 The suggested approach does not appear to be linked to a particular policy approach or if they have been through examination . Suggest figures should be design led rather than a blanked figure and informed by landowner developer rather than LPA</p>	<p>The figures quoted reflect the current policy approach for the purpose of a capacity assessment. For this purpose they are intended to be indicative and act as a starting point to respond to local characteristics.</p>	<p>No Change recommended</p>

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Q5) Do you agree with the proposed method to calculate development potential for employment land as set out in paragraph 2.16 - 2.17?

Support: (12): Private individuals: HELAA001, HELAA002, HELAA003, HELAA004, , HELAA005, **Highways England** HELAA006, Private individuals: HELAA 007, HELAA 008, **Ipswich BC** HELAA 010, **Bidwells** HELAA 014, **CPRE Ltd** HELAA 015, **Persimmon Homes** HELAA 024

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Agree with the proposed method to calculate development potential for employment land as set out in paragraph 2.16 - 2.17?	Supported noted	Consider Feedback support in the development of the methodology.

Objections: (2),

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Renewable Energy Systems LTD We are concerned that this assessment will not consider the need for allocating areas suitable for onshore wind.	The HELAA approach is specifically aimed at the identification of sites suitable for residential and economic growth.	No Change recommended
Pigeon Investment Ltd HELAA025 There is no particular objection but the response reflects that it is difficult to agree with the method to calculate development potential for employment land when the consultation document does	Noted - The requirements for employment land will be determined through the Local Plan Process and appropriate evidence base. The suitability for a site to accommodate employment will be informed by this assessment.	No Change recommended

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<p>not really set out a method at this stage. It only sets out a range of potential sources of information, acknowledging (para 2.16) that the approach is still being determined and will be refined.</p>	
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Other / General comments (2)

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p>Bidwells HELAA 013 The methodology will need to take into account forthcoming changes to the NPPF, which will change the development potential of existing and allocated employment land, with a greater emphasis on their potential use for housing.</p>	<p>Sites will be assessed according to the potential uses put forward and identified. The requirements will be determined through the Local Plan Process.</p>	<p>No Change recommended</p>
<p>Gladman Development HELAA 016 The Councils' are not intending to undertake a single HMA employment land needs assessment. The Councils' should ensure that a variety of employment projections are used to determine the economic and demographic trends for each authority. Economic needs evidence</p>	<p>Noted - The requirements for employment land will be determined through the Local Plan Process.</p>	<p>No Change recommended</p>

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<p>should not be limited to the East of England Forecasting Model alone</p>		
<p>Hoveyton PC HELAA 018</p> <p>Section is loose and has the potential for shifting goal posts for employment land targets . Section is not in compliance with the NPPF para 160 which states that LPA should have a clear understanding of business needs</p>	<p>The site assessment methodology does not set employment targets. The requirements will be determined through the Local Plan Process. Sites will still undergo the relevant assessment by applying the criteria in Appendix 1.</p>	<p>No Change recommended</p>

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Q6) Do you agree with the proposed method to calculate development potential for town centre uses as set out in paragraph 2.18?

Support: (12): Private individual: HELAA001, HELAA002, HELAA003, HELAA004, HELAA005, **Highways England** HELAA006, Private individuals: HELAA 007, HELAA 008, **Renewable Energy Systems Limited** HELAA010, **Ipswich BC** HELAA 010, **Bidwells** HELAA014, **Persimmon Homes** HELAA 024,

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Agree with the proposed method to calculate development potential for town centre uses as set out in paragraph 2.18	Supported noted	Consider Feedback support in the development of the methodology

Support in Part (2)

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Bidwells HELAA013 The methodology will need to take into account forthcoming changes to the NPPF, which will change the development potential of existing and allocated employment land, with a greater emphasis on their potential use for housing	Sites will be assessed according to the potential uses put forward and or identified. The requirements will be determined through the Local Plan Process.	No Change recommended
Historic England HELAA 017 Refer to the 2010 research on the impact of Historic Regeneration incl Aylsham. Rpt concluded that by investing in	Noted. The development potential of sites will be assessed on a site by site basis and in line with specific uses identified / potential uses through emerging Local Plans, evidence and	No Change recommended

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<p>the historic environment places can increase their economic resilience by attracting visitors, shoppers and businesses all attracted by the historic environment</p>	<p>town centre strategies. It will be important to reflect on the benefits of Heritage assets in any emerging Local Plan Town Centre strategies.</p>	
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Objections: (1),

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p>Pigeon Investment Ltd HELAA025 Like the employment activities (Q5), it is acknowledged at para 2.18 that the local approach to evidence gathering is still to be determined, and sets out a range of potential sources of information. Therefore the approach cannot be supported at this stage when a full understanding has not been provided.</p>	<p>Noted - The requirements for town centres will be determined through the Local Plan Process and will be informed by appropriate evidence and emerging town centre strategies. Sites will still undergo the relevant assessment criteria in Appendix 1.</p>	<p>No Change recommended</p>

Other / General comments (1)

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p>Hoveton PC HELAA 018 Section is loose and has the potential for shifting goal posts</p>	<p>The site assessment methodology does not set employment targets or town centre strategies.</p>	<p>No Change recommended</p>

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<p>for employment land targets. Section is not in compliance with the NPPF para 160 which states that LPA should have a clear understanding of business needs</p>	<p>The requirements and strategic approaches will be determined through the Local Plan Process.</p>	
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Q7 Do you agree with the list of 'constraints' and 'impacts' at paragraph 2.19 of the proposed HELAA methodology?

Support: (12): Private individuals: HELAA001, HELAA002, HELAA003, HELAA004, HELAA005, **Highways England** HELAA006, Private individuals: HELAA 007, HELAA 008, **Ipswich BC** HELAA 010, **CBRE Ltd** HELAA 015, **Historic England** HELAA 017, **Persimmon Homes** HELAA 024

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Agree with the list of 'constraints' and 'impacts' at paragraph 2.19 of the proposed HELAA methodology	Supported noted	Consider Feedback support in the development of the methodology.
Historic England HELAA 017 We welcome the identification of landscape, townscape and historic environment as considerations as to a site's suitability	Supported noted	Consider Feedback support in the development of the methodology.

Support in Part (4)

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Anglian Water HELAA 012 Anglian Water are supportive of the inclusion of Utilities capacity and Utilities Infrastructure . For clarity we would suggest under the Utilities Infrastructure section reference is made to water / drainage infrastructure: <i>'Some sites may have strategic utilities infrastructure passing across it (either under or over ground), for example, power lines or gas pipelines, water supply pipes, sewers or pumping stations'</i>	Support welcomed. This is referenced in Appendix 1 Utilities Infrastructure	Consider Feedback support in the development of the methodology - Clarification Add text in the Utilities Infrastructure section Appendix 1 - including proximity to over ground and underground infrastructure.
Compatibility with Neighbouring /adjoining uses, however,	Noted. The proximity of a potential	Consider Feedback support in the development

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<p>there is no specific reference in the document to proximity to Water Recycling Centres (formally referred to as Sewage or Wastewater Treatment Works). In order to give our water recycling centres room to grow and enable us to operate efficiently in future, we need to maintain a suitable distance between them and the communities they serve. We use a risk assessment process to consider any proposed development within 400 metres of a water recycling centre or within 15 metres of a used water pumping station. Our policy and methodology for assessing a suitable distance can be viewed at: http://www.anglianwater.co.uk/developers/encroachment.aspx. Recommend reference to the need for early consultation with Anglian Water to determine the suitability of the location of the site in respect of odour risk is included in the document.</p>	<p>site to Water Recycling Centres could have an impact on amenity.</p>	<p>of the methodology - Clarification - add further clarifying text in Appendix 1- Compatibility with Neighbouring / adjoining uses</p>
<p>Bidwells HELAA 013/014 We have reviewed the lists and have some concerns. For instance, how will the Councils determine whether an impact or constraint is unsurmountable? The parameters for assessing this need to be clear. Who will determine market attractiveness? Will expert advice be sought</p>	<p>Noted. The approach around consultation with utility providers is included in Appendix A detailing the Suitability criteria around Utilities.</p>	<p>Consider Feedback support in the development of the methodology - Clarification Add text re early consultation with Anglian Water in para 2.25 and utility providers.</p>
	<p>The approach put forward is intended to be a broad high level assessment to inform local planning authorities of the suitable land capacity in each district. Planning judgement and experience will be used. The criterion around market attractiveness is detailed in Appendix 1. In terms of constraints the assessment should consider what action would be needed to remove them (along with when and how this could be undertaken and the likelihood of sites/broad locations being delivered). Landowners and developers have the opportunity to input through the call</p>	<p>No Change recommended</p>

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	for sites, continued dialogue and Local Plan process.	
Indigo Planning HELAA 019 Broadly agree with the identified list of constraints/impacts. The bar for achieving 'amber' should be lower on some of the more subjective constraints/impacts, to avoid the early discounting of certain sites.	The approach put forward is intended to be a broad high level assessment to inform local planning authorities of the suitable land capacity in each district. Planning judgement and experience will be used.	No Change recommended
Lawson Planning HELAA 020 Within Impacts Transport and roads should also refer to sustainable transport methods (public transport/ walking/ cycling)	It is important that all means of transport and accessibility are considered, however this is considered as part of a more detailed site specific assessment that should be part of any local plan assessment	No Change recommended

Objections: (2),

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Renewable Energy Systems Limited Not all of these constraints are relevant for onshore wind and additional constraints such as wind speed are more important. It is essential that planning officers are able to undertake an assessment with sufficient information relevant for the potential development they are assessing e.g The	The HELAA approach is specifically aimed at the identification of sites suitable for residential and economic growth. The consideration of a separate evidence base for the identification of on shore wind sites is for the individual planning authorities to pursue through the local plan process and or the Norfolk Strategic Framework.	No change recommended.

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<p>walking distance to local services is not relevant for onshore wind development. Compatibility with neighbouring uses is very vague and should be removed or clarified further.</p>	<p>Noted - see response above HELAA 012</p>	<p>Consider Feedback support in the development of the methodology Clarification - add further clarifying text in Appendix 1- Compatibility with Neighbouring / adjoining uses</p>
<p>Pigeon Investment Ltd HELAA025 It is recognised that consideration of 'market attractiveness' will be applied as one of many measures of deliverability. However, LPAs will need to ensure that they have access to sufficient expertise, finances and resources to make appropriate judgments on market attractiveness. In particular this can be quite fluid and change quickly subject to a range of factors and, therefore, it needs to be ensured that there is the ability for LPAs to monitor and respond to such changes and the mechanism for the HELAA to be updated accordingly.</p>	<p>The approach put forward is intended to be a broad high level assessment to inform local planning authorities of the suitable land capacity in each district. Planning judgement and experience will be used. The criteria around market attractiveness is detailed in Appendix 1 .</p>	<p>No change recommended.</p>

Other / General comments (2)

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation

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<p>Gladman Developments</p> <p>It is noted that any impacts and constraints which result in a red classification will be discounted from the HELAA as these issues are considered to be insurmountable. The Councils' should ensure that they fully consider all issues and whether any potential impacts can be successfully mitigated. This should be achieved in collaboration with a developer and/or landowner prior to making any formal decision to discount a site from the assessment. The Councils' should ensure that these sites are revisited on an annual basis to determine whether the issues that have been previously identified are still applicable or whether new evidence is available that demonstrates any constraints can be successfully mitigated</p>	<p>Noted - The approach put forward is intended to be a broad high level assessment to inform local planning authorities of the suitable land capacity in each district. Planning judgement and experience will be used.</p> <p>The aim of the HELAA is to identify the amount of land available for housing and economic development in order that a) a capacity assessment can be made of suitable land to inform Local Plan development and b) inform more detailed site assessment in any Local Plan process.</p> <p>The approach put forward is one that is recommended through the national PPG and one that ensures that all land is assessed together as part of plan preparation to identify which sites or broad locations are the most suitable and deliverable for a particular use.</p>	<p>No change recommended.</p>
<p>NCC HELAA 023</p> <p>If a site is deemed broadly sustainable but does not meet one of the sustainability criteria then it shouldn't be ruled out. Mitigation could be identified through further analysis of</p>	<p>The approach put forward is one of flexibility and is intended to be a broad high level assessment to inform local planning authorities of the suitable land capacity in each district. The identification of Amber and green sites allows a degree of flexibility and planning</p>	<p>Consider Feedback support in the development of the methodology - Clarifications</p> <p>Add clarity in text around the approach in section 2.19 – 2.34. Add para 2.21 "red" impacts and constraints rule out the suitability of a site <u>at this stage in any calculation of suitable land capacity. Add para 2.33</u> in order to be</p>

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<p>technical constraints such as flood risk.</p>	<p>judgement to be used around potential impacts and potential for mitigation. More detailed assessment of sites will be undertaken through the local plan process.</p>	<p>included in the <u>HELAA and in any calculation of suitable land capacity</u>. of stage 2.</p>
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Q8) Referring to Appendix A of the proposed HELAA methodology, please add below any comments you may have on the 'red', 'amber' and 'green' criteria relating to each of the identified constraints/impacts?

General Comments (17)

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p>Private individual HELAA 001 Please build more bungalows for people with disabilities and downsizing opportunities.</p>	<p>The type and tenure of dwellings will be addressed through any emerging policies of the Local Plans and based on national policy requirements and evidence.</p>	<p>No change recommended.</p>
<p>Private individual HELAA 005 Give proper consideration to how some obstacles can be overcome.</p>	<p>The approach put forward is intended to be a broad high level assessment to inform local planning authorities of the suitable land capacity in each district. Planning judgement and experience will be used.</p>	<p>No change recommended.</p>
<p>Highways England HELAA 006 I am content with the proposals on the basis that Highways England will be consulted for their views and concerns and to input into all development.</p>	<p>Noted</p>	<p>No change recommended.</p>
<p>Renewable Energy Systems Limited HELAA 009 Not all of these constraints are relevant for onshore wind and additional constraints such as wind speed are more important. It is essential that planning officers are able to undertake an assessment with sufficient information relevant for the potential development they are assessing e.g. it would be difficult for an officer to assess market opportunities for many industries such onshore wind</p>	<p>The HELAA approach is specifically aimed at the identification of sites suitable for residential and economic growth. The consideration of a separate evidence base for the identification of on shore wind sites is for the individual planning authorities to pursue through the local plan process and or the Norfolk Strategic Framework.</p>	<p>No change recommended</p>
<p>Utilities assessment should be undertaken by a developer who will have greater insight of possible mitigation rather than a</p>	<p>The approach put forward is intended to be a broad high level assessment to</p>	<p>No change recommended</p>

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<p>planning officer</p>	<p>inform local planning authorities of the suitable land capacity in each district. Planning judgement and experience will be used. The methodology also identifies the requirement to liaise with appropriate infrastructure providers.</p>	
<p>NCC HELAA 023 If a site is deemed broadly sustainable but does not meet one of the sustainability criteria then it shouldn't be ruled out. Mitigation could be identified through further analysis of technical constraints such as flood risk.</p>	<p>The approach put forward is one of flexibility and is intended to be a broad high level assessment to inform local planning authorities of the suitable land capacity in each district. The identification of Amber sites allows a degree of flexibility and planning judgement to be used around potential impacts and mitigation. More detailed assessment of sites will be undertaken through the local Plan process and site assessments which the HELAA site categories will inform.</p>	<p>No change recommended</p>
<p>Pigeon Investment Management HELAA 025 the R/A/G ratings should be guidance only and not prescriptive for a site's inclusion.</p>	<p>The approach put forward is one of flexibility and is intended to be a broad high level assessment to inform local planning authorities of the suitable land capacity in each district. The aim of the HELAA is to identify the amount of land available for housing and economic development in order that a) a capacity assessment can be made of suitable land to inform Local Plan development and b) inform more detailed site assessment in any Local Plan process.</p>	<p>Consider Feedback support in the development of the methodology - Clarifications as detailed above in question 7.</p>

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<p>Suitable provision should be made for landowners/developers to review and respond to the LPA on the site assessment made, and demonstrate the suitability and sustainability of their site.</p>	<p>As detailed in para 3.2 - All sites in each LPA area will be consulted on as part of the consultation on the respective emerging Local Plans</p>	<p>No change recommended</p>
<p>Concern raised around whether the HELAA stage is too premature to make proper judgements and whether the LPA have access to sufficient expertise and resources to make such judgements. This includes judgements on market conditions, viability for infrastructure and contamination</p>	<p>The aim of the HELAA is to identify the amount of land available for housing and economic development in order that a) a capacity assessment can be made of suitable land to inform Local Plan development and b) inform more detailed site assessment in any Local Plan process. The approach put forward is one that is recommended through the national PPG. All sites in each LPA area will be consulted on as part of the consultation on the respective emerging Local Plans</p>	<p>No change recommended</p>

Criteria comments

Access

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p>Ipswich BC HELAA010A Access Whilst accessibility is important it is difficult to rule out the suitability of a site due to poor access – otherwise in rural areas you will end up ruling out most sites. You could also end up ruling out large sites which have the potential to provide new services.</p>	<p>The criteria is one around can a suitable access be provided. The opinion of Highways will be sought as well as planning judgement with regard constraints</p>	<p>No change recommended</p>
<p>Bidwells HELAA 013 (014) Access to Site - We believe that the Amber category should say -</p>	<p>Planning judgement call based on local knowledge and evidence of third party</p>	<p>No change recommended</p>

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<p>"...these can be overcome through development or the purchase of third party land from a willing landowner".</p>	<p>availability will need to be applied</p>	
<p>Accessibility to local services and facilities</p>		
<p>SUMMARY OF COMMENTS/ISSUES RAISED</p>	<p>RESPONSE</p>	<p>Action / Recommendation</p>
<p>Bidwells HELAA 013 (014) We believe that the Red category should say - "No core services (or no ability to provide/fund new core services) within 800m/10-minute walking distance of the site". This should also be reflected in the Amber and Green categories.</p> <p>CBRE ltd HELAA 015 We consider that the 800m zone should be extended to 1,000m - there are areas of land suitable for allocation on the edge of sustainable settlements which might only be within 800m of 1-3 core services. However, they are within 1,000m of many more core services.</p> <p>We consider that this distance should be increased for land adjacent to settlements which are identified as focused areas for growth. In addition, we consider it should be made clear that planned facilities (e.g. in Site Allocations) can be taken into consideration.</p> <p>Gladman Developments LTD HELAA 016 Research indicates that acceptable walking distances will depend on a number of factors such as the surrounding area, local facilities, the type of amenity offered etc. The Chartered Institution of Highways and Transportation (CIHT) document entitled 'Providing for Journeys on Foot (2000)' suggests that accessibility to services can be extended to a preferred maximum distance of 1,200m. The methodology should instead refer to the preferred maximum walking distances contained in</p>	<p>Noted - it is considered that large sites have the potential to deliver on site facilities</p> <p>Noted - In assessing sites against this measure, accessibility to a range of services is expected and planning judgement is called for depending on local circumstances.</p>	<p>Consider Feedback in the development of the methodology - Clarification - amend red category to reflect suggested change.</p> <p>Consider Feedback in the development of the methodology - Clarification - amend text to clarify approach 1 or more services in line with CIHT advice below .</p>
	<p>Noted - The Institute of Highways and Transportation report recommends a distance of 800m in town centres and 1,200 elsewhere. Within the HMA and across the districts there are many different townscapes and streetscapes across urban and rural areas. The report also recommends that 2,000m is an acceptable walking distance for</p>	<p>Consider Feedback in the development of the methodology - Clarification add 800m in urban areas and up to 1,200m elsewhere. 2,000 for employment and school as advised by the CIHT.</p>

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<p>national guidance.</p> <p>Lawson Planning Partnership HELAA 020 Accessibility to local services . 800m Criteria is overly restrictive and does not take account of Government guidance towards accessibility and transport in rural areas. Recommend that account should be taken to include accessibility by public transport and cycling infrastructure in addition to walking distances – this modification will accord with the NPPF para 29 to recognise variations in rural and urban areas . There is a requirement to distinguish between the characteristics and assessment criteria for both urban and rural areas to enable suitable housing development to be provided in each location. Overly restrictive criteria could prevent suitable sustainable sites within rural areas from being positively considered for development by NNDC. NPPF Para 47, 159, 54,55 and PPG Ref ID 50-001-20140306 put forward as supportive. Sites in rural areas <i>should be considered where it will enhance or maintain the viability of rural communities</i> NPPF para 54</p>	<p>school access and employment Noted Please see response above</p>	<p>Noted Please see response above</p>
<p>NCC HELAA 023 Access to local services and particularly health services 'by means other than car'. This is in keeping with theme 2 (vibrant neighbourhoods) and theme 3 (active lifestyles) of the draft health impact assessment checklist.</p> <p>Persimmon Homes HELAA 024 Accessibility Concern re the discounting of sites more than 800 m from core services. Whilst it is acknowledged that this is a guide for assessment purposes, it should allow for /encourage the assessor to apply a certain degree of Judgement. Suggest approach red - If there are 2 or more core services within a 1,000m/ 10-15 minute walking distance or 3 or more core services within 1,200m/ 15 minute walking distance of the site, it can be categorised as Amber)</p>	<p>Support noted</p> <p>Noted Please see response above</p>	<p>Consider Feedback in the development of the methodology</p> <p>Noted - Please see response above</p>

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<p>Suggested approach Amber - (If there are 5 or more core services within a 1,200m/ 15 minute walking distance of the site, it can be categorised as Green)</p> <p>Pigeon Investment Management HELAA 025 - it should be noted that larger sites have the ability to provide such services.</p>		
	<p>Noted - it is considered that large sites have the potential to deliver on site facilities. Please see response above</p>	<p>Noted - Please see response above</p>

Utilities Capacity

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p>Anglian Water HELAA 012 We would recommend reference to the need for early consultation with Anglian Water to determine the suitability of the location of the site in respect of odour risk is included in the</p>	<p>Noted. Consultation with Utility providers is included in Appendix A detailing the Suitability criteria around Utilities.</p>	<p>Add text re early consultation with Anglian Water in para 2.25 and utility providers.</p>
<p>Bidwells HELAA 013 (014) The lack of utility capacity should not automatically rule out the development of an entire site. We accept it may limit potential numbers on a site,</p>	<p>The criterion is not seeking to rule out a site if no infrastructure is present but identify if there are limiting factors which would prevent delivery</p>	<p>No change recommended</p>

Utilities Infrastructure

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p>Bidwells HELAA 013 (014) If utilities infrastructure on a site is limited, a potential site for development should not be ruled out in its entirety because of this. Additionally, it is accepted that it may restrict potential number of units (or uses) that could be located on a site</p>	<p>The criterion is not seeking to rule out a site if no infrastructure is present but identify if there is any limiting factors around strategic infrastructure such as pipelines under a site. In assessing sites against this measure, planning judgement is called for depending on local circumstances</p>	<p>No change recommended</p>

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<p>NCC HELAA 023 Utilities Infrastructure Some of the categories need some stronger direction. For example, in the section 'utilities infrastructure', there is the statement: 'Whilst this does not provide an absolute constraint to development, it may limit the development potential of the site or involve additional costs which may affect the viability of the site.' This wording could be included in the subsequent statement relating to 'Flood Risk'.</p>	<p>Noted</p>	<p>Clarification .Add suggested clarification to Flood Risk section</p>
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Flood Risk

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p>Bidwells HELAA 013 (014) Potential sites located within FRA 2 should be identified in the Green category and not the Amber category as proposed. As stated in the government guidance, although 'buildings used for dwelling houses' are classified as more vulnerable uses, it is considered that these more vulnerable uses are considered appropriate in FRA 2. The relevant parts of this guidance are highlighted and enclosed within this letter accordingly. Therefore, on this basis, residential development can be located within FRA 2, the HELAA methodology should reflect this accordingly.</p>	<p>Noted - all development in Zone 2 should be accompanied by a flood risk assessment. At this high level stage it is considered appropriate to remain cautious and mark the site as amber.</p>	<p>No change recommended</p>

Coastal Change

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p>Bidwells (HELAA014 only) - We do not agree that</p>	<p>The NNDC Core Strategy EN11 refers</p>	<p>Consider feedback in the development of the</p>

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<p>the Coastal Change Management Area/Coastal Flood Hazard Zones require a 30m buffer zone. Development up to the edge of the zones should be considered suitable. If there is a danger that development within 30 metres of the zone may be affected, then the zones are incorrectly drawn.</p>	<p>to Coastal Erosion Constraint Area where no development will be permitted. There is no requirement for further assessment should a site fall into this area. It is appropriate that sites that fall into a Coastal Erosion Constraint area should be screened out at an early stage.</p>	<p>methodology - Clarification recommended that the Coastal Change criterion is amended to show adjacent and removed from any management area in the amber and green categories. Sites that are subject to coastal erosion and within the Coastal management Area should be excluded from further assessment.</p> <p>Sites that are identified as at risk from coastal erosion should be added to the list of exclusions as detailed in para 2.7.</p>
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Market Attractiveness

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p>Bidwells HELAA 013 (014) Market Attractiveness – We are concerned about how Councils will judge Market attractiveness. We suggest expert advice should be sought, especially as the market is often fickle and subject to change</p>	<p>The approach put forward is intended to be a broad high level assessment to inform local planning authorities of the suitable land capacity in each district. Planning judgement and experience will be used. The criterion around market attractiveness is detailed in Appendix 1.</p>	<p>No change recommended</p>

Landscape, Strategic gaps and Agricultural Land

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p>Bidwells HELAA 013 (014) The protection of local designations appears to place greater emphasis than what is expected by National Planning Policy</p>	<p>Noted. The potential impacts on landscape are an important consideration. Assessment should be</p>	<p>Consider Feedback in the development of the methodology.</p>

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<p>(NPPF). The definition of 'other landscape' needs to be better explained and defined. Currently, it is too open ended and is ambiguous. (HELAA 013 only) - Consideration of a development scheme should be balanced between the deliverability of housing supply within a District and the protection of landscape features.</p>	<p>in line with the requirements of the NPPF.</p>	<p>Clarification – update text removing <i>other landscapes</i> in the red criteria and update amber criteria accordingly. Remove reference to review of agricultural classifications</p>
<p>Gladman Developments LTD HELAA 016 Reference to NPPF para 116 has been taken out of context as this is made in context to those designations identified in para 115 only. It is not appropriate to discount sites purely because they are in a locally designated policy area such as strategic Gap or Landscape character area. Such site is seen as relevant to the supply of housing ref Suffolk coastal DC v Richborough & Hopkins homes V Cheshire East. As such sites should not be discounted from the HELAA simply because they are located within any local designation.</p>	<p>The region has a number of nationally and locally specific landscapes. If a local planning authority cannot identify sufficient capacity to meet its own OAN through this methodology, then in the first instance consideration should be given to the need to revisit the assessment undertaking a finer grained assessment based on a review of the assumptions and relevant guidance. If, following this there is still insufficient sites then it will be necessary to investigate how this shortfall can be planned for. This process is specified in para 2.43.</p>	<p>Consider Feedback in the development of the methodology – Clarification, recommend that additional text is inserted para 2.44 around the requirement to review appropriate assumptions if after the assessment sufficient capacity is not identified in order to meet OAN.</p>
<p>Historic England HELAA 017 We would recommend that Registered Parks and Gardens, and the setting of heritage assets, are included as sensitive landscapes.</p>	<p>Noted . For the purpose of this capacity assessment it is considered appropriate to reflect the national PPG and NPPF as above.</p>	<p>Consider Feedback in the development of the methodology - Clarification reflects the comments above</p>
<p>Natural England HELAA022 Amend text to include sensitive landscapes include – areas within and in the setting of the Norfolk Coast AONB</p>	<p>Noted</p>	<p>Clarification include suggested text in definition</p>

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Townscape

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p>Indigo Planning HELAA 019 Townscape impact is highly subjective and whilst being a useful assessment criterion, the bar should be set low in the initial round of site assessment ie townscape impacts should be given more weight at a later stage of the assessment process. In any event, townscape impact can be addressed through detailed design work.</p>	<p>Noted Planning judgement and experience will be used.</p>	<p>No change recommended</p>
<p>Pigeon Investment Management HELAA 025 Townscape - The presence of protected trees in terms of landscape etc.... impacts would also not necessarily preclude development, and again it would seem too early to make such judgments at the HELAA stage. It is not considered that a presumption should be applied that development will be harmful as this will be subject to detail.</p>	<p>Noted . Planning judgement and experience will be used. However the text could benefit from additional comments around the amount of weight to be applied and in what areas as defined in NPPF para 116.</p>	<p>Consider Feedback in the development of the methodology. Align the assessment to the areas covered in the landscape assessment criteria above and detailed in the NPPF.</p>
<p>Historic England HELAA 017 Townscapes we welcome the identification of townscape as part of the methodology.</p>	<p>Support noted</p>	<p>Consider Feedback support in the development of the methodology</p>

Biodiversity and Geodiversity

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p>Bidwells HELAA 013 (014) Similar to above, the protection of local designations appears to place greater emphasis than what is expected by National Planning Policy (NPPF). These should not be given the same status and protection as internationally designated sites. (HELAA 013 only) - With appropriate ecological investigation,</p>	<p>Noted . The potential impacts on Biodiversity and geodiversity are an important consideration. The NPPF seeks to minimise impacts and prevent harm. It is considered the approach is consistent with the NPPF</p>	<p>No change recommended</p>

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<p>survey and recording such constraints can be overcome.</p> <p>Natural England HELAA 022 Following features should be listed:</p> <ul style="list-style-type: none"> • priority habitats • veteran trees, ecological networks; and • priority and/or legally protected species populations. <p>Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP).</p> <p>Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds).</p>	<p>Noted</p>	<p>Consider Feedback in the development of the methodology - Add recommended text</p>
<p>Pigeon Investment Management HELAA 025 There needs to be far greater clarity on the potential impact on SPAs. For example with regard to ground-nesting birds, buffers have been applied around the SPA that are seen as a constraint to site selection. However, development can take place in such locations as demonstrated with planning permissions granted subsequent to this policy. Further detail is required in terms of the application of the biodiversity and geodiversity criteria</p>	<p>The approach put forward is intended to be a broad high level assessment to inform local planning authorities of the suitable land capacity in each district. Planning judgement and experience will be used. The local Plan process offers the opportunity for a more detailed assessment</p>	<p>No change recommended</p>

Historic Environment

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SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p>Bidwells HELAA 013 (014) Guidance on how impacts on the Historic Environment need to be made clearer, including details on how these will be quantified. The methodology refers to the importance of assessing heritage assets such as archaeological potential. Although we agree this should be a consideration, it should not be an absolute constraint and should not hinder development. With appropriate archaeological investigation, survey and recording such constraints can be overcome.</p>	<p>Agreed. The level of impacts depend on the proposed use. The approach put forward is intended to be a broad high level assessment to inform local planning authorities of the suitable land capacity in each district. Planning judgement and experience will be used. The local Plan process offers the opportunity for a more detailed assessment.</p>	<p>No change recommended</p>
<p>Historic England HELAA 017 We would recommend that these words are added, "Heritage assets are buildings, monuments, sites, landscapes, and places identified..." We also would suggest that these words are added, "Non-designated Heritage Assets can include locally listed buildings, non-registered parks or gardens, sites with archaeological potential..."</p>	<p>Noted</p>	<p>Consider Feedback in the development of the methodology - Add recommended text</p>

Open Space

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p>Bidwells HELAA 013 (014) Open Space – Open Space should only be considered a constraint if it is designated as such in an adopted plan. Also, designations should only be given weight where they are supported by up-to-date Open Space Assessment or Strategy needs to be formed and implemented. (HELAA 013 only) - Consideration of new housing development</p>	<p>Noted - the provision and protection of appropriate open space is seen as an important consideration and is outlined in the NPPF para 74 and national PPG</p>	<p>Consider Feedback in the development of the methodology - Clarification add Local Green Space designation in line with guidance</p>

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<p>schemes which provide additional access to Open Space should be decided favourable and overall benefits to the local community seen as a positive contribution.</p> <p>Natural England HELAA022</p> <p>Open Space it would be helpful to include references to green infrastructure (GI) under this heading. HELAAs should consider the availability and the need to maintain of GI, and opportunities to enhance GI networks when considering sites for development. Potential sites should be considered against each planning authority's GI strategy (where one exists) to ensure a strategic overview and maintain coherence of ecological networks.</p>	<p>Noted</p>	<p>Consider Feedback in the development of the methodology - Clarification add GI into heading.</p>
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Compatibility with neighbouring/adjoining areas

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p>Anglian Water HELAA 012</p> <p>Noted the section on Compatibility with Neighbouring /adjoining uses, however, there is no specific reference in the document to proximity to Water Recycling Centres (formally referred to as Sewage or Wastewater Treatment Works). In order to give our water recycling centres room to grow and enable us to operate efficiently in future, we need to maintain a suitable distance between them and the communities they serve.</p> <p>We use a risk assessment process to consider any proposed development within 400 metres of a water recycling centre or within 15 metres of a used water pumping station. Our policy and methodology for assessing a suitable distance can be viewed at: http://www.anglianwater.co.uk/developers/encroachment.aspx.</p> <p>NCC HELAA 023</p>	<p>Noted. The proximity of a potential site to Water Recycling Centres could have an impact on amenity. In assessing the suitability of sites, account will be taken of standing advice from statutory undertakers and infrastructure providers with regard to maintaining appropriate separation between new development and existing infrastructure installations.</p>	<p>Consider Feedback in the development of the methodology - Clarification - add further clarifying text in Appendix 1- Compatibility with Neighbouring / adjoining uses as detailed.</p>
<p>NCC HELAA 023</p>	<p>Noted see response above.</p>	<p>No change recommended</p>

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<p>The ability for a site to protect and enhance/promote green space, sports facilities could be a useful addition Greater prominence could be given to factors such as noise, air pollution light pollution in the compatibility with Neighbouring uses section</p>	<p>The level of impacts depend on the proposed use. The approach put forward is intended to be a broad high level assessment.</p>	
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Q9) Do you agree with the assumptions that will be made when assessing the potential for development from windfall sources?

Support: (10): Private individuals: HELAA001, HELAA002, HELAA003, HELAA004, HELAA005, HELAA006, Private individuals: HELAA 007, HELAA 008, **CBRE** HELAA015, **Pigeon Management Ltd** HELAA 025

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Agree with the assumptions that will be made when assessing the potential for development from windfall sources	Supported noted	Consider Feedback support in the development of the methodology
Pigeon Management Ltd HELAA 025		
No particular comments on the assumptions made with regard to windfall sites, which by their nature are difficult to predict.	Noted	Consider Feedback support in the development of the methodology

Support in part s: (1),

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Persimmon Homes HELAA 024 NPPG states that Starter Homes on exception sites should not contribute towards 5 year housing land supply.	Noted	Consider Feedback support in the development of the methodology

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Objection (3)

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p>Renewable Energy Systems Limited HELAA 009 Again this is more focused on housing and small businesses. An onshore wind farm could encourage windfall sites of over a 100 hectares so using "only average delivery rates for sites under 0.25 hectares will be considered." is not appropriate.</p>	<p>The HELAA approach is specifically aimed at the identification of sites suitable for residential and economic growth.</p>	<p>No Change recommended</p>
<p>The Local Plan and HELAA document does not identify any areas suitable for onshore wind or a methodology. This approach is not a proactive or positive. The omission of sites for renewable energy in a local plan and HELAA is considered a soundness issue by RES. Rotherham BC draft sites & policy Plan identifies suitable wind sites by criteria and RES support this approach as an effective method</p>	<p>It is considered that the identification of sites suitable for on shore wind will be through a separate technical process relevant to each local authority and emerging plans</p>	<p>No Change recommended</p>
<p>Ipswich BC HELAA 010 It is suggested to use historic rates for windfall from each local authority on sites irrespective of size over a reasonable time period and</p>	<p>Noted . it is considered that limiting site size to 0.25 is robust and avoid the potential for double counting</p>	<p>No Change recommended</p>

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<p>then take the average, rather than restricting it to sites of less than 0.25 hectares for an average to be taken</p> <p>Indigo Planning HELLA 019</p> <p>Assumptions about windfalls must be based on locally-relevant evidence. There are likely to be more windfall sites in Norwich for example, as a result of the office to residential permitted development (PD) rights. Such PD rights will be lesser relevance in terms of windfall contribution in the more rural districts. In such rural districts, PD rights enabling the conversion of agricultural buildings to residential use will clearly be of more relevance, but the numbers involved will be modest (in the context of office to residential PD).</p> <p>Para 2.36 suggests that environmental constraints will prevent some LPAs from being able to allocate enough land to meet their need and therefore they'll need to rely on windfalls. This is inconsistent with the NPPF's requirement</p>	<p>Noted the proposed approach is flexible across each LPA and allows for local assumptions around PD rights.</p> <p>The aim of the HELAA is to identify the amount of land available for housing and economic development in order that a capacity assessment can be made of suitable land to inform Local Plan development. The national PPG states that any windfall allowance included should be justified. The approach is detailed in para 2.35- 2.42 of the HELAA methodology.</p> <p>Starter homes will provide an element of affordable homes in line with relevant local and national policies.</p>	<p>Consider Feedback in the development of the methodology – clarification remove reference to starter homes in para 2.41.</p>
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<p>that LPAs plan to meet the full objectively assessed need of an area.</p> <p>Para 2.41 states that the emergence of the Starter Homes initiative may increase the amount of windfall development. In relation to Starter Homes, the NPPG (Ref. ID 55-010-20150318) however advises that "... local planning authorities should not make an allowance for them in their five-year housing land supply until such time as they have compelling evidence that they will consistently become available in the local area."</p>		
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Further Comments (1)

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p>Gladman Developments LTD HELAA 016</p> <p>In light of the issues identified above, it is recommended that the Councils establish a joint panel with members from both the public and private sectors to discuss individual sites and to act as a critical friend in</p>	<p>As detailed in para 3.2 - All sites in each LPA area will be consulted on as part of the consultation on the respective emerging Local Plans. As part of the process input will be sought from appropriate bodies as required.</p>	<p>No Change recommended</p>

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<p>relation to the Council's reasoning behind any assumptions on market attractiveness, lead in times, build out rates and site specific viability issues. This will help ensure that the HELAA is based on appropriate evidence and is robust enough to help inform the preparation of Local Plans across the HMA</p>		
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Figure 18 HELAA Methodology consultation schedule of comments

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Appendix F: Stage 1b Consultation Evidence

F.1 HELAA Example Correspondence

NORTH NORFOLK DISTRICT COUNCIL
 HOLT ROAD CROMER NORFOLK NR27 9EN
 Telephone 01263 513811
 Fax 01263 515042
 www.north-norfolk.gov.uk



2 February 2016

Sent to General & Specific Consultees

Dear Sir or Madam,

The Norfolk Councils have collectively agreed to prepare the Norfolk Strategic Framework (NSF) to inform the development of each Council's Local Plan covering the period 2016-2036. As the first part of this process we are collectively preparing a joint Housing & Economic Land Availability Assessment Methodology (HELAA Methodology). It is our intention to hold a period of targeted consultation on the HELAA methodology in March 2016 with statutory consultees, a selection of national and local developers and major landowners operating in each district.

Due to the logistics of co-ordinating a large consultation over the breadth of Norfolk, it is proposed that a Norfolk Strategic Framework Consultation Database is prepared. Your details are currently recorded on our local plan consultation database, however for data protection issues, I am asking:

- a) If you are willing to participate in this consultation, either as an individual, or on behalf of your client(s), and;
- b) If yes, do you give North Norfolk District Council permission to share your contact details and hold them on the Norfolk Strategic Framework database (the NSF database)?

The data held on the NSF database will only be used in the conjunction with the preparation of the Norfolk Strategic Framework (NSF), and to contact you, if necessary, regarding future consultations. Your details will still be held by North Norfolk District Council on our separate Local Plan consultation database.

It would be helpful if you could get reply with an answer to the above two questions by no later than the **22nd February 2016**. If we do not hear from you we will assume you do not wish to be included on the NSF database and we will not share your data. Please reply by email to planningpolicy@north-norfolk.gov.uk or by post to Planning Policy, NNDC Offices, Holt Road, Cromer, NR27 9EN.

Yours faithfully,

Sarah Ashurst
 Planning Policy Team Leader



Stage 1b Consultation Evidence F

NORTH NORFOLK DISTRICT COUNCIL
 HOLT ROAD CROMER NORFOLK NR27 9EN
 Telephone 01263 513811
 Fax 01263 515042
 www.north-norfolk.gov.uk



17 March 2016

Sent to General & Specific Consultees

Dear Sir or Madam,

Housing and Economic Land Availability Assessments (HELAAAs) are key evidence documents which support the preparation of Local Plans. Their main function is to test if there is sufficient land to meet Objectively Assessed Need¹ (OAN) and help Local Planning Authorities (LPAs) understand the level of growth to plan for and the areas where growth can be accommodated.

The methodology for how to carry out a HELAA is set out in the National Planning Practice Guidance (NPPG). It is proposed to adopt a consistent methodology to the production of HELAAAs across all of the Norfolk authorities.

We are writing to invite your views on the proposed HELAA methodology which will be used by all LPAs in Norfolk when preparing their Assessments. The consultation runs from **Monday 21 March 2016** and closes on **Tuesday 3 May 2016**. We ask that all comments are submitted to **North Norfolk District Council** who are hosting the consultation on behalf of each Norfolk authority, and that comments are submitted on the standard response form.

A copy of the proposed HELAA methodology document and the response form can be found at www.north-norfolk.gov.uk/helaa. Responses can be completed online, or a form can be downloaded for completion at a later time. Please return forms to planningpolicy@north-norfolk.gov.uk or by post to: Planning Policy, NNDC, Holt Road, Cromer, NR27 9EN.

Thank you in advance for your comments.

Yours faithfully,

Mark Ashwell
 Planning Policy Manager

¹ Objectively Assessed Need (OAN) means identifying both the market *demand* for new housing, and, the *need* for homes, including the needs of those who are currently unable to afford to buy or rent a suitable property locally.



Figure 20 Example Correspondence - Invite for views on HELAA Methodology

F Stage 1b Consultation Evidence

27 October 2017



Sent to all Agents, Developers & Landowners
on the Local Plan Consultation Database

Dear Sir / Madam,

North Norfolk Local Plan: selection of sites for future development

We wrote to you on 20th July advising of an opportunity to submit additional information in support of sites proposed for allocation in the emerging Local Plan. For those that submitted additional information, thank you, we have noted your response(s) and will ensure that this information is considered carefully as we progress.

Over the coming months a number of Council decisions will be made as to the overall strategy for development. This includes the proposed settlement hierarchy (which specifies the locations where future residential development and the majority of new commercial development will be permitted) and the overall housing target. In parallel to this we will be carrying out more detailed site assessment and sustainability appraisal of those sites **which align with the emerging strategy**. As and when there is a need for further dialogue we will contact you directly.

At this stage it is considered highly unlikely that the Council will seek to formally allocate small sites (less than 10 dwellings) for development or identify development sites in locations which do not have access to suitable services. This does not preclude the possibility of smaller scale developments being allowed via the inclusion of supportive policies in the Local Plan. The Council's preferred approach to smaller scale developments will be outlined in the draft Plan.

As this work advances we will be seeking member agreement on sites with the Planning Policy & Built Heritage Working Party, and Cabinet, leading up to the preparation of a **First Draft Local Plan** for consultation, which we aim to publish in Spring 2018. As the choice of sites is directly linked to the emerging strategy for development in North Norfolk I recommend that you check this page occasionally for updates: <https://www.north-norfolk.gov.uk/ppworkingparty>

The next opportunity to submit potential alternative sites, and to comment on the Council's proposed strategy for development, will be during the anticipated formal consultation period next year. We will write to notify you when consultation dates have been set and also to provide information on how to submit comments.

Continued....

Stage 1b Consultation Evidence F

It is our intention that all those promoting sites through the Local Plan are included on the Local Plan Consultation Database, which ensures you are notified of the key stages of Plan preparation, typically via our newsletter. We will assume that your permission is given unless you notify us otherwise.

Should you have any questions do not hesitate to contact us at planningpolicy@north-norfolk.gov.uk.

Yours sincerely,

Chris Brown
Project Support Officer (Planning Policy)
01263 516318
planningpolicy@north-norfolk.gov.uk
www.north-norfolk.gov.uk/localplan

F Stage 1b Consultation Evidence

F.2 Website Consultation Information

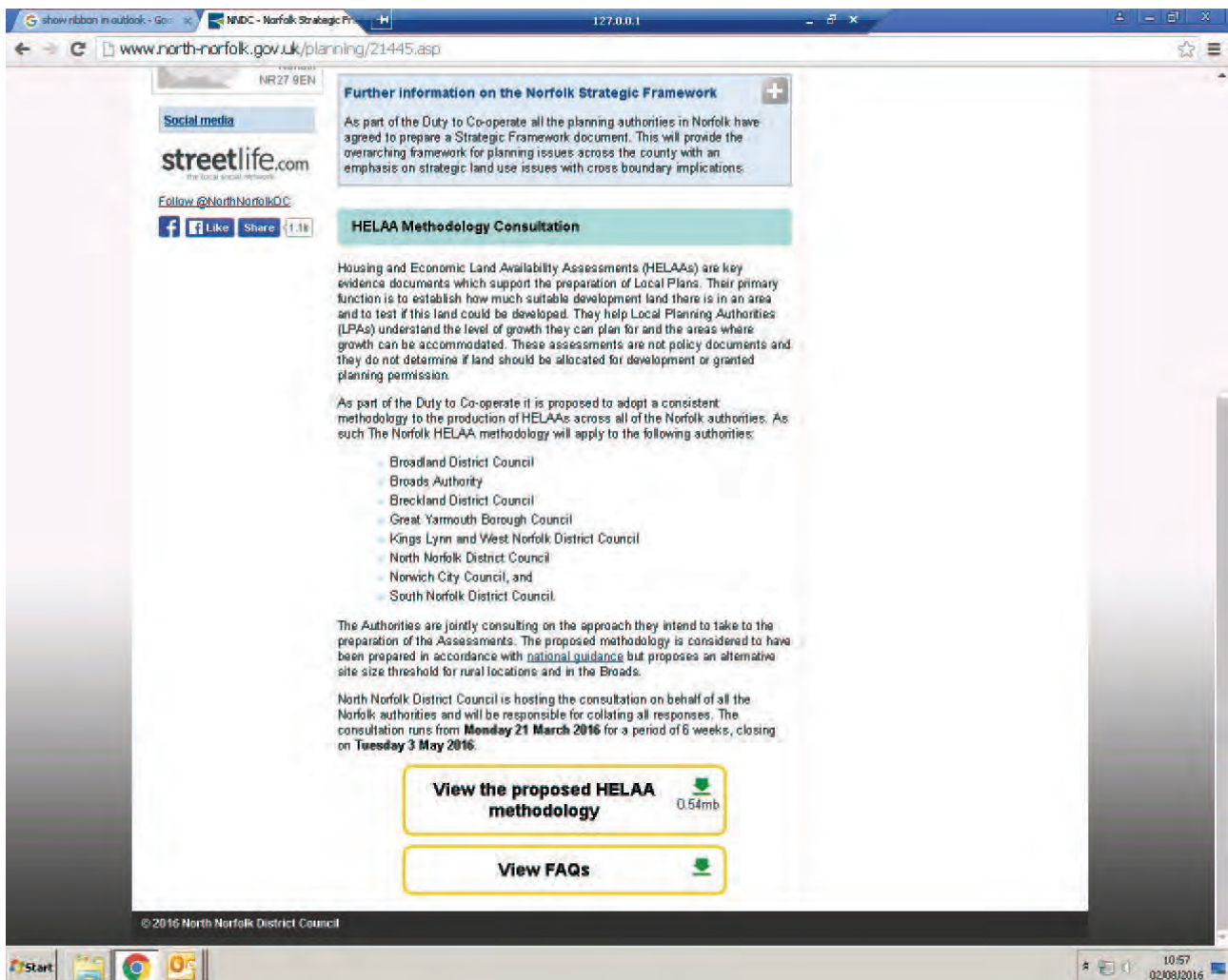



Figure 22 HELAA Website Consultation (2 August 2016)

Stage 1b Consultation Evidence F

F.3 Consultation Response Form



Consultation Response Form

This consultation runs from Monday 21 March 2016 until Tuesday 3 May 2016. Please ensure all responses are returned by 5pm on the closing day.

Please return to North Norfolk District Council no later than 3 May 2016

By Email: planningpolicy@north-norfolk.gov.uk
 By Post: Planning Policy, Council Offices, Holt Road, Cromer, Norfolk, NR27 9EN

The responses received as part of the consultation may be published by any of the Norfolk authorities. By submitting this form you are consenting to your personal details being stored by each of the Individual Councils and used in accordance with the Data Protection Act. Only the content of your response, including your name or organisation, may be published.

Further advice and guidance can be obtained by visiting the North Norfolk District Council Website (www.north-norfolk.gov.uk/localplan/) or by contacting the planning policy team directly on 01263 516325.

1. Your Contact details (required)

Title (Mr/Mrs/Ms/Miss): First name: Surname:

Organisation (if applicable):

Address:

Postcode:

Email: Telephone:

OFFICE USE ONLY

<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>

The Housing and Economic Land Availability Assessment (HELAA) methodology has been prepared in accordance with the guidance in the National Planning Practice Guidance (NPPG). As such, this consultation relates only to those areas which are not specified in the Guidance.

Identification of sites and broad locations

Question 1:
Do you agree with the sources of sites listed at paragraph 2.2 of the proposed HELAA methodology?
 Yes No

If you answered no, what other sources of sites should be included?

Question 2:
Do you agree with the proposed site size thresholds as set out in paragraph 2.4 - 2.6 of the proposed HELAA methodology?
 Yes No

If you answered no, do you think the site size thresholds as set out in the NPPG should be adopted in all locations?
 Yes No

If you answered no, what site-size threshold(s) should be adopted?

Question 3:
Do you agree with the criteria being suggested to automatically excluded a site from the suitability testing as set out in paragraph 2.7 of the proposed HELAA methodology?
 Yes No

If no, what other criteria should be used?

F Stage 1b Consultation Evidence

The image shows a consultation response form with six questions. Each question has a text input area and a 'Yes'/'No' radio button selection. Questions 4, 5, and 6 are grouped under the heading 'Calculating development potential'. Questions 7, 8, and 9 are grouped under 'Assessment of Suitability'. Question 9 includes a 'Further comments' section with a larger text input area.

Calculating development potential

Question 4:
Do you agree with the proposed method to calculate development potential for housing schemes as set out in paragraphs 2.12 to 2.15?
Yes No
If no, why not?

Question 5:
Do you agree with the proposed method to calculate development potential for employment land as set out in paragraph 2.16 - 2.17?
Yes No
If no, why not?

Question 6:
Do you agree with the proposed method to calculate development potential for town centre uses as set out in paragraph 2.18?
Yes No
If no, why not?

Assessment of Suitability

Question 7:
Do you agree with the list of 'constraints' and 'impacts' at paragraph 2.19 of the proposed HELAA methodology?
Yes No
If no, what other constraints and/or impacts should also be included, or which should be removed from the assessment, and why?

Question 8:
Referring to Appendix A of the proposed HELAA methodology, please add below any comments you may have on the 'red', 'amber' and 'green' criteria relating to each of the identified constraints/impacts?

Windfall assumptions

Question 9:
Do you agree with the assumptions that will be made when assessing the potential for development from 'windfall' sources?
Yes No
If no, why not?

Further comments
Please use the box below to make any further comments on the proposed HELAA methodology.

Figure 23 HELAA Methodology Consultation Response Form

Stage 1b Consultation Evidence F

F.4 Update letter to agents, developers and landowners

21 July 2017



Dear Sir or Madam ,

**Publication of new Housing Land Assessment /
Selection of sites for development**

The Council has recently published a **Housing & Economic Land Availability Assessment (HELAA)** which can be found at www.north-norfolk.gov.uk/helaa

Part 1 of this assessment provides details of potential housing development sites in North Norfolk which are drawn from a number of sources, including the sites suggested to us via the 'Call for Sites' process which we undertook last year.

The HELAA concludes that there is sufficient residential development land across the district to accommodate the identified housing need across the Plan period 2016-36.

As this document is a capacity study it **does not make any decisions** about which sites will be released for development via allocation in our new Local Plan. It does however include an initial site appraisal process which gives a broad indication in relation to our current assessment of site suitability.

In the next few months we will commence the detailed assessment of the options that are available and reach decisions about which sites should be identified as preferred development sites for consultation in a Draft Plan. To complete this work we will rely on the information which is available including any details which you may already have submitted via the Call for Sites process.

The information included in the HELAA may indicate areas of concern but which might be capable of being addressed **if supporting evidence can be provided**. For example, in preparing the Assessment we have consulted with the Highway Authority who may have raised concerns about the suitability of the local highway network or site access. These concerns may be capable of being addressed if highway improvements are made as part of a proposal, or access details confirmed. If land is dependent on third party access then we would encourage land owners and promoters to confirm that there is an agreement in place to allow development to commence (if allocated).

If you wish us to take any further information into account it is important that this is provided by no later than Friday 29th September, and sent to:

Continued....

HELAA - Publication update to agents, developers and landowners

F Stage 1b Consultation Evidence

planningpolicy@north-norfolk.gov.uk

Planning Policy Team, NNDC, Holt Road, Cromer, NR27 9EN

The HELAA identifies sites which could collectively deliver many thousands of dwellings and consequently only a small proportion will need to be allocated for development in the new plan. Although the locations where new housing growth will be focussed will not be agreed for some time, at this stage it is considered highly likely that the majority of future development sites will be identified close to one of the Districts seven towns and a small number of the larger villages which offer a range of services to meet daily needs.

If you have not already done so you may wish to contact us to discuss the prospects of a site being identified for allocation with the Planning Policy Team before undertaking and supplying any further work to aid the detailed stage of the site selection process.

We are writing to you because you are included on the North Norfolk Local Plan Consultation Database as a Planning Agent, Developer or Landowner. If you no longer wish to receive communications from us please send your request to the above email address.

Yours sincerely,

Mark Ashwell DipTP MRTPI
Planning Policy Manager
01263 516325
mark.ashwell@north-norfolk.gov.uk
www.north-norfolk.gov.uk/localplan

Figure 24 HELAA - Publication update letter to agents, developers and landowners

Stage 1b Consultation Evidence F

G Stage 1c Consultation Summaries

Appendix G: Stage 1c Consultation Summaries

Venue	Cromer Town Workshop
@NNDC Offices, Cromer, 2 June 2016, 6pm	Strengths: Community spirit, Seaside/promenade, opportunities for walking and close proximity to other attractions / towns such as Cromer Zoo, golf opportunities & Sheringham and Holt. The historic town centre and independent shops, good transport links and the attractiveness of the surrounding area.
	Weakness: Congestion and the routing of the main road through the town along with limited parking especially towards the east and inadequate utilities. Increased pressure on residential on street parking. Limited affordable housing for young families. Quality/value of local job opportunities including some dependence on seasonal work. Lack of indoor tourist activities. Limited availability of GP services and No A&E at hospital. Limited development potential to the south of the town. Mobile / Internet coverage. Limited range of town centre shops combined with lack of retail space.
	Opportunities: High quality job provisions, improved play areas indoor tourist facilities alone with Green Infrastructure for cyclists and walkers. Improved traffic circulation, provision of a petrol station, more affordable housing for working families and improved health facilities. More balanced retail provision. Improved Hotel provision and the opportunities for more investment into improving local fishing stocks.
	Threats: Coastal erosion, ageing population lack of available workforce, increased traffic congestion, loss of open space, lack of investment into green space / play equipment, limited opportunities for housing. Loss of tourist accommodation (B&B's) to housing, capacity constraints at schools.
Venue	Fakenham Town Workshop
@Fakenham Connect, 19 May 2016, 6pm	Strengths: Job opportunities, land availability, the range of sports facilities and club provision, along with accessibility and access to quality countryside and nearby tourist attractions including the North Norfolk Coast.
	Weakness: Lack of available and suitable housing for all types in particular larger family and executive homes. Lack of comparison retail choice, local public transport to surrounding villages, lack of rail link, reliance on low paid employment and risks of there being only 3 large employers in town, high shop rates and rents. Environmental constraints to the south of town (River Wensum).
	Opportunities: Increased local employment facilitation through land allocation, development of brownfield sites / redevelopment and the availability of suitable land for appropriate growth in residential market and employment. North Norfolk Railway extension, tourism growth, car parking improvements including the facilitation of a coach park, provision of swimming pool, Increase the housing base, and widen the type of homes available to include executive and larger family homes as well as affordable homes and increased connectivity to local green corridors and tourist attraction such as Pensthorpe Natural Park. There remains an opportunity to improve the housing stock in relation to higher standards and lower running costs associated with modern building standards and the opportunity to attract further economic investment both in employment facilitation but in town centre offer.
	Threats: There was some concern expressed around the reliance on a small number of larger employers and how external business decisions could impact on the town, and its attempts to attract greater inward investment including employment growth and service/leisure provision. The view that the continuation of the provision of lower end housing especially rented housing rather than balanced growth and high quality stock improvements coupled with the the lack of ambition was also seen as a potential treat.
Venue	Holt Town Workshop
@Holt Community Centre, 23 May 2016, 6pm	Strengths: High quality, accessible town scape and character, strong independent retail mix, tourist economy, low crime, access to open space surrounding country parks, bus service, primary school provision and sheltered housing.

Stage 1c Consultation Summaries G

	<p>Weakness: lack of retail choice/mix to cater for all needs, lack of employment opportunities (land and career), single land ownership employment), lack of secondary school and capacity issues at primary school, high house prices, poor bus services, monopoly in terms of petrol provision, poor distribution of children's play facilities and lack of adult/older children facilities, inadequate and poorly connected car parking for those employed as well as visitors.</p> <p>Opportunities: relocation and larger primary school, budget hotel provision and relocation of the petrol station to allocated land on the edge of the town and main link road. Increased local employment facilitation through land allocation, and the availability of suitable land for appropriate growth in residential market.</p> <p>Threats: There was some concern expressed around the potential for increased out of town retailing, the retention ability of the town with regards younger, economically active workforce and the growing trends for business decisions / investments to be made by others who had no connection to the town along with the perceived threat of a lack of employment opportunities. The potential for increased congestion and the lack of car parking combined with poor public realm, narrow/restrictive public footpaths and the continued growth in second homes and holiday lets were put forward as impacting on the town centre trade now and in the future.</p>
Venue	Hoveton Village Workshop
@Hoveton Village Hall, 30 June 2016, 6pm	<p>Wroxham Parish Council and associated District Councillors, the Broads Authority and Broadland DC were invited so as to obtain a collective and whole settlement view towards the identification of the issues and opportunities that the emerging Local Plans should consider. On the day only members of Hoveton Parish Council / District Cllr and officers of the Local Planning Authorities were able to make the meeting. The workshop content was altered with the commitment to undertake the workshop exercises at a later date.</p> <p>Discussions around potential future growth. Recognised in discussions that the settlements of Hoveton and Wroxham should be looked at as a whole and that villages should not be seen as potential locations to accommodate overspill from Norwich but as destinations in their own right and developed recognising links between employment growth and housing development. Issues raised include impact on services resulting from being a tourism destination, increased traffic and congestion, policies should seek to encourage a mix of shops and improvements to the retail offer, the importance of improvements around the railway line, reference to specific sites, concerns about the impacts of an ageing population and inadequate health care (GP and A&E).</p>
Venue	North Walsham Town Workshop
@North Walsham Town Council Offices, 10 May 2016, 6pm	<p>Strengths: Transport links to Norwich / Public transport, education provision, heritage and the built environment (including the availability of open space and access to leisure provision, such as swimming, football and rugby clubs). The strategic location of the town.</p> <p>Weakness: Poor town centre retail offer including small size of units and poor public realm, transport restrictions (low bridges), pressure on services such as health. Lack of further education facilities. Only one petrol station, flooding.</p> <p>Opportunities: Improved access and road network, provision of bus terminus, increased tourism, out of town retail park. Availability of land, town centre improvements including public realm.</p> <p>Threats: Capacity issues brought about through insufficient infrastructure funding (health, road, education), lack of joined up approach, incremental growth not delivering benefit through S106 agreements. Loss of further town centre retail particularly to residential. Lack of development.</p>
Venue	Sheringham Town Workshop
@Sheringham	Strengths: Seafront, coast, green spaces and the physical & natural environment, schools, community spirit, good road, rail and public transport links, good recreational & tourist facilities

G Stage 1c Consultation Summaries

<p>Community Centre, 24 May 2016, 4pm</p>	<p>/ access to the open countryside, vibrant town centre, a steady influx of tourists through the supply of holiday homes and surrounding caravan parks. The strong community spirit and community services as demonstrated through high number and quality of local events.</p> <p>Weakness: Lack of local employment for youngsters, lack of employment opportunities / investment / prevalence of low paid seasonal jobs. Reducing roll of the High Street and the towns' service centre function through the loss of retail services, and declining breadth of retail establishments. Poor public realm, including signage. Increased proportion of over 65s, coupled with long waiting lists at Doctors/poor ambulance response times and lack of both suitable and reasonably priced market and affordable housing.</p> <p>Opportunities: Increased local employment facilitation through land allocation and development of brownfield sites. Increased supply of affordable housing for local people improvements to infrastructure including the provision of a ticket machine for the railway and a roundabout off the A148. Public realm improvements through pedestrianisation leading to investment and a broader depth of retail and restaurant provision. Cemetery extension and green burial site. Broadband and mobile phone improvements.</p> <p>Threats: Growth without appropriate provision and investment in services. Potential Impacts of larger retailers and the further decline of the high street through increase in charity shops and closure of retail services. Loss of employment land and potential impacts on the existing character and landscape values which contribute to the place setting of Sheringham. Coalescence of Sheringham with Upper Sheringham holiday homes, ageing population, lack of potential development sites, pedestrianisation and development on top of Holway Road.</p>
<p>Venue</p>	<p>Stalham Town Workshop</p>
<p>@Stalham Town Hall, 17 May 2016, 7pm</p>	<p>Strengths: Community spirit, countryside location, commutable to Norwich – good road links, good education and recreational facilities / access to the open countryside.</p> <p>Weakness: Lack of local employment for youngsters and lack of employment opportunities / investment. Reducing roll of the High Street and the towns' service role through the loss of bank services to North Walsham. Poor off peak public transport, prominent undeveloped brownfield sites. It was also thought that the A149 separated the town from the Broad's Area.</p> <p>Opportunities: Increased local employment facilitation through land allocation and development of brownfield sites. Increased supply of affordable housing for local people improvements to infrastructure identified included the removal of the mini roundabouts on Yarmouth / Ingham Road and A149 / Old Market Road Junction. Bringing derelict sites back into use to improve Stalham's overall attractiveness and improving access to the recreation ground.</p> <p>Threats: Sale of affordable housing, in particular social rented properties. Further decline of the high street and in local business'. Not enough growth could lead to stagnation while too much and or the "wrong sort" could erode community spirit and cohesion. There was some concern expressed around the willingness to improve the public realm, the opportunities for investment and the continued decline in retail provision on the High Street.</p>
<p>Venue</p>	<p>Wells-next-the-Sea Town Workshop</p>
<p>@Wells Community Hospital, 16 May 2016, 2pm</p>	<p>Strengths: Education provision, heritage and the built environment (including the availability of open space and access to service and leisure provision). Strong local community, opportunities for tourism and local rich landscape.</p> <p>Weakness: Limited supply of appropriate housing (affordable) - type and tenure, high proportion of second homes, parking congestion at peak times and lack of local petrol station, shortage of suitable employment land, seasonal employment opportunities including impact of low wages.</p> <p>Opportunities: Increased local employment facilitation through land allocation and development of Maryland Area. Increased supply of affordable housing for local people; in particular rented properties. Delivery of a Heritage Centre, traffic management in the town including improved road links to Fakenham, residential parking permits, and controls on design and character of proposals.</p>

Stage 1c Consultation Summaries G

Threats: Erosion of the character of Wells, housing development serving the wider area and beyond including in second home ownership missed, opportunities for local employment provision, excessive infill resulting in a threat to Local Green Infrastructure and a wider development threat on the character of the AONB. It was recognised that the population was ageing which in turn could impact on the community and its services. It was also recognised that the growth in tourism brought with it benefits as well as negatives and that planning had a role to play.

Table 33 Key messages from the Town / Parish Council SWOT analyses

H Stage 1d Consultation Summaries

Appendix H: Stage 1d Consultation Summaries

Stage 1d Consultation Summaries H

DRAFT Sustainability Appraisal Scoping Report Schedule of Comments (consultation period 10 October 2016 – 21 November 2016)

Questions asked:

1) Identification of other Relevant Policies, Plans and Programmes and Sustainability Objectives

- a. Are there other documents specifically relevant to the single Local Plan that we should take into account?
- b. Have we adequately taken account of those listed?

2) District 'Baseline' Information and Key Sustainability Issues and Problems

- a. Can you suggest (or provide) any other relevant information?
- b. Have we identified the main sustainability issues relevant to the single Local Plan?

3) Sustainability Objectives and Appraisal Questions

- a. Do you agree with the objectives and questions we have identified?
- b. What additional decision making criteria do you think are relevant to the SA of the Single Local Plan, (overall strategic /policy assessment and site appraisal)

4) Sustainability indicators

- a. We welcome your comments on our initial ideas for indicators and data sources as well as suggestions for others. These should be appropriate for the assessment of particular development sites and policies.

H Stage 1d Consultation Summaries

Summary of Comments / Issues Raised (including page / paragraph number)	Council Response and Action / Recommendation
<p>Member of the Public (ref: DSR01)</p> <ul style="list-style-type: none"> Air pollution is an important environmental issue and should be mentioned (para. 1.5). Does not mention failure to meet 2010 air pollution limits. Accepted that North Norfolk does not have any Air Quality Management Areas, but that is not to say it won't in the future with traffic growth (para. 6.2.2.15). 	<ul style="list-style-type: none"> Agree. Whilst air quality is identified as a specific consideration, the following has been added to the Executive Non-Technical Summary for clarity: 'The SA will need to consider the impact of development on air quality and pollution, including water, noise, light, odour and land contamination'. Noted. No action recommended. North Norfolk has met all of the national air quality objectives. It is recognised that future development has the potential to impact on air quality and it is considered that the issue can be adequately covered as an 'issue and problem' and within the SA Framework.
<p>Member of the Public (ref: DSR02)</p> <ul style="list-style-type: none"> SA should consider how the Council may be able to improve the sustainability of local villages to overcome reliance on motor vehicles and provide better access to public transport. Specifically mentions Worstead. House building along with amenities and other local employment designations promoted between village and railway station to help overcome housing shortages. Hopes that the SA will promote this sort of thinking as a general principle. Pre-existing public transport link is being vastly under-utilised and a pro-active approach could unlock potential for the benefit of the local population and the wider environment. 	<ul style="list-style-type: none"> Noted. No action recommended. The SA Framework will allow the assessment of different policy options, including those around spatial distribution of development and the sustainability of settlements. As above.
<p>Broads Authority (ref: DSR03)</p> <ul style="list-style-type: none"> Dark Skies- Link provided to Broads Authority Dark Skies Study (2016) and a further assessment which compares CPRE data (para. 6.2.2.19). Landscape- No mention of the Broads which is a nationally protected landscape. Refer to Broads Landscape Character Assessment and Landscape Sensitivity Study (pp 43). 	<ul style="list-style-type: none"> Noted. No action recommended. The Broads Authority Study covers the Broads Authority administrative area only. The SA Scoping Report references the CPRE light pollution and dark skies maps within North Norfolk. Agree. The following has been added into Task A2 of the Landscape, Townscape & the Historic Environment Chapter: 'The east of the District surrounds and provides the gateway to the Broads; an area of internationally recognised wetlands. The Broads Authority is the Local Planning Authority for the Broads Area and Broads Plans apply

Stage 1d Consultation Summaries H

<ul style="list-style-type: none"> • Archaeology- Historic England has identified the Broads as an area of <i>exceptional waterlogged heritage</i>. • Dwelling Need- Suggest mention that there is an element of North Norfolk's need that is being met by the Broads and give some details (Table 9). • Land, Soil and Water Resources-Consider the wording in the following is weaker than the other two bullet points in this section which say words like 'need to' and 'protect'. Water quality is essential to the Broads: <i>'The impact of new development on water supply capacity, sewage networks, waste water treatment works and receiving water courses should be considered as should the incorporation of water conservation measures to protect water resources.' (Chapter 7)</i> • Suggests the word 'consider' is not needed in the following: <i>'Climate change is expected to have significant and wide-reaching impacts. There is a need to consider addressing climate change mitigation and adaption as a cross-cutting issue' (Chapter 7).</i> • As above, the term 'consider' reduces the importance of the following: 	<p>there. A hyperlink would also be included to the Broads Authority Planning webpage.</p> <ul style="list-style-type: none"> • Agree. The following has been added into Task A2 of the Landscape, Townscape & the Historic Environment Chapter: '...and the Broads, designated by Historic England as a Site of Exceptional Waterlogged Heritage'. • Clarify. The following has been added to Task A2 of the Housing Chapter: 'The figure also includes dwellings identified as being needed in the Broads Area (accounting for 95 dwellings over the period 2012 – 2036) (Strategic Housing Market Assessment, ORS, 2016a, p.133). Table 9 illustrates the updated position included within the 2017 SHMA, with the requirement for North Norfolk being 8,581 between 2015 - 2036 (ORS, 2017, p.95). Over the same period, the updated dwelling need within the Broads Authority Executive Area has been identified as accounting for 70 dwellings over the period 2015 – 2036) (ORS, 2017, p.96).' Dwelling need identified is also part of the existing OAN for North Norfolk as identified by the SHMA. • Noted. No action recommended. It is suggested that Task A3 is identifying an issue / problem that will need to be considered within the SA Framework. • Noted. SA Objective SA3 has been added to the Land, Water and Soil Resources. See also associated Decision-Making Criteria 3b. • Agree. Addressing climate change is one of the core land-use planning principles outlined in the NPPF. The word 'consider' has been deleted.
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H Stage 1d Consultation Summaries

<p><i>'The need to ensure that the impacts of pollution (including water, noise, light and odour) are suitably considered and addressed, with consideration given to pollution being a cross-cutting issue (for example there are potential impacts on the natural environment and health)' (Chapter 7).</i></p> <ul style="list-style-type: none"> • Typo in the following issue / problem: 'How to balance development with protecting and enhancing enhance the District's landscape/seascape/townscape character' (Chapter 7). • Waste objective: <ul style="list-style-type: none"> ○ Minimising sterilisation of minerals and remediate contaminated land does not have related decision making appraisal questions (Table 14). • Climate Change objective: <ul style="list-style-type: none"> ○ Questions if flood risk should be mentioned in an SA objective; whilst climate change could make flooding worse, there is flood risk in existence in the first place to be made worse by climate change. ○ Questions whether the decision-making question relating to contaminated land should be in the first objective. ○ Reference made to the Broads Authority Dark Skies Study 2016; one of the darkest areas of the Broads is around Hicking and would welcome a site allocations decision-making question relating to light pollution (Table 14). • Landscape Objective: 	<ul style="list-style-type: none"> • Noted. No action recommended. It is suggested that Task A3 is identifying an issue / problem that will need to be considered within the SA Framework. • Agree. The word 'enhance' has been deleted. • Agree. See Decision-Making Criteria 2b on mineral resources. • Noted. No action recommended. Contaminated land is covered in the Objective on Climate Change, Energy, Air Quality and Pollution. • Noted. No action recommended. The addition of a separate objective would result in duplication in the assessment. It is considered that decision-making appraisal questions (including those for Site Allocations) can reasonably allow for this to be considered. • Noted. Land contamination is covered in the 'Climate Change, Energy, Air Quality and Pollution' Chapter. The reference to land contamination has been put under the 'Climate Change, Energy, Air Quality and Pollution' Sustainability Appraisal Objective/s column. • Noted. No action recommended. The Broads Authority Study covers the Broads Authority administrative area only. The SA Scoping Report references the CPRE light pollution and dark skies maps within North Norfolk. • Agree. Decision-Making Criteria 5b on pollution and Site Specific Decision-Making Question 5b have been added to include light pollution. • Agree. SA Objective SA8 has been amended to incorporate settings.
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Stage 1d Consultation Summaries H

<ul style="list-style-type: none"> ○ Not just within the area, but the setting of landscapes outside the area is important. In particular development on the edge of the Broads can impact the setting of the nationally designated landscape. Would suggest the objective becomes '<i>respect and enhance the variety of landscape types in and near to the area and protect, and where appropriate, enhance the historic environment.</i>' ○ Would welcome specific mention of the Broads (as well as AONB and coast) in the decision making questions. ○ The first Decision-Making Appraisal Questions for Site Allocations for this objective refers to landscape but the related decision making criteria (+, -, 0) relate to heritage (repeated from heritage section further down page) and not landscape. (Table 14). ● Housing objective: <ul style="list-style-type: none"> ○ Would question whether an allocation not being for housing is a negative (in relation to the + and - column). May allocate open space, local green space, employment, retail etc. and those would be rated negatively. Suggest the negative is actually a zero and there is an extra Decision-Making Appraisal Questions for Site Allocations that relates to the location of housing as this is included in the SA objective. Could be along the lines of being close to services and facilities (Table 14). ● Employment objective: <ul style="list-style-type: none"> ○ Some Decision-Making Appraisal Questions for Site Allocations do not have a linked 'no' option. Perhaps no is 0 like the suggestion for housing above. There could be scope for a - as well (Table 14). ● Travel objective: <ul style="list-style-type: none"> ○ There is a Decision-Making Appraisal Questions for Site Allocations relating to education. Is this a facility or service? Is this meant to be with the employment objective (Table 14)? 	<ul style="list-style-type: none"> ● Noted. No action recommended. It is considered that the decision-making questions need to be broad enough to cover all designations, not just the Broads, the AONB and coast). ● Agree. Amended. ● Clarify. Allocations not contributing towards housing provision would give a neutral response, rather than a negative. ● Noted. No action recommended. Access to services and facilities is included in the Infrastructure and Accessibility section. ● Clarify. A neutral option has been added to the relevant employment response for clarity. ● Noted. Access to education will be considered under the Economic Activity and Education Objective. ● Agree. Repetition has been removed.
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<ul style="list-style-type: none"> o Each table has 'international' in the title (Appendix A). Suggests that the following documents are relevant to North Norfolk: <ul style="list-style-type: none"> ▪ Broads Landscape Character Assessment ▪ Broads Landscape Sensitivity Study ▪ Broads Biodiversity and Water Strategy ▪ Broads Integrated Access Strategy (2013) ▪ Broads Authority Biodiversity Action Plan and Framework (2009) ▪ Sustainable Tourism in the Broads (2016) ▪ The Broads LAG Local Development Strategy 2014 – 2020. ▪ Broadland Catchment Plan. Broadland Catchment Partnership (2014) ▪ Broads Climate Change Adaptation ▪ Draft Broads Plan (Appendix A) 	<ul style="list-style-type: none"> • Noted. It is recognised that the District is affected by external as well as internal influences and various work has/will be carried out under the Duty to Cooperate. Neighbouring authorities are consultees for consultation purposes. Reference to neighbouring authorities' plans will be added to Appendix A for consideration as relevant, although they will not be specifically listed.
<p>Marine Management Organisation (ref: DSR04)</p>	
<ul style="list-style-type: none"> • Pleased to see reference to marine plans and associated documents and hope that information is carried over into the Local Plan. • Would caution on simply using the marine plans to consider cross-cutting environmental issues, although they are highly important. Would encourage looking at how the Local Plan could benefit sustainable marine business and how marine and terrestrial plans can work together regarding coastal change. 	<ul style="list-style-type: none"> • Noted. No action recommended. • Noted. No action recommended.
<p>Forestry Commission England (ref: DSR05)</p>	
<ul style="list-style-type: none"> • Summary of Government Policy on ancient woodland provided: <ul style="list-style-type: none"> o Section 40 of Natural Environment and Rural Communities Act 2006; o Para. 118 of the NPPF (2012); o Natural Environment Guidance in the National Planning Practice Guidance (2014), including the guidance on the Forestry Commission's role and including noting that ancient woodland is an irreplaceable habitat; 	<ul style="list-style-type: none"> • Noted. No action recommended. The Act has been identified within Task A1 and Appendix A. • Noted. No action recommended. The NPPF has been identified within Appendix A. Para. 118 has not been specifically mentioned. Para. 118 relates to the determination of planning applications. • Noted. No action recommended. Task A1 recognises that the NPPF is supported by accompanying guidance contained within the Planning Practice Guidance, as does Appendix A. A link to the Planning Practice Guidance is contained within Appendix A.

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<ul style="list-style-type: none"> o Standing Advice for Ancient Woodland and Veteran Trees (2014); o Pp. 24 of The UK Forestry Standard (3rd edition, 2011); o Pp. 10 of the Keepers of Time – A Statement of Policy for England’s Ancient and Native Woodland (2005); o Para 2.53 and 2.56 of the Natural Environment White Paper ‘The Natural Choice’ (2011), and; o Para. 2.16 of Biodiversity 2020: a strategy for England’s wildlife and ecosystem services (2011). • Information provided on the Forestry Commission’s work in relation to renewable and low carbon energy and climate change, local market growth, enabling woodlands to be brought back into active management, flood risk and encouraging local authorities to consider the role of trees in delivering planning objectives as part of a wider integrated landscape approach (e.g. green infrastructure and locally sources wood). 	<ul style="list-style-type: none"> • Noted. No action recommended. This advice is a material consideration in the determination of appropriate planning applications. • Noted. No action recommended. As above. • Noted. No action recommended. As above. • Noted. No action recommended. The document has been identified within the relevant Task A1 and Appendix A. • Noted. No action recommended. The document has been identified within the relevant Task A1 and Appendix A. • Noted. No action recommended.
<p>Anglian Water (ref: DSR06)</p>	
<p>Land, Soil and Water Resources</p> <ul style="list-style-type: none"> • Suggests reference to quotes originating from the Anglian Water’s Water Resources Management Plan 2015 (paras. 6.1.2.9, 6.1.2.10 & 6.2.2.17). • Wastewater treatment works are now known as water recycling centres (paras. 6.1.2.11, Task A3, bullet point 3 & 7.0.1). • Supports the recognition that the district is within a water stressed area and hopes that this issue is addressed in the Local Plan by requiring the optional building regulations of 110 litres per person per day within policy (para. 6.1.2.8). • Supports the reference to a forthcoming Water Cycle Study. 	<ul style="list-style-type: none"> • Agree. The author, year and page number are already referenced in all three paragraphs, with the Appendix providing additional details (including the document title). The title has been added to the specific paragraphs. • Agree. Amended. • Noted. Decision-Making Criteria 3a on water consumption has been added. No Site Specific Decision-Making Question has been included, however, as it is considered that it is development specific. • The Council has worked with Anglian Water and EA in order to identify the network and any waste water recycling centre capacity issues through the NSF/Duty to Cooperate. In addition, site specific

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<ul style="list-style-type: none"> • Climate Change, Energy, Air Quality and Pollution: <ul style="list-style-type: none"> ○ A strategic flood risk assessment (SFRA) should be included within the list of key policies, plans and programs as it should be used to inform the SA. Advises that the 2008 strategic flood risk assessment is updated; ○ Suggested that an additional bullet point is added to stress the effect climate change could have on water scarcity (para. 6.2.2.1); ○ Welcomes the inclusion of sustainable drainage systems and the recognition that this will be included in future local plan policies (para. 6.2.2.25), and; ○ Appreciates the reference to sewer flooding in Task A3 as there is a need to consider the potential risk of flooding including within the foul drainage network (para. 6.2.3); • Housing: <ul style="list-style-type: none"> ○ No mention of how critical it is that infrastructure, including water, is provided alongside housing to ensure sustainable growth (para. 6.6.3). • Infrastructure and Accessibility: <ul style="list-style-type: none"> ○ Suggested that the title of this section is changed to Transport and Accessibility as it deals with the road network and transport. This would 	<p>information direct from Anglian Water has informed the site selection process.</p> <ul style="list-style-type: none"> • Agree. Add SFRA to relevant Task A3 and Appendix 1 and note that an updated SFRA 2017 has been completed. • Noted. No action recommended. The information provided is quoting information provided within a specific document. The designation of the Anglian region as an area of serious water stress is discussed in the Land, Soil and Water Resources section and 'The impact of new development on water supply capacity, sewage networks, water recycling centres and receiving water courses should be considered as should the incorporation of water conservation measures to protect water resources' is identified as a key issue within the section. Water stress will be covered in the development of the SA. • Noted. No action recommended. It is considered that the SA Framework will allow the assessment of different policy options, including those around SUDs. • Noted. No action recommended. • Clarify. The following has been added as an issue & problem within Housing Task A3: 'There is a need to ensure that housing provision is supported by appropriate infrastructure'. A similar addition has been added to the Economic Activity and Education chapter. • Clarify. The Infrastructure and Accessibility chapter does not deal only with the road network and transport. The table has been updated to refer to 'Infrastructure and Accessibility'.
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<ul style="list-style-type: none"> • Noted. No action recommended. 	<p>then correspond with 7.0.1 Table of complete list of Sustainability Issues and Problems (Chapter 6.8, Task 3).</p> <ul style="list-style-type: none"> • It is assumed that proposals will be able to make appropriate and timely provision for the necessary supporting infrastructure (Table 14).
<ul style="list-style-type: none"> • Agree. The 'Secured by Design' document has been added to Task A1 of the Health and Inclusive Communities chapter and Appendix A. • Agree. An additional Issue and Problem has been added to the Healthy and Inclusive Communities topic to include 'The need to consider reducing crime and the fear of crime.' Decision-Making Criteria 11a and Site Specific Decision-Making Question 11a on crime and the fear of crime has been added. 	<p>Norfolk Police (ref: DSR07)</p> <ul style="list-style-type: none"> • Recommends further inclusion of the need and importance of a safe and secure external environment and the role of Police advice in delivering this (specifically in the form of the Secured by Design (SBD) initiative). Although crime figures are mentioned in Section 6.5 Healthy & Inclusive Communities / Deprivation and Inequality, examination of the report resulted in no further inclusion of the need and importance of a safe and secure external environment and the role of Police advice in delivering this over the past 25 years specifically in the form of the Secured by Design (SBD) initiative. The NPPF, NPPG, Scottish Planning Policy – PAN 77 Planning Policy Wales – TAN 12 have sought to reinforce the need of safe & secure environment and there are specific references to Police service advice and the Police.uk website. (Chapter 6.5). The Police service places great importance on the need to build sustainable communities and to raise awareness of the significant impact that low crime makes to the long term sustainability of a development. Outlines the benefits found by research and findings in terms of a significant reduction in crime and cost efficiency savings for a wide range of stakeholders, including local authorities, housing associations, landlords, residents and the Police service. • The importance of crime prevention to reduce the opportunity for crime and the fear of crime, creating safer, more secure and sustainable environments should be acknowledged within the Social and Economic Sections: 6.4- Landscape, Townscape & The Historic Environment (para. 6.4.3 (Task 3)), and; 6.6- Housing (para. 6.6.1 (Task A1)). • Q1a
<ul style="list-style-type: none"> • Partially agree. There are recognised interrelationships across all strands of sustainable development. Reducing crime and fear of crime has been included as SA Objective SA11. An additional reference within Task A3 of the Healthy and Inclusive Communities Chapter 'The need to consider reducing crime and the fear of crime' has been added, however, it is not considered necessary to specifically acknowledge crime within the other social and economic sections, as there is already a recognition that all of the issues are interrelated. 	

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<ul style="list-style-type: none"> o The Secure by Design Industry Guides should be referenced within relevant sections. • The current NNDC Core Strategy makes specific reference to SBD. 	<ul style="list-style-type: none"> • Agree. The 'Secured by Design' document has been included within Task A1 of the Health and Inclusive Communities chapter and Appendix A. • Noted. No action recommended. The SA Framework will allow the assessment of different policy options, including those around creating safe and secure external environments. 		
Norfolk County Council (ref: DSR08)			
<ul style="list-style-type: none"> • Infrastructure Delivery: <ul style="list-style-type: none"> o Welcomes reference to the need to plan for growth where it can provide growth benefits and sustainable access to services. o Could mention infrastructure delivery in terms of outlining what policies will be in the emerging Local Plan to identify required infrastructure and how it will be funded. o Could have regard to the County Council's most up to date Planning Obligations Standards (updated annually) (chapters 6.5.3 & 6.6.3). • Minerals and Waste (Q1a & Q1b): <ul style="list-style-type: none"> o Pleased to note the inclusion of the Norfolk Minerals and Waste Development Framework (NIMWLDf) is included. o The entry regarding the NIMWLDf in Appendix A should refer to policy CS17 'Use of secondary and recycled aggregates' and policy CS16 'Safeguarding'. Directed to Norfolk County Council published guidance regarding the process to be followed for non-mineral development on Mineral Safeguarding Areas (Appendix A). • Minerals and Waste (Q2a & Q2b): <ul style="list-style-type: none"> o Paragraph 6.1.2.4 refers to waste More detailed information provided in respect of collected municipal waste arising in North Norfolk (2015 calendar year): <table border="1" data-bbox="1204 1176 1233 1904" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 80%;">Total Municipal Waste Recycled - Dry Recycling</td> <td style="width: 20%; text-align: right;">11,276.18</td> </tr> </table> 	Total Municipal Waste Recycled - Dry Recycling	11,276.18	<ul style="list-style-type: none"> • Noted. No action recommended. • Disagree. No action recommended. The purpose of the SA Scoping Report is not to develop policies, instead its purpose is to identify those environmental, social and economic issues that have, or are expected to have, a significant impact on the North Norfolk District and by setting objectives for the new Local Plan to consider. • Noted. No action recommended. It is considered that this is something that will be considered on the submission of relevant planning applications. • Noted. • Agree. Policies CS17 and CS16 have been specifically mentioned within Appendix A. • Noted. Paragraph 6.1.2.4 has been amended to the following: 'In total, 45,470.29 of total municipal waste tonnage was collected in North Norfolk in 2015. Of this, 41.6% is recycled, composted and reused. When household waste only is taken into consideration,
Total Municipal Waste Recycled - Dry Recycling	11,276.18		

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Total Municipal Waste Recycled - Composted	7,600.86	43.34% is recycled, composed and reused (Norfolk County Council, 2016).'
Total Municipal Waste Recycled - Reuse	52.45	
Total Municipal Waste Recycled, Composted and Reused	18,929.49	
Total Municipal Waste Landfilled	25,105.49	
Total Municipal Waste Incinerated with Energy Recovery	260.06	
Total Municipal Waste Incinerated without Energy Recovery	5.92	
Total Municipal Waste sent for RDF	1,169.33	
Total Residual Municipal Waste	26,540.80	
Total Municipal Waste Tonnage (LACW)	45,470.29	
NI 191 (kg/household) Residual household waste per household	438.47	
NI 192 (%) Household waste recycled, composted and reused	43.34%	
Household dry recycling %	24.82%	
Household composted %	18.40%	
Household Reuse %	0.13%	
Household recycled, composted and reuse %	43.34%	
Household EFW %	0.63%	
Household Incinerated w/o EFW %	0.01%	
Household Landfill %	53.48%	
Household RDF %	2.54%	
% Check	100.00%	
Municipal dry recycling %	24.80%	
Municipal composted %	16.72%	
Municipal Reuse %	0.12%	
Municipal recycled, composted and reuse %	41.63%	
Municipal EFW %	0.57%	
Municipal Incinerated w/o EFW %	0.01%	

Draft SA Scoping Report - Schedule of Comments (Consultation 10 October – 21 November 2016)

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<table border="1"> <tr> <td>Municipal Landfill %</td> <td>55.21%</td> </tr> <tr> <td>Municipal RDF %</td> <td>2.57%</td> </tr> <tr> <td>% Check</td> <td>100.00%</td> </tr> </table> <p>(para. 6.1.2.4)</p>	Municipal Landfill %	55.21%	Municipal RDF %	2.57%	% Check	100.00%	<ul style="list-style-type: none"> • Noted. No action recommended. • Partially agree. Suggested that paragraph amended as follows, with the final two sentences excluded as this would need to be a consideration as part of site allocation and policy development, not during the SA Scoping Stage: 'The Norfolk Minerals and Waste Development Framework (Norfolk County Council, 2011a) sets out broad areas where mineral extraction and associated development and waste management facilities will be preferred. Within North Norfolk, the Framework identifies Cromer, Fakenham, North Walsham and Sheringham as locational preferences for waste management facilities. It is recognised, that minerals can only be extracted where they occur. There are existing sand and gravel extraction sites within North Norfolk located at Holt, Beeston Regis, East Beekham and Stody. In North Norfolk, there are adopted mineral site allocations at Aylmerton, Holt, East Beekham and North Walsham. While mineral extraction is a temporary use of land, there is the potential for some loss of land and environmental impact as a result.' • Agree. The amendment has been made as proposed. • Agree. The following has been added into Land, Soil and Water Resources (Task A2) 'As minerals are a non-renewable resource,
Municipal Landfill %	55.21%						
Municipal RDF %	2.57%						
% Check	100.00%						
<ul style="list-style-type: none"> ○ There are a number of existing waste management facilities in North Norfolk. Existing waste management facilities with a capacity of over 20,000 tonnes per annum are safeguarded under M&W Core Strategy Policy CS16. ○ Should be amended as follows: <p><i>'The Norfolk Minerals and Waste Development Framework (Norfolk County Council, 2011a) sets out broad areas where mineral extraction and associated development and waste management facilities will be preferred. Norfolk North Norfolk, the Framework identifies Cromer, Fakenham, North Walsham and Sheringham as locational preferences for waste management facilities. It is recognised, that minerals can only be extracted where they occur. There are existing sand and gravel extraction sites within North Norfolk located at Holt, Beeston Regis, East Beekham and Stody. In North Norfolk, there are adopted mineral site allocations at Aylmerton, Holt, East Beekham and North Walsham. While mineral extraction is a temporary use of land, there is the potential for some loss of land and environmental impact as a result. These potential impacts would be minimised by the policies on working and restoration contained within the adopted Minerals and Waste Plan. There are opportunities for restoration at mineral extraction sites to provide biodiversity and public access enhancement'</i></p> <p>(para. 6.1.2.5)</p> ○ Should be amended as follows: <p><i>'A number of minerals are found in North Norfolk, however, only the sand and gravel resource is safeguarded, as this is the only mineral occurring in North Norfolk which a steady and adequate supply must be planned for. Aggregate minerals (such as sand and gravel) are the main raw materials used by the construction industry' (para. 6.1.2.6).</i></p> ○ Should refer to Mineral Safeguarding Areas and the policy requirements necessary for non-mineral development to be acceptable in these areas in terms of mineral safeguarding. Mineral safeguarding should be included in 	<ul style="list-style-type: none"> • Noted. No action recommended. • Partially agree. Suggested that paragraph amended as follows, with the final two sentences excluded as this would need to be a consideration as part of site allocation and policy development, not during the SA Scoping Stage: 'The Norfolk Minerals and Waste Development Framework (Norfolk County Council, 2011a) sets out broad areas where mineral extraction and associated development and waste management facilities will be preferred. Within North Norfolk, the Framework identifies Cromer, Fakenham, North Walsham and Sheringham as locational preferences for waste management facilities. It is recognised, that minerals can only be extracted where they occur. There are existing sand and gravel extraction sites within North Norfolk located at Holt, Beeston Regis, East Beekham and Stody. In North Norfolk, there are adopted mineral site allocations at Aylmerton, Holt, East Beekham and North Walsham. While mineral extraction is a temporary use of land, there is the potential for some loss of land and environmental impact as a result.' • Agree. The amendment has been made as proposed. • Agree. The following has been added into Land, Soil and Water Resources (Task A2) 'As minerals are a non-renewable resource, 						

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<p>the complete list of sustainability issues and problems in section 7.0.1 (paras. 6.1.3 & 7.0.1).</p> <ul style="list-style-type: none"> • Minerals and Waste (Q3a & Q3b): <ul style="list-style-type: none"> ○ Pleased with the inclusion of the SA objective to 'minimise waste generation, avoid the sterilisation of mineral resources and remediate contaminated land' (Chapter 9). ○ The associated decision making appraisal questions to this objective include: 'Will it contribute to the minimisation of waste production and to recycling?' ○ An additional decision-making appraisal question for the 'Land, Water and Soil Resources' should consider if a site is located on safeguarded mineral resources. The decision making question should be 'Will it sterilise safeguarded mineral resources?' Yes would be negative, No would be positive. It is important that the requirements of adopted M&W Core Strategy Policy CS16, regarding mineral assessment and potentially prior extraction, are considered in reaching a conclusion. The decision-making criteria should be amended to assess whether the site is on a Mineral Safeguarding Area: 'If the site is within a Mineral Safeguarding Area does the proposed site allocation policy consider the requirements of M&W Core Strategy Policy CS16-safeguarding?' Yes would be positive, No would be negative. This would clarify that mineral resource safeguarding plays an important role in sustainable development, which is recognised in national policy (Chapter 9). ○ An additional question required in the decision-making appraisal questions regarding the re-use and recycling of secondary aggregates. National policy encourages the recycling and reuse of materials from the redevelopment of brownfield sites as a substitute for primary aggregates. There should be a question 'Will it use land that has been previously developed?' The supplementary question should be 'Will it encourage the re-use and recycling of secondary aggregates?' Yes would be positive, No would be negative (Chapter 9). 	<p>mineral safeguarding is the process by which it is ensured that non-minerals development does not, without reason, prevent future extraction of locally and nationally important minerals. The following Sustainability Issue / Problem has been added to Task 3 'The need to ensure that non-minerals development does not needlessly prevent the future extraction of locally and nationally important minerals'.</p> <ul style="list-style-type: none"> • Support welcomed. • Noted. Decision-Making Criteria 2a on the minimising of waste production and recycling has been added. No Site Specific Decision-Making Question has been included, however, as it is considered that it is development specific. • Partially agree. Decision-Making Criteria 2b and Site Specific Decision-Making Question 2a on mineral resources has been added and additional text has been added to the associated Task A2 that consideration should be given to the issue during detailed site assessment. It is not, however, considered that any question should directly reference CS16. • Noted. No action recommended. The SA Framework includes a decision-making question on PDL land, buildings or existing infrastructure. It is suggested that the re-use and recycling of secondary aggregates, however, is development specific.
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<ul style="list-style-type: none"> • Minerals and Waste (Q4a): <ul style="list-style-type: none"> ○ Suggested sustainability indicators in relation to minerals and waste planning are: <ul style="list-style-type: none"> ○ Number of sites on Mineral Safeguarding Areas where M&W Core Strategy Policy CS16 has been compiled with as part of the application process. ○ Number of sites where the reuse and recycling of material into secondary aggregate for use during the construction phase has taken place, in accordance with M & W Core Strategy Policy CS17. ○ Number of sites within the consultation areas for existing mineral extraction, existing waste management facilities, mineral site specific allocations and key Wastewater treatment works where M & W Core Strategy Policy CS16 has been compiled with as part of the application process. • Flooding <ul style="list-style-type: none"> ○ Aware that the current SFRA is out of date and is likely to be updated. The current SFRA does not include information now available on surface water flooding (e.g. Environment Agency Maps) and how this would be used when looking at local flood risk. Highlight that the EA surface water flood map should be used alongside the rivers and sea flood zones and application in the sequential approach to planning. An area of Flood Zone 1 for rivers and sea may still be at high risk of surface water flooding. The surface water flood map can be used to show that 1 in 100 year is equivalent to Flood Zone 3 and 1 in 1000 year is equivalent to Flood Zone 2 (as indicated in Planning Practice Guidance Paragraph: 018 Reference ID: 7-018-20140306). This should be considered when looking at Sustainability Objective No 2. The updated SFRA would be used to inform a SA, strategic environmental assessment and eventually the Local Plan. It would need to undertake the sequential and exception tests at an early stage in the Plan making process to ensure that any preferred site allocations are appropriate according to the risks of flooding (including local sources of flood risk). This would ensure that sustainable development is undertaken in the timeframe of the plan with regards to flooding. We note and welcome that the Scoping report includes information from our Local Flood Risk Management Strategy and would like to see this taken forward into the sustainability appraisal. ○ Climate change is one of the key issues relating to sustainability and flooding is one key environmental issue that is affected by it. The current 	<ul style="list-style-type: none"> • Noted. The comments appear to relate to suggestions on how to monitor and review the effectiveness of the Local Plan rather than just sustainability indicators. Indicators have been added to the SA Framework. These will be included in the next iteration of the SA Scoping Report. Proposals for monitoring will be developed as work on the Local Plan processes, reflect the policy content and relevant quantifiable base line indicators. • Noted. Clarification and advice welcomed. A 2017 SFRA (Level 1) has been produced and will help inform the emerging Local Plan.
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<p>information on risks of flooding e.g. EA surface water flood mapping does not take into account an allowance for climate change and so any assessment should consider this as per section 8.0.1 of the scoping report. Also highlight these climate change allowances should be considered when surface water drainage from development is considered.</p> <ul style="list-style-type: none"> o Expects any new development to avoid local flood risk issues (as the most sustainable form of flood risk management) and to include SuDS. o Local historical flood information and number of properties at risk of surface water flooding can be provided. o Would welcome opportunity to comment on site allocations or policy relating to local flood risks (surface water, groundwater) and surface water drainage (SuDS). 	<ul style="list-style-type: none"> • Agree. A 2017 SFRA (Level 1) has been produced and will inform the emerging Local Plan. • Noted. It is considered that the framework criteria and associated questions would enable flooding to be considered. • Noted. • Noted. Further consultation with statutory providers will take place as policy options and policies are considered through statutory consultations and through ongoing dialogue through the duty to co-operate.
<p>RSPB (ref: DSR09)</p>	
<ul style="list-style-type: none"> • Comments made at the informal stage have been addressed. No further comments to add at this stage. 	<ul style="list-style-type: none"> • Noted. Acknowledgement welcomed. No action recommended.
<p>Member of the Public (ref: DSR10)</p>	
<ul style="list-style-type: none"> • Concern raised in respect of burning wood in the home and resultant respiratory problems and ill health. Should be included in the SEA / SA plan. • Suggests legislation is required to enforce laws that ban this wood burning in built up towns to protect health. 	<ul style="list-style-type: none"> • Noted. No action recommended. The SA Scoping Report discusses odour pollution within the Climate Change, Energy, Air Quality and Pollution chapter. Whilst the burning of wood in the home is not specifically identified (instead, the paragraph gives the total number of odour complaints received and notes what the most common complaint related to), it does state that problems associated with odour tend to arise in residential areas. The need to consider pollution is also included within the Chapter's Task 3. • Disagree. The purpose of the SA Scoping Report is not to make legislation.
<p>Norfolk Coast Partnership (ref DSR11)</p>	

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<ul style="list-style-type: none"> • Q3a & Q3b: <ul style="list-style-type: none"> ○ Welcomes the approach to SA and appraisal questions, the Sustainability Appraisal Framework, objectives and appraisal questions are appropriate and helpful in most cases. ○ Objectives and questions should include water quantity (minimising impacts on ground water and rivers, reducing use etc) as well as water quality (Chapter 9, Land, Water and Soil Resources Sustainability Theme). ○ Welcome the strong recognition of geodiversity but considers the Decision-Making questions for biodiversity should more clearly include recognition of undesignated / unprotected sites and species as well as designated sites and protected species, especially those that are characteristic of the area (may also be a requirement under the NERC Act) (Chapter 9, Biodiversity, Fauna, Flora and Geodiversity Sustainability Theme). ○ Suggest it is important to include an objective on enhancing and conserving the special qualities of nationally designated landscapes in addition to the objective on landscape character and to include questions on whether it conserves and enhances natural beauty and setting in protected landscapes for policies and allocations. This would also help to fulfil a duty under section 85 of the CroW Act (Chapter 9, Landscape, Townscape and Historic Environment Sustainability Theme). • Q4a: <ul style="list-style-type: none"> ○ Appears to be little reference to indicators in the draft document, although these would be useful in helping to understand whether objectives were being met. Is it intended to include these within the Sustainability Appraisal Framework? • Designation maps: <ul style="list-style-type: none"> ○ There is no map for landscape designations or nature conservation designations (Chapters 6.4 & 6.3). 	<ul style="list-style-type: none"> • Noted. Support welcomed. No action required. • Agree. Objective SA3 and Decision-Making Criteria for Policies 3b and Site Specific Decision-Making Question 3a now refers to water quantity. • Agree. Decision-Making Criteria for Policies 6a and Site Specific Decision-Making Question 6a have been updated to include non-designated sites. • Clarity. SA Objective SA8 has been amended to specifically include designated landscapes (although to include not just nationally designated landscapes) and Decision-Making Criteria for Policies 8a and Site Specific Decision-Making Question 8a amended to incorporate conserving and enhancing the area's landscapes, townscapes and seascapes (although not just to cover protected landscapes). • Noted. Indicators have been added to the SA Framework. These will be included in the next iteration of the SA Scoping Report. • Agree. Further maps have been included showing the landscape designations of the District eg SSSI.
<ul style="list-style-type: none"> • Council should ensure that the SA process clearly justifies policy choices. Decision-making and scoring should be robust, justified and transparent and 	<ul style="list-style-type: none"> • Noted. The SA is an iterative process and is divided into 5 main stages. These are set out in the national Planning Policy Guidance.

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<p>should be undertaken through a comparative and equal assessment of each reasonable alternative.</p> <ul style="list-style-type: none"> • Council should not lose sight of objectives to support the delivery needs of the District's economic development and the need to provide housing to meet its objectively assessed needs. • Disappointing that the SA Scoping Report does not seek to increase the delivery of market housing that will allow access onto the open housing market. Increasing the supply of market housing sites will increase the potential delivery of affordable housing provision. Housing delivery will have a profound positive impact on sustainability criteria; too often the SA process flags the negative aspects of development whilst not fully considering the positive aspects which can be brought about through new opportunities for housing development and how these can positively influence wider indicators such as water quality, air quality, landscape issues, health and the economy. • It is important for the Council to consider all options for the distribution of housing and employment growth to ensure that objectives set out in the Framework are met so that the needs of all sectors of the District's communities are met in full. This includes distributing growth to all sustainable settlements across the District, including a meaningful level of growth to rural settlements. 	<p>The Local Plan will consider policy options and reasonable alternatives informed by the SA when selecting their preferred policy choice</p> <ul style="list-style-type: none"> • Noted. The Housing chapter covers all housing types and Task A3 identifies that the housing market does not meet the needs of all parts of the community. The SA covers all aspects of sustainability; environmental, social and economic. SA Housing Objective SA12 has been amended to incorporate 'suitable' into the description. • Clarify. Decision-Making Criteria for Policies 12a and 12b and Site-Specific Decision-Making Questions 12a and 12b have been amended. The SA covers all aspects of sustainability; environmental, social and economic. • Noted. No action recommended. The Local Plan process will review the District's overall spatial strategy, based on an updated spatial portrait and identification of key issues and challenges and reasonable alternatives.
<p>Ropes Hill Dyke Residents Association (ref DSR13)</p>	
<ul style="list-style-type: none"> • Promoting good governance: There are existing problems with governance and democratic accountability given that NNDC interleaves with The Broads and Broadland. Reference to 'Promoting Good Governance' being one of the guiding principles of sustainable development (para. 2.0.5 & Figure 1). • Saline Inclusion of tidal surges destroying the unique fresh water habitat of the region's waters and Broads: <ul style="list-style-type: none"> ○ Refers to requirement 'f' of the SEA Directive's Requirements (Table 1). Suggests that a particular danger in the region is the saline incursion of tidal surges destroying the unique fresh water habitat of the regions waters and broads. Notes that the area is an area of serious water stress. 	<ul style="list-style-type: none"> • No action required. The Council engages constructively with neighbouring authorities through the Duty to Cooperate. • Partially Agree. <ul style="list-style-type: none"> ○ Table 1 is a reference table published by DCLG. ○ Flooding can occur as a result of high river flows and high sea levels and the risk of flooding will increase with sea level rises, more intense rainfall and other changes predicted as a consequence of climate change. The impact of flooding can

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<ul style="list-style-type: none"> ○ Suggests that the paragraph could mention salination of water bodies (para. 6.2.2.1). ○ Suggests that the paragraph could mention salt water incursion (para. 6.2.2.6). ○ Suggests that Tidal Barriers could be an important means of addressing this sustainability issue (Map 4, paras. 6.2.2.9 & 6.2.3). ● Addressing the economic and social strengths and opportunities in the region: <ul style="list-style-type: none"> ○ Suggests that not including boatbuilding, marine and related infrastructure of North Norfolk and the Broads is a significant omission. Suggests that tourism could include boating; both inland and coastal (para. 5.06). ○ Suggests that Healthy life opportunities water borne recreation could mention this pursuit (para. 6.5.1). ○ Suggests that sailing, canoeing and boating should be emphasised (para. 6.5.2.12 & 6.5.2.13). ○ Employment in boating and marine based industries is missing (para. 6.7.1 & 6.7.2.8). 	<p>be widespread and effect biodiversity as well as communities. North Norfolk contains a small part of the Norfolk Broads however the Broads Authority is the Local Planning Authority for the Broads. Additional text has been added around the risks from climate changes and potential for impacts on fresh water habitats and flood defenses in the relevant 'Climate Change, Energy, Air Quality & Pollution' chapter. The Local Plan will be informed by any updated Strategic Flood Risk Assessment which will include an assessment from all sources of flooding and incorporate national climate change.</p> <ul style="list-style-type: none"> ● Noted. No action recommended. The purpose of the SA Scoping Report is not to develop policies, but to identify the key sustainability criteria and issues. ● Clarify. Paragraph 5.0.6 is an overview portrait of North Norfolk and discusses tourism generally and does make reference to The Broads, although the SA Scoping Report does not break down different aspects of tourism (such as boating). The Economic Activity and Education chapter also recognises the vital contribution tourism makes to the economy, noting that both the natural and historic environment represents a strong draw for tourists. Whilst boating is not specifically mentioned, reference is again made in the Landscape, Townscape and Historic Environment chapter to the economic prosperity of North Norfolk being irrevocably linked to the success of its tourism sector with a number of unique environmental and historic assets making it particularly valuable to the tourism industry including its coastline and beaches, areas of countryside and the Broads. The Economic Activity and Education chapter includes a graph illustrating employment by occupation and a further graph showing employee jobs by industry; these will incorporate boatbuilding. The link between planning and health is well-established, with planning playing a key role in promoting healthy behaviours and supporting reductions in health inequalities. Of particular importance for the Local Plan, is the expected continuing trend for an increasingly ageing population. Having an evidence-based Local Plan in place will provide an
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<ul style="list-style-type: none"> Renewable energy and climate change: suggests inclusion of heat pumps ingesting water courses (para. 6.2.2.13) also on consultation NNDC and Annual Action plan sustainable energy and North Norfolk must have tidal energy opportunities (para. 6.4.1). Open landscape and big skies of the region could be compromised if unwelcome encroachment of vegetation took place in reed beds and open areas. Desiccation and abandonment of reed cutting are key factors (para. 6.4.2.4). 	<p>opportunity to address the population's health needs (including any specific health needs of the ageing population) and address any changing needs in how open space, sports or activities are used. It will also enable consideration to be given to links (including green infrastructure links) to the countryside and open spaces to promote healthy lifestyles and well-being.</p> <ul style="list-style-type: none"> Noted. No action recommended. The Local Plan will consider policy options and reasonable alternatives informed by the SA when selecting the preferred policy choice. Noted. No action recommended.
<p>CPRE Norfolk (ref: DSR14)</p> <p><u>General</u></p> <ul style="list-style-type: none"> Report is comprehensive and well written, recognising that there are considerable cross cutting within the three threads of sustainable development. Two attachments included: <ol style="list-style-type: none"> CPRE commentary on the Anglian Water document, Water Resource Management Plan (WRMP) 2015-2040, and; An article on the relationships between water resource, nature conservation and agriculture, which all interlock. Challenge the opening sentence on page 6 which assumes at the outset that the planned growth rates are sustainable; in the case of water, would argue that they are not when considered in the time span of the Plan and beyond. The first half of the quoted sentence should be standalone; the second half should say 'in order to assess whether the planned growth rates are achievable in a sustainable way'. Consider that the issue of water resource to be crucial in the progression of the Local Plan (pp. 6, para. 1.5). Information and commentary provided on CPRE's Water's Resource Management Plan (WRMP), covering water resource for the public water supply 	<ul style="list-style-type: none"> Support welcomed. Noted. No action recommended. These articles provide additional background information to the issues CPRE have mentioned. They are considered informative and useful background reading - no further action required. Noted. The relevant sentence has been amended to the following: <i>'Local Planning Authorities should positively seek opportunities to meet the development needs of their area. The SA will need to consider how to promote the sustainable use of natural resources (such as land and water) and other social and environmental aspects of sustainability in order to assess whether the policy options and alternatives on growth rates are achievable in a sustainable way.'</i> Noted. No action recommended. This provides CPRE commentary on Anglian Water's Resource Management Plan and comments on

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<p>across Norfolk (emphasis on the North Norfolk Coast Resource Zone (RZ) and the Norwich and Broads RZ). Discusses abstraction levels in respect of nature conservation and the environment as a whole. Climate change is a cross-cutting issue and a hotter climate has implications for water resource, not only the greater demand, but if reservoirs are brought into use in Norfolk the evaporation losses will be much greater than the aquifer and river sources at present; and water pumping is energy intensive. Pollution is another cross cutter. Soil management in arable farming is at the forefront of water management. Supports the reduction in abstraction boreholes that affects the Chalk aquifer in North Norfolk</p> <ul style="list-style-type: none"> • Need to consider water for domestic use, as well the interests of nature conservation and the support needed to be given to agriculture to reduce pollution. Diffuse pollution from agriculture can present acute problems for public water supply drawn from the aquifers, faced with a clean-up of agrichemicals, or having to discard some boreholes. Arable run-off is also a problem as regards a potential rush of agri-chemicals in the surface abstraction from rivers by the water company. Both diffuse pollution and the water borne soil erosion adversely impact on wildlife, in particular water dependent habitats. Siltation of rivers, the Broads and lakes is their single greatest single problem. Currently debate tends to be pitched as nature conservation versus farming; in fact, the interests of nature conservation and domestic supply converge on the water quality issue. • There are some major changes welcomed by NNDC as good for economic activity but have the potential to cause serious problems and need to be managed for collateral damage. <ul style="list-style-type: none"> ○ In particular, the impact of major road schemes around Norwich, and the planned levels of growth for housing and associated development. Increased people to the District raises issues on people pressure on the AONB coast landscapes and wildlife disturbance; competition for existing and new build houses; and particularly for second homes in the coastal villages and for some miles inland. 	<p>climate change. The Document itself is referenced in the Draft SA Scoping Report. It is considered no further action is required at this stage, as mentioned above; the impact of new development on water resources has been identified as a consideration in the SA Framework.</p> <ul style="list-style-type: none"> • Noted. No action recommended. The SA Framework will allow the assessment of different policy options, including those around water quality and impact on wildlife. • Noted. It is recognised that the District is affected by external as well as internal influences. Various work has/will be carried out under the Duty to Cooperate to identify strategic cross-boundary planning issues. In terms of housing, a Strategic Housing Market Assessment (SHMA) has already been completed. In terms of visitor pressure, a study of the visitor impact on internationally-designated sites has been completed. The following additional issue / problem has been added to the Biodiversity, Fauna, Flora and Geodiversity Chapter 'How to address visitor pressure on designated sites'.
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<ul style="list-style-type: none"> ○ Off-shore windfarms and impact on landscape and wildlife. Focus should be on renewable energy projects for small-scale and local use. There should be no larger on-shore wind turbines which are the most invasive in landscape terms and contribute little in terms of total wind energy delivery. ○ Increasing use of internet shopping in rural areas with the proliferation of delivery vehicles not suited to the road network. There will also be an impact on the viability and vitality of market towns. 	<ul style="list-style-type: none"> ● Noted. No action recommended. The SA Framework will allow the assessment of different policy options, including those around off-shore windfarms and the impact on landscape and wildlife. ● Noted. No action recommended. The need to retain retail spend in market towns and the need to retain rural services in towns and villages has been identified as a key sustainability issue within the SA Scoping Report (Economic Activity and Education Chapter). The Infrastructure and Accessibility chapter makes reference to there being poor transport connectivity throughout the District. The Council commissioned further evidence on retail matters to inform policy approach and provide additional base line retail information as part of the Local Plan.
<ul style="list-style-type: none"> ● Q2b: Land, Water and Soil Resources: <ul style="list-style-type: none"> ○ There is a focus on minimising the loss of agricultural land in meeting requirements of growth and development. Argue that the SA is the forum for bringing together the inter-relations between water, soil and agriculture, and; ○ Agree that it is not only the implications of the supply-demand balance in delivering public water that need to be considered, but also issues further down the line in the water cycle; sewage networks, waste water treatment works and the quality of the discharge of the latter into water courses. Anglian Water have the statutory requirement to serve all existing and new development with potable water; at the other end of the process is OFWAT, which regulates the investment programme of water companies, and protects consumers from politically sensitive price increases. The result is a squeeze on the existing infrastructure, and perhaps more so areas of high growth rates. (pp. 82-84). ● Q2b: Climate Change, Air Quality, Pollution and Energy: <ul style="list-style-type: none"> ○ Within the WRMP time horizon, much of Norfolk will need to find new sources of water resource, and the preferred option is Water Reuse; 	<ul style="list-style-type: none"> ● Noted. No action recommended. The SA Framework will allow the assessment of different policy options, across all strands of sustainable development including those around water, soil and agriculture. ● Noted. No action recommended. Anglian Water is a statutory consultee and there is ongoing consultation and collaboration directly and through the Norfolk Wide Duty to Cooperate platform.

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<ul style="list-style-type: none"> • Noted. No action recommended. The SA will provide a platform to assess any policy and suitable alternatives against in order to inform policy development. • Noted. No action recommended. Climate change mitigation and adaptation is seen as a cross-cutting issue within the SA Scoping Report. The purpose of the SA Scoping Report is not to consider the viability of individual schemes. • Noted. No action recommended. The purpose of the SA Scoping Report is not to develop policies. The SA will provide a platform to assess any policy and suitable alternatives against in order to inform policy development • Noted. No action recommended. This is for the Local Plan to consider. • Noted. 	<ul style="list-style-type: none"> ○ Trend is towards more pumping of water and from longer distances to meet needs. This must work against climate change objectives. Water companies should receive more support for water conservation measures, including the installation in new development that should not melt away 'subject to viability' when it comes to the actual build; ○ Argue that all renewable energy should be small scale and for local use. For large turbines there can be no landscape mitigation, and the impact and wildlife casualties have been greatly under-estimated by current assessments; ○ Supportive of existing coastal erosion and roll-back approach to maintain community coherence, and; ○ Welcome Council interest in minimising light pollution and the intrinsic value of being a Dark Skies area. (pp. 82-84).
<ul style="list-style-type: none"> • Noted. No action required. • Noted. No action recommended. This is for the Local Plan to consider. Under the Duty to Cooperate the District has jointly completed a Norfolk Green Infrastructure Mapping Project (including ecological corridors). A GI Strategy is to be completed. The SA Framework will allow the assessment of different policy options, including those around GI. • Noted. No action recommended. This is for the Local Plan to consider. 	<ul style="list-style-type: none"> • Q2b: Biodiversity, Fauna, Flora and Geodiversity <ul style="list-style-type: none"> ○ Welcome sustainability reductions in the abstraction from the chalk aquifer and the restoration of subterranean flow through the North Norfolk Chalk and the benefits that will bring, and; ○ The most important GI is the river valleys, which serves a wildlife corridor and the key component in ecological networks. This is recognised in the Core Strategy Policy EN 9 and Appendix B. This should be carried over into the Local Plan. (pp. 82-84). • Q2b: Landscape, Townscape and the Historic Environment <ul style="list-style-type: none"> ○ HO8 will need to be improved to avoid detriment to the landscape from location changes of replacement dwellings; ○ The greatest impact on the AONB and seascape is off-shore windfarms with the greatest change being the loss of the feeling of wilderness, peacefulness and tranquility. Important that development in coastal areas does not add to this loss;

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<ul style="list-style-type: none"> ○ The Council should aim to retain the hierarchy of principal and secondary town settlements, and service villages and use these to make an appropriate distribution of the level of growth that will be required. This will give the greatest chance to retain the character and vitality of our market towns and built heritage. (pp. 82-84). ● Q2b: Healthy and Inclusive Communities <ul style="list-style-type: none"> ○ Imbalance in numbers of young and old would be improved by more affordable housing for local people and better provision of public transport to Norwich for education and skills opportunities; ○ May be Council initiates to attract / retain more who work from home, and; ○ Older people do require more health and care services, but job-seekers might get more satisfaction and remuneration in this area rather than those working in the tourism and service sectors, which are too dominant for good balance. ○ County Council cutback on footpaths does not help physical and mental health of residents and not all visitors will want to restrict walking to national trails. (pp. 82-84). ● Q2b: Housing <ul style="list-style-type: none"> ○ The housing problems in the district are well known and documented, with affordable housing provision being the most longstanding and pressing issue. It is difficult to see how to improve this unless national Government makes grant money directly available. Over-reliance on greenfield allocations and policies for a percentage of total build for affordable housing has a history of continuing under delivery of the affordable element. Successive rounds of land allocations for housing with the same national policies will result in a recycling of need into another repeat of the same failure. The overall impact is to provide more market housing; which local people cannot afford. 	<ul style="list-style-type: none"> ● Noted. No action recommended. The SA Framework will allow the assessment of different policy options, including those around landscape impact. ● Noted. No action recommended. The purpose of the SA Scoping Report is not to consider where individual developments would be sited. This is for the Local Plan to consider, The SA Framework will allow the assessment of different policy options including those around the spatial distribution of development and the sustainability of settlements. ● Noted. No action required. The housing market not meeting the needs of all parts of the community (in particular affordable housing) and pressures on public transport are identified as key issues within the SA Scoping Report. It is considered that these issues are suitably addressed within the relevant SA Framework questions. ● Noted. No action recommended. ● Noted. No action recommended. ● Noted. No action recommended. The SA Framework will allow the assessment of different policy and site options, including those around open space, green infrastructure etc. ● Noted. No action recommended. The SA Framework will allow the assessment of different policy and site options, including those around affordable housing.
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<ul style="list-style-type: none"> ○ Second homes issue. Argue that the answer is not to seek to add to housing allocations to satisfy demand, but to condition that new builds stays as residential use and do not become a second home; and if for holiday home on a commercial basis then it is conditioned to remain as that, or change to residential use. ○ Would encourage the continuation of windfall forming some of the housing target allocations with projections based on past experience. This avoids an over-allocation of greenfield sites, and; ○ Would challenge the issue of North Norfolk taking on a housing target which includes an add-on in dwelling numbers above ONS projections due to part of North Norfolk, and of Breckland, being in the Central Norfolk SHMA and required to support the economic growth around Norwich. Housing needed to service jobs in the Norwich area could be challenged on environmental grounds, including water resource. (pp. 82-84). ● Q2b: Economic Activity and Education <ul style="list-style-type: none"> ○ The District is overly reliant on a narrow economic base of the tourism and service sectors, and low income for employees. The services include from those associated with day visitors and those on holiday; but also to an individual offering their services for care help to residents, domestic tasks or gardening. Much of the latter will be related to elderly residents, and some second homers. Hope that the jobs predicted by the City Deal are delivered to provide support to what the District might be able to gain within the District by individuals working in small high-tech companies, or self-employed. ○ It is important that market towns survive in good health and much of this revolves around retailing. Influences from internet shopping, the increasing trend to an all-electronic money system, a cashless system. These influences need to be closely monitored. (pp. 82-84). ● Q2b: Transport and Accessibility 	<ul style="list-style-type: none"> ● Noted. No action recommended. The SA Framework will allow the assessment of different policy options, including those around principle residential uses. ● Noted. No action recommended. It is recognised that some of the housing target can be met by windfall development. ● Noted. No action recommended. The purpose of the SA Scoping Report is not to set a housing target. The housing target will be informed through the Duty to Cooperate and whether each authority can identify sufficient capacity to meet their own needs. ● Noted. No action recommended. The SA Framework will allow the assessment of different policy options, including those around employment. ● Noted. No action recommended. The SA Framework will allow the assessment of different policy options, including those around retail. The Council commissioned further evidence on retail matters to inform policy approach and provide additional base line retail information as part of the Local Plan. ● The effectiveness of the Local Plan will be monitored through Monitoring Indicators, which will be developed as work on the Local Plan processes.
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<ul style="list-style-type: none"> o Impact on radial roads from the NDR. o Given the traffic impacts from the NDR, it is important that the Bittern Line service is retained and improved, that the Airport Park and Ride is retained and that the Coast Hopper service is expanded to reduce the proportion of road travel. (pp. 82-84). 	<ul style="list-style-type: none"> • Noted. No action recommended. Various work has/will be carried out under the Duty to Cooperate to identify strategic cross-boundary planning issues. • As above. These are commercial operations outside the limit of the Local Plan.
<p>Historic England (ref: DSR15)</p>	
<ul style="list-style-type: none"> • Pleased that many of previous comments on the emerging draft have been incorporated. • Directs to Historic England advice (Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment) and updated advice which is currently out for public consultation (Sustainability Appraisal and Strategic Environmental Assessment Historic England Advice Note 8). • Q1a <ul style="list-style-type: none"> o Recommends review of: o National Planning Practice Guidance be included in scope, and; o Local- local plans for adjoining authorities o Suggestion that 6.4.1 be amended to more fully reflect Annex A (para. 6.4.1). • Q1b <ul style="list-style-type: none"> o Yes. Consider adequate consideration has been given to those plans listed. Directed to advice in links above. • Q2a 	<ul style="list-style-type: none"> • Noted. Support welcomed. • Noted. • Noted. No action recommended. Task A1 recognises that the NPPF is supported by accompanying guidance contained within the Planning Practice Guidance, as does Appendix A. A link to the Planning Practice Guidance is contained within Appendix A. • Noted. It is recognised that the District is affected by external as well as internal influences and various work has/will be carried out under the Duty to Cooperate. Neighboring authorities are consultees for consultation purposes. Reference to neighbouring authorities' plans will be added to Appendix A for consideration as relevant, although they will not be specifically listed. • Agree. 6.4.1 Should be updated to reflect Appendix A. • Noted. Support welcomed.

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<ul style="list-style-type: none"> ○ Welcomes the inclusion of a separate section on townscape and the historic environment and of the term ‘historic environment’, as it encompasses all aspects of heritage (pp. 45-51). ● Welcomes the information provided on the general historic background of the District and brief overview of the historic background of North Norfolk and its changing landscape characterisation (pp. 45-51). ● Supports the mention of listed buildings, scheduled monuments, Historic Parks and Gardens, Conservation Areas as well as Locally Listed Buildings and we welcome the mapping of these assets. Reference throughout the document should be changed from Scheduled Ancient Monuments to scheduled monuments (pp. 45-51). ● Welcomes the improved references to locally listed buildings, non-designated assets and the Historic Environment Record following earlier comments in this regard (pp. 45-51). ● More information regarding baseline information is contained in the Historic England guidance notes (pp. 45-51). ● Q2b <ul style="list-style-type: none"> ○ Broadly welcomes the issues and problems that have been identified. Suggest that bullet point 2 should refer ‘to heritage assets and their settings (designated and non-designated)’ rather than historic environment, given it specifically refers to assets. ○ Welcomes reference to ‘Heritage at Risk’ in bullet point 3 but suggest the word ‘positively’ is inserted before the word ‘address’. ○ In the final bullet point delete the word enhance. ○ Surprised to see that a section on opportunities is not included. Example opportunities for the historic environment to include within the Sustainability Appraisal can be found in guidance notes in links provided. (para. 6.4.3, pp. 51) ● Q3a & Q3b The objectives and questions set out in Section 9 of the report provide a useful 	<ul style="list-style-type: none"> ● Noted. Support welcomed. ● Noted. Support welcomed. ● Noted. Support welcomed. ● Agree. References amended to ‘Scheduled Monuments’. ● Noted. Support welcomed. ● Noted. ● Noted. No action recommended. ● Agree. Amended. ● Agree. Amended. ● Agree. The word ‘enhance’ has been removed. ● Noted. No action recommended. The SA Scoping Report is aiming to fulfil Stage A of the SA process (setting the context and objectives, establishing the baseline and deciding on the scope).
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<p>starting point. Whilst recognising that the number of objectives needs to be manageable, we recommend the objectives below:</p> <p>Environmental Objectives</p> <ul style="list-style-type: none"> o Protect, enhance and manage the character and appearance of landscapes/seascapes/townscapes, maintaining and strengthening local distinctiveness and sense of place o Protect, manage and improve local environmental quality o Achieve high quality sustainable design for buildings, spaces and the public realm <p>Social Objectives</p> <ul style="list-style-type: none"> o Improve and broaden access to the local historic environment o Provide better opportunities for people to understand local heritage and participate in cultural and leisure activities <p>Economic Objectives</p> <ul style="list-style-type: none"> o Foster heritage-led regeneration and address heritage at risk o Optimise the use of previously developed land, buildings and existing infrastructure o Promote heritage-led sustainable tourism o Support the sustainable use of historic farmsteads <p>(Chapter 9). With regard to decision making criteria, recommend the following examples of</p>	<ul style="list-style-type: none"> • Noted. Support welcomed. • Agree. The relevant Objective has been amended to incorporate these. • Noted. It is considered that existing Objectives would cover this point. • Noted. SA Objective SA8 considers landscapes, townscapes, and seascapes and their settings, local distinctiveness and a sense of place. • Agree. SA Objective SA10 has been amended to include access to opportunities. • As above. • Agree. SA Objective SA9 has been amended to include addressing heritage at risk. • Agree. SA Objective SA1 amended to specifically include reference to PDL, buildings and existing infrastructure. • Noted. It is considered that SA Objective SA14 on encouraging investment would encompass this. • Agree. SA Objective SA1 amended to specifically include reference to PDL, buildings and existing infrastructure.
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<p>appropriate criteria:</p> <p>Environmental: will the policy or proposal</p> <ul style="list-style-type: none"> o Conserve and/or enhance heritage assets, their setting and the wider historic environment? o Contribute to the better management of heritage assets and tackle heritage at risk? o Improve the quality and condition of the historic environment? o Respect, maintain and strengthen local character and distinctiveness? o Promote high quality design? o Integrate climate change mitigation and adaptation measures into the historic environment sensitively? o Alter the hydrological conditions of water-dependent heritage assets, including organic remains? <p>Social: will the policy or proposal</p> <ul style="list-style-type: none"> o Increase the social benefit (e.g. education, participation, citizenship, health and well-being) derived from the historic environment? o Improve the satisfaction of people with their neighbourhoods as places to live? o Engage communities in identifying culturally important features and areas? o Provide for increased access to and enjoyment of the historic environment? o Provide for increased understanding and interpretation of the historic environment? o Provide new leisure, recreational, or cultural activities? o Support and widen community uses through shared facilities? <p>Economic: will the policy or proposal</p> <ul style="list-style-type: none"> o Increase the economic benefit derived from the historic environment? o Promote heritage-led regeneration? o Lead to the repair and adaptive re-use of a heritage asset and encourage high quality design? 	<ul style="list-style-type: none"> • Noted. Suggested heritage and design criteria welcomed. They were considered when finalising the SA objectives and decision-making criteria. The Objectives of the Sustainability Appraisal must reflect the base line information and the identified sustainability issues and problems. • Noted. Relevant environmental decision-making criteria have been reviewed. It is considered that the amended decision-making questions would cover the points raised. In particular, Decision-Making Criteria for Policies 8a and 9a and Site-Specific Decision-Making Questions 8a and 9a. • Noted. Relevant social and economic decision-making criteria have been reviewed. It is considered that the amended Decision-Making Criteria for Policies would cover the relevant points raised. In particular, 10a, 10b and 10e and the Site Specific Decision-Making Questions 10a and 10d. It is not considered that all of the points are aspects that the Local Plan should look to address as a key issue / problem; the Council supports the production of Neighbourhood Plans where communities can identify culturally important features and areas. • Noted. Relevant, environmental and economic Decision-Making Criteria for Policies have been reviewed. It is considered that the amended decision-making questions would cover the relevant points raised. In particular, Decision-Making Criteria for Policies 14a and 1b and Site Specific Decision-Making Questions 14a and 1b. It is not
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<ul style="list-style-type: none"> ○ Make the best use of existing buildings and physical infrastructure? ○ Promote heritage based sustainable tourism? ○ Ensure that repair and maintenance is sympathetic to local character? ○ Help to reduce the number of vacant buildings through adaptive re-use? <p>(Chapter 9).</p> <ul style="list-style-type: none"> ● Q4a <ul style="list-style-type: none"> ○ Historic England’s advice note Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment (2013) provides advice on indications and data sources on page 11 and in Appendix 4. Further advice given in Paragraphs 2.13 - 2.17 of draft advice note. ● Would encourage working with local conservation officers, archaeology officers and local heritage community groups in the preparation of the SA. 	<p>considered that all of the points are aspects that the Local Plan should look to address as a key issue / problem.</p> <ul style="list-style-type: none"> ● Noted. ● Noted. No action Recommended. Consultation/notification with such groups was carried out as part of the consultation process.
<p>Lawson Planning Partnership Ltd (ref: DSR16)</p>	
<ul style="list-style-type: none"> ● Important that the SA process gives due regard to those important SA issues affecting the District in order to ensure that the most sustainable and appropriate sites in both urban and rural locations are selected for allocation within the emerging Local Plan to and ensure policies are optimised in sustainability terms. ● Considers a key issue to be the need for rural opportunities and access to sustainable modes of transport along with facilities and services. These should be clearly identified and acknowledged as part of this process; ● General comments on Sustainability Issues: <ul style="list-style-type: none"> ○ The SA Report tends to deal with the District as a whole. Consider that the rural and urban areas have, in some respect, distinct and differing sustainability issues. The Report should make a greater distinction between urban and rural areas, notably in the review and identification of sustainability issues to ensure that they are suitability addressed within the Framework, plan-making process and objectives / decision-making questions. 	<ul style="list-style-type: none"> ● Noted. No action Recommended. The SA Framework will allow the assessment of different policy options, including those around spatial distribution of development and the sustainability of settlements. ● Noted. No action Recommended. Infrastructure and Accessibility is considered within the SA Scoping Report. The SA Framework will allow the assessment of different policy options, including those around spatial distribution of development the sustainability of settlements and sustainable infrastructure/ access. ● Noted. No action recommended. The baseline information provided in the SA Scoping Report draws out the key issues and problems that the Framework should seek to address across all stands of sustainable development. The SA Framework should take into account the District as a whole.

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<ul style="list-style-type: none"> • General comments on Objectives: <ul style="list-style-type: none"> ○ Noted that in general terms the objectives cover the main areas of sustainability, however are some missing or which aren't appropriately dealt with. ○ The issue of inequality and deprivation seems to be absent from the objectives. An additional appraisal question should be added. There should be additional references that seek to improve opportunities and quality of life for people in rural areas. The decision-making criteria would then be drafted appropriately to allow the positive contribution that proposal incorporating affordable housing and / or smaller market housing in close proximity to a good bus service and, services and facilities, especially on rural sites. There are significant advantages to the allocation of such sites in sustainability terms which could make a significant difference in terms of reducing inequalities but which would not currently be picked up by the Framework (Objective 5); ○ The issue of physical and financial accessibility to housing is identified as a significant problem in terms of the Indices of Deprivation, but is not reflected in the Framework. As a starting point, the question for Objective 6 (housing) should be separated so that affordable housing is assessed as an indicator in its own right. Development providing a greater level of affordable housing has a greater positive sustainability impact than those that don't and the Framework should show this (Objective 6); ○ Considered that Objective 5 should have an additional decision-making question relating to the provision of affordable or rural housing to allow the positive impact in relation to quality of life to be shown (Objective 5); ○ Crime has been omitted from the Framework and should be added (Objective 5); ○ Increasing sustainable modes of travel and reducing car travel and congestion has been omitted from the Framework. Objective 8 decision- 	<ul style="list-style-type: none"> • Support welcomed. The Objectives of the Sustainability Appraisal must reflect the base line information and the identified sustainability issues and problems. • Noted. The SA Framework is a tool for assessment of policies and sites, not specific proposals. Deprivation and inequality is covered in the Healthy and Inclusive Communities chapter. In particular, amended SA Objective SA10 covers quality of life, as does Decision-Making Criteria for Policies 10a, 10f and 10e and Site Specific Decision-Making Questions 10e. It is also recognised that, as with all of the issues, deprivation and inequality cross-cutting with other topics such as housing, transport and access etc. • Noted. The Housing chapter covers all housing types and Task A3 identifies that the housing market does not meet the needs of all parts of the community. Amended Objective SA12 and Decision-Making Criteria for Policies 12a and Site Specific Decision-Making Question 12a covers housing types and sizes. • Noted. Amended Objective SA12 and Decision-Making Criteria for Policies 12a and Site Specific Decision-Making Question 12a covers housing types and sizes. It is recognised that there are interrelationships across all strands of sustainable development. • Agree. Reducing crime and fear of crime has been included as SA Objective SA11 and additional Decision-Making Criteria for Policies 11a and Site Specific Decision-Making Questions • Noted. Reducing the need to travel and promoting the use of sustainable transport is included in the draft framework. Decision-
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<p>making questions do not fully address this issue. The question could be 'will it support or increase travel through non-car modes of transport?' with decision-making criteria referring to access to regular bus service and / or good walking and cycling opportunities being positively scored and sites without good opportunities for non-car modes of travel scoring negatively. (Objective 8) ;</p> <ul style="list-style-type: none"> o Objective 2 relates to air quality of which vehicle emissions are a significant factor. An additional question should be added relating to reducing congestion. The decision-making criteria would then allow for a positive scoring where sites are either within walking distance of facilities and services or where the site is in close proximity to a good and regular bus service (Objective 2). • General comments on assessment process <ul style="list-style-type: none"> o Decision-making criteria for all objectives should take into account the possibility of opportunities presented by the prospect of development. In some areas development provides opportunities for improvements such as drainage and landscaping. Site assessments should be carried out positively to reflect these opportunities; o When carrying out assessments, the Council should be careful and consistent in terms of assumptions made (e.g. not assume that because a site is adjacent to a school the school has capacity and around assuming that greenfield development would have a greater impact on wildlife and landscape than a brownfield site would. Assumptions should have sound foundations, which may require separate discussions with statutory consultees, service providers etc; o Some of the decision-making criteria do not contain explanations / adequate explanation as to how the outcome / rating will be attributed to a site / policy assessment. In some areas it would be helpful to have this so it is clear how sites and policies will be assessed and to ensure a consistent approach; o Include 'N/A' boxes when objectives and / or decision-making questions are not applicable to certain proposals / policies. When there could be 'nil' 	<p>Making Criteria for Policies 16b and Site Specific Decision-Making Question 16b will enable this issue to be considered.</p> <ul style="list-style-type: none"> • Noted. North Norfolk has met all of the national air quality objectives. It is recognised that future development has the potential to impact on air quality and it is considered that the issue is adequately covered as an 'issue and problem' and within the SA Framework. The decision making questions already include questions on sustainable modes of transport including access to other forms of transport and improved accessibility, as well as an objective and associated criteria on air pollution. Site Specific Decision-Making Question 5a also considers the topic. • Noted. The SA Framework will allow the assessment of different policy options, across all strands of sustainable development. • Noted. The SA Framework will allow the assessment of different policy options, across all strands of sustainable development. Site assessments and policy requirements will be informed by the relevant statutory consultee. • Noted. The SA Framework will allow the assessment of different policy options, across all strands of sustainable development in a consistent way and inform site assessment. It is recognised, however, that judgments will have to be made when assessing policy / site options. • Noted. In some cases it is recognised that a policy or proposal could have a neutral effect on the indicator.
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<p>effect a '0' option should be included not just a positive / negative outcome;</p> <ul style="list-style-type: none"> o Add a column to the Framework titles 'Mitigation Measures / Advisories' to allow Officers to pick up points that might help in maximising sustainability going forward eg where a development provides an opportunity to improve landscape or reduce visual impact, then it would be useful to make this point so that it can be taken into consideration at all future stages of the planning process. • Objective 1- Land, Water and Soil Resources-waste minimisation and recycling disappears after the decision-making question column and should be included in the following column (Objective 1). • Objective 2- Climate Change, Energy, Air Quality and Pollution: <ul style="list-style-type: none"> o It would be useful to have more information on how the surface water flooding test would be applied (currently just a 'yes' and 'no' option). Development could bring improvements in surface water flooding and it is important to consider these opportunities when carrying out the assessment; o A key issue at a local level in terms of air quality and climate change is traffic congestion and resultant emissions. An additional decision-making question should be added, relating to the issue of seeking to reduce car travel and congestion or to encourage non-car modes of transport. (Objective 2) • Objective 3- Biodiversity, Fauna, Flora and Geodiversity- decision-making question refers to potential to enhance; it would be useful to know on what basis this potential would be determined to ensure sites are tested consistently and fairly. (Objective 3) • Objective 4- Landscape, Townscape and Historic Environment- the information on how a landscape assessment score would be attributed is useful. The same 	<ul style="list-style-type: none"> • Disagree. The SA Framework will allow the assessment of different policy options, across all strands of sustainable development and will inform the more detailed site assessment process. • Agree. Decision-Making Criteria 2a on the minimising of waste production and recycling has been added. No Site Specific Decision-Making Question has been included, however, as it is considered that it is development specific. • Disagree. The SA is not appraising individual schemes. In relation to flooding it is informed by the sites location in relation to the established flood zones. • Noted. North Norfolk has met all of the national air quality objectives. It is recognised that future development has the potential to impact on air quality and it is considered that the issue is adequately covered as an 'issue and problem' and within the SA Framework. The decision making questions already include questions on sustainable modes of transport including access to other forms of transport and improved accessibility, as well as an objective and associated criteria on air pollution. Site Specific Decision-Making Question 5a also considers the topic. • Clarify. The amended Framework response boxes provide further explanation on how sites will be considered. It is recognised, however, that a balanced conclusion will have to be made when considering options. • Noted. Support welcomed.
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<p>level of explanation could be applied to other questions. (Objective 4)</p> <ul style="list-style-type: none"> • Objective 5- Healthy and Inclusive Communities <ul style="list-style-type: none"> ○ Decision-making questions are scant with distinct areas missing, including inequality and deprivation and crime. In terms of deprivation and inequality, access to good public transport can be a pertinent issue; there should be a question relating to access to quality of public transport and wider connections to services, facilities, community events, places and experiences. Access to public transport opens up access to all of these things and in providing these opportunities, helps to reduce inequalities; an important part of encouraging inclusive and healthy communities. ○ There is disconnect between the question and decision-making question about access to essential services. The question reads at an end 'such as health facilities', as though this is one of a number of considerations. The decision-making criteria associated with this refer to whether a site is within / outside a settlement boundary with a GP. Further, do not consider that a site located outside, but adjacent to a settlement boundary is necessarily any less sustainable in terms of access to essential services than a site within the boundary; e.g. a school or GP may also be located close to the edge of a settlement boundary, meaning that development adjacent to the boundary would be more sustainable in this respect than other sites within the boundary. The approach to assessing this aspect of sustainability should, therefore, be revised. The reference to GPs should be removed from the decision-making criteria and reference to being in or adjacent to a settlement boundary should not be a determining factor. The question should be reviewed to be more precise about which essential services it is referring to; ○ In respect of the question relating to open space, it is access to open space that is important rather than provision of, or increase in, open space. • (Objective 5) • Objective 6- Housing <ul style="list-style-type: none"> ○ Affordable housing should have a question in its own right; 	<ul style="list-style-type: none"> • Noted. It is considered that amended Decision-Making Criteria for Policies 16b, 10b, 10c, 10e, 10f and 11a and Site Specific Decision-Making Questions 16b, 10a, 10b, 10d, 10e and 11a would enable the issue to be considered. • Noted. Access to local services is considered under the Healthy and Inclusive Communities theme and the Infrastructure and Accessibility theme. In particular, it is considered that amended Decision-Making Criteria for Policies 10c, 10f and 16b and Site Specific Decision-Making Questions 10b, 10e and 16b would enable the issue to be considered. Wording of the Objectives, Criteria and Questions have been considered to avoid duplication and provide clarity of decision-making questions. • Clarify. The amended draft SA Framework does allow the assessment of different policy options with regard to access. • Disagree. The Housing chapter covers all housing types and Task A3 identifies that the housing market does not meet the needs of all parts of the community. The SA covers all aspects of sustainability; environmental, social and economic.
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<ul style="list-style-type: none"> ○ A further question about providing a range of house sizes / types should be asked. A development that offers only large housing units is likely to offer less in the way of sustainability benefits than one offering a range of units, particularly one including smaller, more affordable units as this is a sustainability problem identified within the Report in terms of deprivation and; ○ Support the fact that all housing sites result in a positive sustainability rating. It seems inappropriate that sites not proposing housing should receive a negative score; all types of development are needed and in some cases housing may be inappropriate or may be at the expense of another much-needed use (e.g. a school). Consider an option of a '0' or 'N/A' rating would be more appropriate for non-housing sites. A negative rating might apply only to a loss of housing. (Objective 6) ● Objective 7- Economic Activity and Education <ul style="list-style-type: none"> ○ It would be useful to know how town centre viability would be assessed; all residential development would contribute to this- would this be considered as part of the assessment process for this question, and; ○ Sites not proposing education provision should not score negatively; all uses are required in order to achieve sustainable development. Not appropriate for all sites to come forward for education purposes. Consider an option of a '0' or 'N/A' rating should be applied unless the site should otherwise come forward for educational use of if the development would result in the loss of land designated for educational use. (Objective 7) ● Objective 8- Infrastructure and Accessibility <ul style="list-style-type: none"> ○ Questions under this objective seem scant. The objective relates to accessibility; as a minimum, there should be a question relating to public 	<ul style="list-style-type: none"> ● Agree. Decision-Making Criteria for Policies 12a and Site Specific Decision-Making Question 12a has been amended to allow consideration of the issue. ● Noted. Allocations not contributing towards housing provision would give a neutral response, rather than a negative. ● Clarify. The amended Framework response boxes provide further explanation on how sites will be considered. It is recognised, however, that a balanced conclusion will have to be made when considering options. ● Clarify. The amended Framework response boxes provide further explanation on how sites will be considered. ● Agree. Access to public transport and the scope to increase sustainable modes of transport are identified as key issues within the SA Scoping Report. It is considered that amended Decision-Making Criteria for Policies 16a-16b and Site Specific Decision-Making
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<p>transport provision which directly relates to and addresses the issue of accessibility. There is a wider issue in terms of the need to reduce congestion, which in accessibility terms relates to freeing up the transport network and improving overall accessibility; additional questions should be added;</p> <ul style="list-style-type: none"> o It is not clear why education in particular has been singled out in this section in terms of infrastructure and accessibility over other facilities and services. The decision-making questions also refer to a list of 'core facilities' contained within the HELAA; the SA is a document in its own right and the facilities and services should be clearly listed, and; o Welcome approach of applying different measurement to towns and other areas of the District. It is important that rural areas are not overlooked or unnecessarily ruled out by assessment criteria not fit for purpose. Acknowledging that an innate distinction between urban and rural areas is important, the use of separation distances is considered to be an appropriate way to deal with this. (Objective 8). <ul style="list-style-type: none"> • Further information and supporting information put forward in respect of Client's site. 	<p>Questions 16a-16b allow consideration of the Infrastructure and Accessibility theme.</p> <ul style="list-style-type: none"> • Agree. The SA will consider accessibility to a range of services and facilities. It is considered that amended Decision-Making Criteria for Policies 16b and Site Specific Decision-Making Question 16b would allow consideration of the issue. • Noted. No action Recommended. The baseline information provided in the SA Scoping Report draws out the key issues and problems that the Framework should seek to address across all stands of sustainable development. The SA Framework should take into account the District as a whole. Infrastructure and Accessibility is considered within the SA Scoping Report. The SA Framework will allow the assessment of different policy options, including those around spatial distribution of development the sustainability of settlements and sustainable infrastructure/ access. • The SA Framework will allow the assessment of different policy options, across all strands of sustainable development and will inform the more detailed site assessment process. The SA Framework should take into account the District as a whole.
<p>Natural England (ref: DSR17)</p> <ul style="list-style-type: none"> • Satisfied that the SA is proceeding in a proper, logical and consistent manner. Support topic-based approach and are pleased to see consideration of issues of importance to Natural England (including but not limited to, statutory designated sites and landscapes, biodiversity, climate change, water resources, geology and soils). • Q1a <ul style="list-style-type: none"> o EU Biodiversity Strategy 2020 o EU Air Quality Directive 2008/50/EC o EU Council Directive on the Conservation of Habitats of Wild Fauna and Flora 92/43/EEC o EU Bathing Water Directive 2006/7/EC 	<ul style="list-style-type: none"> • Noted. • Noted. Support welcomed • Noted. The majority of the identified policies, plans and programmes and sustainability objectives listed have already been included in the SA Scoping Report. Additional ones have now been included.

Draft SA Scoping Report - Schedule of Comments (Consultation 10 October – 21 November 2016)

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<ul style="list-style-type: none"> ○ Countryside and Rights of Way Act 2000 ○ Natural Environment and Rural Communities Act 2006 ○ Wildlife and Countryside Act 1981 ○ The Conservation of Habitats and Species Regulations 2010 ○ Safeguarding our Soils- A Strategy for England (2011) ○ Shoreline Management Plan 5 ○ Shoreline Management Plan 6 ○ Norfolk Geodiversity Action Plan ○ Norfolk Coast AONB Management Plan ○ Site Improvement Plan For SACs and SPAs ○ Green Infrastructure strategy ○ Biodiversity plans ○ Norfolk’s Rights of Way Improvement Plan 2006-2017. ○ Coastal access plans ○ The Anglian River Basin Management Plan ○ National Character Area Profile ○ Local Character Area Profile. ● Q2a & Q2b <ul style="list-style-type: none"> ○ Annex attached providing advice on sources of Local Plan evidence on the natural environment, in addition to letter responding to informal consultation. Happy that the baseline data provided covers the appropriate range of subjects. Welcome the inclusion of data regarding biodiversity, flora, fauna and geodiversity; ○ Directed towards developed Impact Risk Zones (IRZs); designed to make a rapid assessment of the potential risks posed by development proposals to: Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites. They define zones around each site which reflect the particular sensitivities of the features for 	<ul style="list-style-type: none"> ● Under the Duty to Cooperate, the District is jointly commissioning a Norfolk Green Infrastructure Mapping Project. The SA Framework will allow the assessment of different policy options, including those around GI. ● Additional biodiversity plans added: Site Improvement Plans (SIPs): East of England, National Character Areas (Natural England), The Wash and North Norfolk Coast European Marine Site (WNNC EMS) Annual Management Plan 2015 – 2016 (S.J Bosley). ● The SA and LA includes a review of landscape Character Types as identified in the NNDC Landscape Character Assessment DPD, 2009. ● Noted. No action recommended. The appropriate sources will be utilised during subsequent assessments. ● Noted. Additional information welcomed.
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<p>which it is notified and indicate the types of development proposal which could potentially have adverse impacts;</p> <ul style="list-style-type: none"> ○ Welcome the commissioning of research into visitor pressure on Natura 2000 sites. Visitor pressure and recreational disturbance are likely to be increasing sustainability issues across the region in the future and we would like to see this included (Para. 6.3.3). Visitor pressure on designated sites is a county wide issue which is likely to continue as development continues. Would welcome the adoption of a Monitoring and Mitigation Strategy (similar to done by Great Yarmouth and Kings Lynn and West Norfolk Councils) and would be keen to engage with the Council on this. It is important that this issue is adequately recognised within the Sustainability Appraisal to ensure that the later plan and policies are found to be sound. It would also allow for comparable monitoring and mitigation across district boundaries; ○ In particular, would like to see the development of areas of open access Green Infrastructure within North Norfolk, possibly in the form of a multi-use district or country park. Any open access space would need to be of sufficient amenity value to attract visitors away from sites designated for conservation purposes and reduce visitor pressure. If open access space could be placed within proximity to Principle or Secondary settlements, this may go some way to mitigating pressure by providing an alternative location to designated sites. ● Q3a & Q3b <ul style="list-style-type: none"> ○ Broadly support the eight over-arching SA Objectives and welcome the appraisal questions; ○ Objective 1 - suggest an additional question regarding the availability of water such as 'Will the quantity of water required be within sustainable levels available from natural sources, rivers and aquifers?' ○ Objective 2 would suggest an amendment to the question 'Will it minimise coastal erosion and its impacts?' To 'Will it allow communities and nature to adapt to coastal change?' This incorporates NPPF (Section 10, Paragraph 	<ul style="list-style-type: none"> ● Agree. The following additional issue / problem has been added to the Biodiversity, Fauna, Flora and Geodiversity chapter 'How to address visitor pressure on designated sites'. ● Noted. The SA Framework includes Policy Criteria around the impacts on designated sites. This will enable policy options to be considered. ● Noted. Under the Duty to Cooperate, the District jointly commissioning a Norfolk Green Infrastructure Mapping Project. A GI Strategy is to be completed. These along with the visitor pressure study will inform the preparation of the Local Plan and the policy response. ● Noted. Support welcome. Suggested criteria welcomed and have been taken into account when finalising the SA Framework. The Objectives of the Sustainability Appraisal must reflect the base line information and the identified sustainability issues and problems. ● Noted. No action recommended. Anglian Water and Environment Agency are Statutory consultees in the Local Plan making process. It is not just a question of supply, but also waste water treatment. ● Noted. It is considered that the amended Decision-Making Criteria for Policies 4d and the Site-Specific Decision-Making Question 4c would enable the risk of coastal erosion to be considered.
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<p>94), and incorporates the consideration of short, medium and long term policies as outlined within Shoreline Management Policies for the area.</p> <ul style="list-style-type: none"> ○ Objective 3- welcome the provision of GI as a SA Objective. This is in line with NPPF Section 8 and Section 9 and in line with EU Biodiversity Strategy to 2020. Objective 3 could possibly rephrase the geodiversity Appraisal Question to 'Will it protect, maintain or enhance geodiversity?' There is a risk that in some situations, development on land of limited biodiversity value in its own right can lead to the creation of islands of biodiversity, permanently severed from other areas. Thus suggest adding an appraisal question such as 'Will it ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced?' This is in line with the Natural Environment White Paper 2010; ○ Objective 4- it may be beneficial to add an additional objective on the lines of 'Will it conserve and enhance the AONB designation?', and possibly include a decision making questions such as 'Will it be in line with management objectives of the AONB Management Plan?' ○ Objective 5- in addition to 'Will it encourage access to accessible open space', would recommend the inclusion of questions such as 'Will it improve the quantity and quality of open green space available?' and 'Does it adhere to the open space standards?' ○ Would also like to see a consideration of Sustainable Urban Drainage Systems included within future developments and a suitable appraisal question included within the plan. ● Q4a <ul style="list-style-type: none"> ○ Planning Practice Guidance sets out that the significant environmental effects of implementing the current local plan should be monitored. This should include indicators for monitoring the effects on biodiversity (NPPF, para. 1.17). ○ Whilst some Sustainable Indicators are alluded to within the baseline, these could be broken down further to help ensure that there are suitable 	<ul style="list-style-type: none"> ● Noted. It is considered that the amended Decision-Making Criteria for Policies 6c and the Site-Specific Decision-Making Question 6c would enable impact on geodiversity to be considered. ● Noted. No action recommended. It is considered that the objective and decision-making questions need to be broad enough to cover all designations, not just the AONB. ● Noted. It is considered that the amended Decision-Making Criteria for Policies 10d and the Site-Specific Decision-Making Question 10c would enable the issue of open space to be considered. ● Noted. It is considered that Decision-Making Criteria for Policies 3b would enable this issue to be considered. ● Noted. The SA report will identify the significant environmental effects and will look at mitigation measures and indicators. ● As above.
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<ul style="list-style-type: none"> • As above. 	<p>indicators identified for each Objective or issue. The decision making criteria for site allocations and general policies could be expanded for some Objectives. Monitoring indicators should relate to the effects of the plan itself, not wider changes. Bespoke indicators should be chosen relating to the outcomes of development management decisions.</p> <ul style="list-style-type: none"> • Following monitoring indicators may be appropriate: <ul style="list-style-type: none"> ○ Biodiversity: <ul style="list-style-type: none"> ▪ Number of planning approvals that generated any adverse impacts on sites of acknowledged; ▪ biodiversity importance; ▪ Percentage of major developments generating overall biodiversity enhancement; ▪ Hectares of Section 41 biodiversity habitat delivered through strategic site allocations, and; ▪ Impacts of the plans and policies compared against management objectives of European Sites ○ Landscape: <ul style="list-style-type: none"> ▪ Number and size of new development within AONB/Heritage Coast with commentary on likely impact ▪ Number and size of redevelopment of properties within the AONB ▪ Assess changes to light levels as studied as part of the dark skies project and dark skies within the AONB ▪ Assess plans against management objectives of the AONB ▪ Assessed against noted features within the National Character Area and Local Character ▪ Area Profiles ○ Green infrastructure: <ul style="list-style-type: none"> ▪ Percentage of the city's population having access to a natural greenspace within 400 metres of their home ▪ Length of greenways constructed ▪ Area of open space, green infrastructure, Country Park created ▪ Hectares of accessible open space per 1000 population ▪ Number of new GI sites created to increase the GI network
<ul style="list-style-type: none"> • As above. 	
<ul style="list-style-type: none"> • As above. 	

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<ul style="list-style-type: none"> ▪ Number of GI sites expanded or significantly improved to enhance the GI network ▪ Number of green roof schemes planned or implemented ▪ Number of maintenance plans developed for GI sites ▪ Number of new sites designed to play a role in mitigating and adapting to climate change ▪ Number of masterplans which support GI development ▪ Number of GI sites created or enhanced within/next to a deprived area of the District ▪ Kilometres of multiuser route (bicycle and footpath) ▪ Kilometres of multiuser route (bicycle and footpath) enhanced ○ Climate Change: <ul style="list-style-type: none"> ▪ Could use data collected from sites where climate change will be an issue such as the ▪ condition assessment of SSSI ○ Water: <ul style="list-style-type: none"> ▪ Number of SUDS incorporated in new developments ▪ Number of water pollution incidents within the District ▪ Number and quantity of abstraction licenses within the District ▪ Number of developments with discharges to water courses ▪ Nitrate concentrations within rivers ▪ Phosphate concentrations within rivers ▪ Number of water bodies with high, good, moderate, poor or bad status as defined by the Water Framework Directive ○ Soils: <ul style="list-style-type: none"> ▪ Area of BMV Agricultural Soils lost ○ Air: <ul style="list-style-type: none"> ▪ Number of protected sites which exceed their Critical Loads ▪ Number of developments with discharges to air ▪ Quantity of Local Authority Emissions (DBEIS) ▪ Quantity of greenhouse gas emissions ● Cumulative impacts <ul style="list-style-type: none"> ○ Look forward to reviewing the cumulative impact assessment methodology. ● Habitats Regulations Assessment (HRA) 	<ul style="list-style-type: none"> ● As above. ● As above. ● As above. ● As above. ● As above. ● As above. ● Noted. Cumulative effects will be taken into account as part of the SA process. This is detailed in the SA template. ● Noted. A separate Habitats Regulations Assessment will be undertaken as part of the Local Plan process. The Sustainability Appraisal should take account of the findings of a Habitats Regulatory Assessment.
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<ul style="list-style-type: none"> ○ Trust a separate HRA will be prepared with conclusions and recommendations informing the SA. 	<p style="text-align: center;">Indigo (ref: DSR18)</p> <ul style="list-style-type: none"> ● Consider that the SA Framework for the Site Allocations is ambiguous in places, leading to difficulty in assessing individual sites accurately; speculative and seemingly dependent on the final design of a scheme; not sophisticated enough to appreciate the changing dynamics of how people travel and obtain goods today and disproportionately weighted so that some themes and objectives such as Environmental and Land, Water and Soil Resources offer more points than what we would contend is more important, Housing and Economic and Economic Activity and Education criteria. ● Some of the framework questions are ambiguous and subjective, not making it clear what the required response is or how to grade a response. For example, under 'Overarching Sustainability Theme – Environmental, Will it (being the Site Allocation) use land efficiently?' The decision making criteria refers to different locations such as within settlements, adjacent to settlements or remote locations. Using land efficiently also relates to how the site is developed e.g. is it low or high density. However, the question only deals with one element of using land efficiently. ● The subjectivity in some questions means that there will be numerous potential answers to questions. For example, 'will it contribute towards enhancing or increasing green infrastructure networks?' Much will depend on the resultant development not necessarily the location of that development. There may also be loss of green infrastructure from the development but this is mitigated by on-site provision. A possible solution is to provide more guidance in the decision making criteria. ● Consider that too many of the answers are dependent on the design of any development scheme. There is potential for many improvements to the environment and social well-being for example but this will depend on the scheme delivered. The SA needs to remove as much ambiguity as possible to enable meaningful comparison and unnecessary criticism.
	<ul style="list-style-type: none"> ● Noted. The SA Framework has evolved since the version in the Draft Report, including incorporating additional Policy Criteria, Site Questions and response options (++ and --). The baseline information provided in the SA Scoping Report draws out the key issues and problems that the Framework should seek to address across all stands of sustainable development, taking into account the District as a whole. ● Noted. Taken into account when the framework has been updated. ● Noted. It is considered that the amended Decision-Making Criteria for Policies 7a and the Site-Specific Decision-Making Question 7a would enable the issue of green infrastructure to be considered. The SA responses have been amended to provide clarification during the decision-making process and an additional 'mixed effect' response option has been included in the Framework. ● Noted. Comments welcomed and were taken into account when finalising the Framework, which has evolved since the version in the Draft Report.

H Stage 1d Consultation Summaries

<ul style="list-style-type: none"> The assessment should better appreciate the changing dynamics of how people travel and obtain goods today. E.g. broadband connectivity and within sufficient proximity to supermarkets enable grocery deliveries. The ability to work from home and part-time working mean that less people need to be close to where they work. Consider that the Framework disproportionately scores environmental matters more highly than economic and social aspects. E.g. the Environment section allows for up to 36 + scores, whereas Housing only provides two, and Economic Activity and Education 8 +, and the Economic arm of sustainability only providing for up to 10 + points. Consider that there needs to be a finer gradation of scoring. E.g. a development of 50 houses will have a lower contribution towards housing provision than a development of 200 houses. Furthermore, a binary response to the use of higher grade agricultural land will not appreciate whether it involves only one hectare or 20 hectares. The impacts will be different and require a different score. Environmental: Will it enhance the landscape character of the area? <ul style="list-style-type: none"> Objective number 4 has a question on landscape character of the area which appears to specifically require its impact on heritage assets. This should be judged on impact on landscape character and not on heritage (Objective 4). Social: Will it improve access to essential services such as health facilities? <ul style="list-style-type: none"> Although the question only uses health facilities as an example of an essential facility, it then goes on to only use health facilities as a barometer for all essential services. The answer should allow for access to all essential services. The HEELA names schools, healthcare services, retail and local employment. Furthermore, the response determines access to this service by way of adjacency or inclusion within the built up area. Cleary access should be determined by distance or travel time (Objective 5). 	<ul style="list-style-type: none"> Noted. Additional Decision-Making Criteria for Policies 16a and 16c and the Site-Specific Decision-Making Question 16a and 16c would enable the distribution of goods and key communications infrastructure to be considered. Noted. No action recommended. The SA Framework draws out the key issues and problems that the Framework should seek to address across all stands of sustainable development. The proposed responses do not score, but seek to draw out the advantages and disadvantages and allow an evaluation between policy and site options. Noted. No action recommended. There are three dimensions to sustainable development and the SA Framework questions will help to tease out potential effects to enable a balanced judgment to be made on the options put forward. Noted. Amended.
<ul style="list-style-type: none"> Overall consider the SA refers to all the policies and plans required. 	<ul style="list-style-type: none"> Noted. Access to local services is considered under the Healthy and Inclusive Communities theme and the Infrastructure and Accessibility theme. In particular, it is considered that amended Decision-Making Criteria for Policies 10c, 10f and 16b and Site Specific Decision-Making Questions 10b, 10e and 16b would enable the issue to be considered. Wording of the Objectives, Criteria and Questions have been considered to avoid duplication and provide clarity of decision-making questions.
<p style="text-align: center;">Environment Agency (ref: DSR19)</p> <ul style="list-style-type: none"> Noted. Support welcomed. 	

Stage 1d Consultation Summaries H

<ul style="list-style-type: none"> • Q2a & Q2b- Flood Risk: <ul style="list-style-type: none"> ○ Climate change allowances applied to flood risk and planning applications have recently changed (published February 2016) and consider a range of allowances for each river basin district. The new allowances are an important consideration in the sustainability and location of new development. ○ The SA states that as a result of climate change, peak rainfall intensity and peak river flow are expected to increase by 20%, this is an extract from the old climate change allowances. The new guidance should be referenced, as the biggest allowance is now a 65% increase in peak flow (para. 6.2.2.5). ○ The SA refers to a number of maps included in the report. This provides a good illustration of the flood risk posed to the district. However, the climate change allowances considered in Map 5 & 7 will not incorporate the new climate change allowances. The maps only consider the addition of climate change on Flood Zone 3a (1 in 100 or 1 in 200 year flood extent), it does not consider climate change in the extreme 1 in 1000 year event (para. 6.2.2.7). • Q3a & Q3b- Flood Risk: <ul style="list-style-type: none"> ○ Flood Defence Consents (FDC) have changed and now fall under the Environmental Permitting Regulations (England and Wales) 2010. Individuals may now require a flood risk activity permit rather than a FDC. Environmental Permitting Regulations take a more risk based approach that enables us to focus regulatory effort towards activities with highest flood or environmental risk. Lower risk activities will be excluded or exempt and only higher risk activities will require a permit. Link provided. • Q4a- Flood Risk: <ul style="list-style-type: none"> ○ The Sustainability Indicator suggests that sites within Flood Zone 2 or 3a including climate change would have a neutral impact upon sustainability. Development should not be located in areas at risk of flooding unless it has passed the sequential and exception tests. It is important to note that the impact of a development within these flood zones will only be neutral if it is designed correctly in line with the NPPF and PPG and mitigation is put in place to manage the risk. Mitigation measures such as raised floor levels, depending on the vulnerability of the development may be required. It is 	<ul style="list-style-type: none"> • Noted. No action recommended. The SA Framework will allow the assessment of different policy options, including those around flooding. • Agree. The information in respect of peak flow has been updated to reflect the new climate change allowances. • Noted. The Local Plan will be informed by the updated SFRA (2017). • Noted. No action recommended. This is considered to be useful information but not something that needs to be included in the SA Scoping Report. • Noted. It is considered that Decision-Making Criteria for Policies 4c and Site Specific Decision-Making Question 4a will enable flooding to be considered. Flood issues would be considered in the full site assessment process and a new 'mixed effect' option has been added to consider situations including the effect when parts of a site lies within different flood risk zones. A North Norfolk Strategic Flood Risk Assessment (Level 1) has been produced.
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H Stage 1d Consultation Summaries

<p>our understanding that you are updating your SFRA, it is important this is used to support the allocations of sites in the flood zones (Table 14, pp. 88).</p> <ul style="list-style-type: none"> • Q2a & Q2b- Coastal Management: <ul style="list-style-type: none"> ○ Agree with data contained in the scoping report. • Q3a & Q3b- Coastal Management: <ul style="list-style-type: none"> ○ Should consider the future 'Coastal Change Management Areas', as required by Paragraph 071 of the NPPF PPG (7-071-20140306) states that Coastal Change Management Areas should be identified in the local plan. • Q4a- Coastal Management: <ul style="list-style-type: none"> ○ North Norfolk is likely to be affected by physical change to the shoreline through erosion, coastal landslip, permanent inundation or coastal accretion. Paragraph 072 of the NPPF PPG (7-072-201403060) states 'A Coastal Change Management Area will only be defined where rates of shoreline change are significant over the next 100 years, taking into account climate change. They will not be defined where the accepted shoreline management plan policy is to hold or advance the line (maintain existing defences or build new defences) for the whole period covered by the plan, subject to evidence of how this may be secured'. The definition of these areas is particularly important in areas where policy changes to managed realignment or no active interventions are planned with the medium term (year 2025 onwards). • Q2a & Q2b- Water Quality <ul style="list-style-type: none"> ○ The River Bure and Wensum catchments are covered by Surface Water Safeguard Zones. There is currently one Groundwater Safeguard Zone for the Anglian Water public water supply abstraction at Glandford. Further safeguard zones may be delineated in the future. These non-statutory zones are a joint initiative between the water companies and the EA to address pollution issues. <p>Q3a- Water Quality</p>	<ul style="list-style-type: none"> • Noted. Support welcomed. • Noted. The approach to coastal erosion will be developed through the Local Plan. • Noted. The approach to coastal erosion will be developed through the Local Plan. • Noted. The additional information provided by the EA has been included within the Climate Change, Energy, Air Quality & Pollution Chapter. • Noted.
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Stage 1d Consultation Summaries H

<ul style="list-style-type: none"> ○ As outlined in document, would support policies to limit nitrate pollution through good agricultural practice in order to protect water quality (para. 6.2.2.17). ● Q4a - Water Quality <ul style="list-style-type: none"> ○ Paragraph 6.2.2.25 states ‘...incorporate opportunities such as Sustainable Urban Drainage Systems (SUDS), which can also provide opportunities for biodiversity and amenity enhancement.’ Infiltration SuDS can increase groundwater recharge but groundwater quality must be considered in design of SUDS. Input of hazardous substances (such as highways) may require an environmental permit in areas of shallow groundwater or in high environmental risk areas with respect to groundwater. Would discourage the use of deep infiltration systems such as boreholes where other methods of disposal are possible (Para. 6.2.2.25). ○ Would promote policies that reduce the use of domestic water usage. Should be considered for all development in line with the water cycle study. ● Q2a & Q2b- Contaminated Land <ul style="list-style-type: none"> ○ Consider that there is a significant quantity of Previously Developed Land (PDL) available and there should be encouragement to develop Brownfield land / PDL. Would encourage the use of brownfield land and remediate to remove contaminants to an acceptable level (para. 6.1.2.1 & 6.2.2.23). ● Q3a & Q3b- Contaminated Land <ul style="list-style-type: none"> ○ For the majority of cases the constraints posed by land affected by contamination can be overcome. By encouraging development on such land, the risk to public health and environment degradation can be mitigated. ● Q4a- Contaminated Land <ul style="list-style-type: none"> ○ Would like to see a bigger commitment for encouraging the development of PDL. Many sites exist over the District which if left undeveloped will pose a continued risk to public health and the environment and may require public money to remediate if found to be causing a significant on-going problem. 	<ul style="list-style-type: none"> ● Noted. No action recommended. This is useful information but not something that needs to be included in the SA Scoping Report. ● Noted. No action recommended. The SA Framework will allow the assessment of different policy options, including those around domestic water usage. ● Noted. No action recommended. The SA Framework will allow the assessment of different policy and site options, including those around Brownfield / PDL land and contamination. ● Noted. No action recommended. The SA Framework will allow the assessment of different policy and site options, including those around contamination. ● Noted. No action recommended. The SA Framework will allow the assessment of different policy and site options, including those around contamination.
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H Stage 1d Consultation Summaries

In addition to the above, a further response was received considered to be unrelated to the SA Scoping Report consultation and instead related to support a Call for Sites submission. It was agreed with the stakeholder that the response sent would be filed with the relevant Call for Sites submission.

Draft SA Scoping Report - Schedule of Comments (Consultation 10 October – 21 November 2016)

Figure 25 SA Draft Scoping Report Schedule of Comments

Stage 1d Consultation Summaries H

I Stage 1d Consultation Evidence

Appendix I: Stage 1d Consultation Evidence

I.1 Example Correspondence

10 October 2016



Dear,

**North Norfolk Emerging Local Plan
Draft Sustainability Appraisal Scoping Report: Invitation to make
Representations**

I am writing to advise you that as part of the emerging Single Local Plan the Council has undertaken a scoping exercise in order to inform the Sustainability Appraisal of the emerging Plan and is conducting a consultation with the relevant prescribed bodies and other interested parties.

The consultation period starts on **Monday 10 October 2016** and will run for a period of 6 weeks until **Monday 21 November 2016**.

The document can be found on our website at: <http://www.north-norfolk.gov.uk/planning/21118.asp>

You can respond to us via email or post:

- planning.policy@north-norfolk.gov.uk
- Planning Policy Team, NNDC, Holt Road, Cromer, NR27 9EN.

When you respond to this consultation, we would appreciate your comments on the following questions:

- 1. Identification of other Relevant Policies, Plans and Programmes and Sustainability Objectives**
 - a. Are there other documents specifically relevant to the single Local Plan that we should take into account?
 - b. Have we adequately taken account of those listed?

Continued...

Stage 1d Consultation Evidence I

2. District 'Baseline' Information and Key Sustainability Issues and Problems

- a. Can you suggest (or provide) any other relevant information?
- b. Have we identified the main sustainability issues relevant to the single Local Plan?

3. Sustainability Objectives and Appraisal Questions

- a. Do you agree with the objectives and questions we have identified?
- b. What additional decision making criteria do you think are relevant to the SA of the Single Local Plan, (overall strategic /policy assessment and site appraisal)

4. Sustainability indicators

- a. We welcome your comments on our initial ideas for indicators and data sources as well as suggestions for others. These should be appropriate for the assessment of particular development sites and policies.

If you have any queries on the above, then please feel free to contact us.

Yours sincerely,

Martha Moore
Planning Policy Officer
01263 516084

Iain Withington
Planning Policy Team Leader
01263 516034

Figure 26 Invitation to Comment on the Draft SA Scoping Report

Stage 1d Consultation Evidence

I.2 News Release

The screenshot shows the North Norfolk District Council website. At the top right, there is a link for "Site Information & Cookies | Home". The main header features the council's logo on the left and the text "Council & Democracy" in a large font on the right. Below the header is a search bar with a "GO" button. A vertical navigation menu on the left lists various council services: Benefits, Business & Economy, Community & Wellbeing, Council & Democracy (highlighted), Council Tax & Rates, Environment & Waste, Housing, and Planning & Design. Below this menu are sections for "Contact Details" (listing council offices at Holt Road, Cromer, Norfolk, NR27 5EN) and "Social media" (with a "streetlife.com" logo and social media icons for Facebook, Like, Share, and 1.2k followers). The main content area displays the breadcrumb "You are here : Home > Council & Democracy > Council Information > Latest News" followed by the "Latest News" section. The featured article is titled "Consultation on the Draft Sustainability Appraisal Scoping Report" and is dated "18 October 2016". The text explains that the council is preparing a new Local Plan and that this appraisal is a key part of that process. It includes a photograph of a building. To the right of the main article is a "Council Information" sidebar with links to Corporate Leadership Team, Corporate Plan 2015-16, Insurance/Compensation Claim, Map of Wards and Parishes, National Fraud Initiative, Performance, Risk, Latest News, and Facts and Figures (Transparency Data). Below that is a "Latest News" sidebar with several recent news items, including "Solar Power Crushes Cromer Litter - 28 February 2016" and "Council Gains Gold in International Employers' Award - 20 January 2016". At the bottom right, there is a contact information box for journalists, providing a phone number (01263 516059) and an email address (media@north-norfolk.gov.uk).

Figure 27 SA Scoping Report News Release (Captured 19 October 2016)

Stage 1d Consultation Evidence |

I.3 Example Social Media Promotion



Figure 28 SA Scoping Report Twitter Tweet (19 October 2016)

Stage 1d Consultation Evidence

I.4 NNDC Website Coverage

The screenshot shows the North Norfolk District Council website. At the top right, there is a link for 'Site Information & Cookies | Home'. The main header area features the council's logo on the left and the text 'Planning & Design' on the right. Below the header is a search bar with a 'GO' button. A vertical navigation menu on the left lists various council services, with 'Planning & Design' highlighted. The main content area has a breadcrumb trail: 'Home > Planning & Design > Planning Policy > Emerging Local Plan > Procedural documents > Draft Sustainability Appraisal Scoping Report: Consultation Version'. The title of the page is 'Draft Sustainability Appraisal Scoping Report: Consultation Version'. The text explains that this report is part of the preparation for the Emerging Local Plan and is a Sustainability Appraisal (SA). It mentions that the report is available to view below and that paper copies are available in local libraries or at council offices in Cromer and Fakenham. A prominent yellow button with a download icon offers the 'Draft Sustainability Appraisal Scoping Report' in PDF format, which is 7.33mb in size. To the right of the main text, there is a 'Procedural documents' section listing 'Local Development Scheme (LDS)', 'Statement of Community Involvement (SCI)', and the current 'Draft Sustainability Appraisal Scoping Report: Consultation Version'. Below this is a 'Take our quick survey' section with the question 'Did you find this page useful?' and three response options: 'Yes' (with a green checkmark), 'Not sure' (with a red minus sign), and 'No' (with a red X). At the bottom of the page, there are social media links for 'streetlife.com' and '@NorthNorfolkDC', along with Facebook 'Like' and 'Share' buttons. A footer note states that comments should be submitted to planningpolicy@north-norfolk.gov.uk or by post to the Planning Policy Team, NNDC, Holt Road, Cromer, NR27 9EN. A final note asks users to contact the Policy team by email or on 01263 516318 for further information.

Figure 29 SA Scoping NNDC Website Consultation Information

Stage 1d Consultation Evidence |

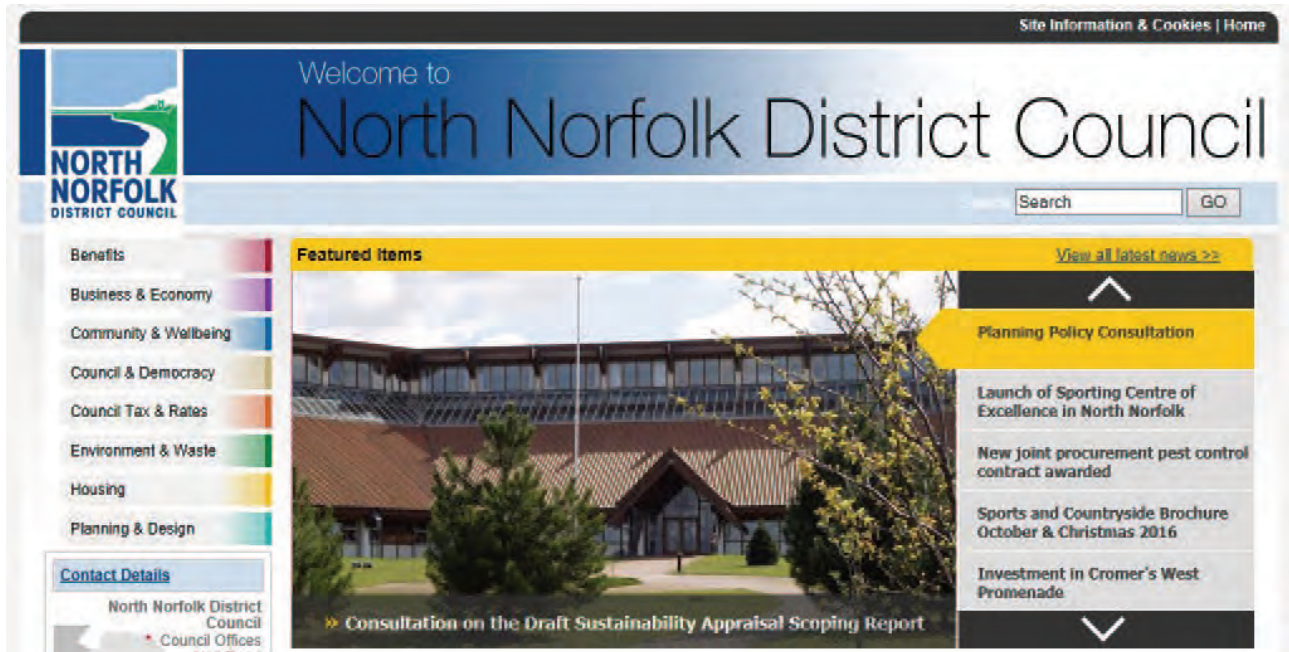


Figure 30 SA Scoping Report Featured Item on NNDC Homepage (captured 20 October 2016)

Stage 1d Consultation Evidence

I.5 The 'Purpose of this report and how to use it' Chapter

Draft Sustainability Appraisal Scoping Report: Consultation Version 7

Purpose of this Report and how to use it 1

1 Purpose of this Report and how to use it

- 1.0.1** This document has been published for consultation. Following the consultation it will be updated and modified to reflect comments received. It will be used to devise a final Sustainability Appraisal process against which emerging Local Plan policies and site allocations will be tested.
- 1.0.2** We are seeking comments on any aspect of the document but are particularly keen to hear if:
- You are aware of any more up-to date information which we should be considering?
 - You consider we have identified the right sustainability criteria against which to assess the emerging Local Plan?
- 1.0.3** The document is organised under a number of key themes. For each theme we have identified a range of existing information sources, prepared a summary of the issues faced by the District in relation to that theme and identified key criteria against which to assess the sustainability of the new plan. These criteria are brought together at the end of the document in draft Sustainability Appraisal matrix.

This Consultation

- 1.0.4** Consultation on this Draft Sustainability Appraisal Scoping Report includes:
- Sending details of how to access the Document (Environmental Report) to the prescribed bodies under Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004.
 - Consulting other relevant bodies.
 - Notifying all organisations on the North Norfolk Local Plan consultee database (including town and parish councils in and adjoining the District) by newsletter, post or email that the document is available on the Council's website for comment.
 - Making the Document available for inspection at the Council Offices and at local libraries.

How to Respond to this Consultation

- 1.0.5** The consultation period starts on **Monday 10 October 2016** and will run for a period of six weeks to **Monday 21 November 2016**.

The document can be found on our website. You can respond via email or post:

- Website: <http://www.north-norfolk.gov.uk/planning/21118.Asp>
- Email: planning.policy@north-norfolk.gov.uk
- Post: Planning Policy Team, NNDC, Holt Road, Cromer, NR27 9EN.

If you have any queries on the above, then please feel free to contact us.

When you respond to this consultation, we would appreciate your comments on the following questions:

1 Identification of other Relevant Policies, Plans and Programmes and Sustainability Objectives

- a. Are there other documents specifically relevant to the single Local Plan that we should take into account?
- b. Have we adequately taken account of those listed?

Stage 1d Consultation Evidence I

8 Draft Sustainability Appraisal Scoping Report: Consultation Version

1 Purpose of this Report and how to use it

2 District 'Baseline' Information and Key Sustainability Issues and Problems

- a. Can you suggest (or provide) any other relevant information?
- b. Have we identified the main sustainability issues relevant to the single Local Plan?

3 Sustainability Objectives and Appraisal Questions

- a. Do you agree with the objectives and questions we have identified?
- b. What additional decision making criteria do you think are relevant to the SA of the Single Local Plan, (overall strategic /policy assessment and site appraisal)

4 Sustainability indicators

- a. We welcome your comments on our initial ideas for indicators and data sources as well as suggestions for others. These should be appropriate for the assessment of particular development sites and policies.

Figure 31 Purpose of report and how to use it

J Stage 1e Consultation Summaries

Appendix J: Stage 1e Consultation Summaries

Summary of Comments / Issues Raised (including page / paragraph number)	Council Response and Action / Recommendation
Natural England	
<ul style="list-style-type: none"> Under Regulation 61 of the Conservation of Habitats and Species Regulations 2010 an appropriate assessment needs to be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site. <p>Other European sites which could be included within the HRA scoping document include:</p> <ul style="list-style-type: none"> Greater Wash potential SPA Outer Thames Estuary SPA 	Noted - These sites have been added to the Draft Scoping Report May 2017.
<ul style="list-style-type: none"> It is recommended that the recent visitor survey assessments completed by Footprint Ecology are assessed and included in the evidence base for the HRA. 	The impacts from increased recreation and leisure pressures is mentioned throughout the report, not least in para. 8.3 and the Study on Visitor Numbers undertaken by Footprint Ecology forms part of the evidence base.
<ul style="list-style-type: none"> Natural England strongly recommends that the Council adopts a strategic solution to address the impacts of recreational damage and disturbance to European sites, to align with the approach currently taken by other neighbouring authorities, and as part of the Council's Duty to Co-operate. We would advise the development of a Monitoring and Mitigation Strategy to identify and mitigate any residual effects to Natura 2000 sites, as designated under the Habitats and Species Directive. 	Noted. This work is being brought forward through the Duty To Co-operate and the Norfolk Strategic Framework.
<ul style="list-style-type: none"> We welcome that Section 5.3 of the scoping document considers neighbouring Districts/Boroughs and states that 'North Norfolk District Council borders King's Lynn and West Norfolk Borough Council, Breckland District Council, Great Yarmouth District Council, Broadland District Council and the Broads Authority'. 	Support Welcomed.

Table 34 HRA Scope Summary of Comments

Stage 1e Consultation Summaries J

K Stage 1e Consultation Evidence

Appendix K: Stage 1e Consultation Evidence

Stage 1e Consultation Evidence K

L Stage 1f Consultation Summaries

Appendix L: Stage 1f Consultation Summaries

Local Plan Viability Workshop - Record of Main Discussion Items

Individual invitations to promoters, landowners and developers that had land interests in the emerging Local Plan or who were known to be active in the District were sent out. Twenty-eight (28) replies were received with an additional 2 declining. Including Council Officers and the consultants Nationwide CIL Services (NCS) 36 people attended the event. Full detail of attendance is included below.

A short update was given on progress around the emerging Local Plan and its time lines prior to a presentation by NCS on the viability work done so far. Following the detailed presentation on the background requirements for local plan viability by Consultants NCS, the guidance and policy requirements, methodology, and initial results a group discussion raised a number of considerations.

The event concluded two principal issues – low build cost and high land value - as a way forward it was agreed that further iterations of the study should reflect changes in guidance and revised build costs and that the Council would take a view on the appropriate levels following the submission of any relevant and justified cost information. The end of the September was agreed as a suitable time period.

One response was subsequently submitted on behalf of Hopkins Homes Lovell Partnerships Limited and Wellington Construction. The response highlighted the recent clarifications in the NPPF and Planning Practice Guidance which it was suggested will need to be considered in future iterations of the report as well as providing commentary on some of the assumptions and providing some useful factual information on build costs around the District.

The main discussion items from the event are detailed below:

- A Limited number of attendees strongly expressed the opinion that the build costs review had underestimated the current build costs associated with development and that this would have an impact on the emerging results. It was explained that the initial build cost work undertaken to inform the study was undertaken late 2017 By Gleeds. At the time developers had been contacted by Gleeds and given the opportunity to input into the findings, though not all chose to engage at that time.

The initial rates adopted in the study were based on research of local construction projects to the region, the costs associated with these and Gleeds own national database of construction costs by construction type. They related more to new build estate housing and were cross referenced to any local data made available to Gleeds through direct consultation with developers and to median BCIS levels. It was explained that this was seen as a realistic approach which reflected average costs over the District in relation to larger developers of regional and national scale. It was acknowledged that the rate used fell below the median BCIS rates and that there had been significant increases in costs (and values) in the last eighteen months in the construction industry and since work on the initial cost reports was undertaken.

It was explained that with Plan wide viability seen as a transparent and iterative process by the Council; the purpose of the event was to provide a further opportunity for those with land interests in the District to express their views on not only the assumptions used but on the overall methodology and the results including Benchmark land value. In response to the challenge on build costs it was agreed that submissions of any further evidenced build cost information would be welcomed. This was acknowledged by those expressing concern who clarified that they would seek to submit build cost data in the period between now and the end of September 2018.

The Council welcomed this and acknowledged that given the concerns raised around the low build costs the implications of increased build costs would be considered further. It was further explained that given the rises in build costs and values the expectation was that the study would be refreshed at a suitable time down the line in order to stay up to date, and prior to examination. This would provide a further opportunity for the Council to sense check the emerging policies in the Local Plan against deliverability requirements of the NPPF but at the appropriate time, and not subject the Council to undue additional evidence costs in the interim period.

It was suggested by some that build costs specifically in North Norfolk were above BCIS costs recorded and that the study should reflect even higher costs. The figure of £1,600sqm was quoted as not unusual. It was pointed out this was substantially higher than the evidenced BCIS rates of £1286sqm for 2 story estate housing (including Cat 2 adaptable/accessible) and that the study had to adopt a broad high level approach rather than focus on differences between individual developers' business models and site specific costs. A discussion was also held around what parameters the build costs used in the study incorporate as well as the separate fees and allowances.

Going forward it was suggested that increased build costs were tested in the model.

Stage 1f Consultation Summaries L

Local Plan Viability Workshop - Record of Main Discussion Items

- There was acceptance of the overall approach around the use of typologies, EUV+ and that the establishment of the benchmark value based on a 50:50 Shinfield approach. A specific question resulted in acknowledgement that this was reflected in guidance with further acknowledgement that any increase in build costs would have the potential to lower the benchmark value to landowners used in the study - This was accepted and welcomed by those in the room as they were concerned that the values reported were high, however some said real transaction prices should be used rather than benchmarking.
- A view expressed by some developers in the room was that only the bottom line and profit margin was their only concern.
- The assumptions around the remaining costs associated with the model such as sales, marketing, financing, legal etc. along with profit levels (20 %GDP) for market housing were not challenged, though a lower profit margin of 17.5% reflecting lower risk in the west of the District was discussed.
- Sales values were thought to be conservative by the consultants and when considered they were not questioned by those present. It was pointed out that increasing build costs to reflect higher specifications and market preference could lead to the study adopting higher average sales costs in the next iteration.
- Assumptions around the approach to affordable housing, tenure split, density and costing of the emerging policy approaches was not questioned.
- One person thought that the existing use value of agricultural land at £20,000 ha was too low. This was based on a perceived increase in desirability of the coastal area and reflected the wide variation of the price paid for agricultural land across the District. It was thought by NCS that any specific higher transactions in the AONB / Coastal countryside could have generally been based on other non-commercial reasons. The level assumed in the study was an average price which has generally been accepted at examinations as appropriate for this level. It was subsequently demonstrated through a worked example that significantly increasing this base line cost of the existing use value (£60,000) would have minimal impacts on the benchmark value and overall viability as the existing use value forms only a small percentage of the overall gross residual value, GRV. This was accepted in the room where it was explained that in Plan Wide Viability there is a requirement to take a balanced approach on general assumptions typical across the District.
- NCS explained that the brownfield existing use value was based on low value commercial use existing on any brown field site.
- The existing lower delivery rates of Affordable housing were suggested as a reason as to why the higher rates identified as viable were too high, (25% zone 1 & 45% zone 2). It was suggested that the District has on average an affordable housing delivery of 20% despite a policy requirement of 45% on schemes of 10 or more in the principle and secondary settlements. It was pointed out that the historical rates were distorted by the Housing Delivery Incentive scheme which for a number of years has allowed for a reduced delivery of affordable housing (20%) (Recently increased to 25%). This scheme was not based on viability but an incentive to speed delivery in a period of economic downturn which has since improved and therefore the Council should / could be asking for more affordable housing. Most developers / larger sites in the District had taken advantage of this in the District, (the submission of a viability assessment has not been a requirement to date).
- At this time the viability study shows the viable percentages of affordable housing and the viability margin at those levels. Going forward the affordable housing policy rates would be set and consulted on according to the geographical zones identified but the rate would also need to take account of the site size thresholds, level of identified need and the geographical distribution of proposed site allocations. This work was ongoing.
- Questions around the amount of contingency costs built into the model, specifically site specific infrastructure costs were raised. In general more clarity was sought around the specific inputs and in particular s106 levels of £3,000 per dwelling. It was suggested that the study should also include an allowance for externals. It was confirmed that this figure originated from a review of contributions across the major sites undertaken by the Council. No alternative amounts were suggested from promoters in the room.
- Although the study is based on typologies the study then details the viability margin of emerging strategic sites with the specific details submitted into the appraisal but utilising the typology assumptions. This is intended to show the broad viability margin of the emerging sites. It was suggested that where site specific costs are known at the time such as in the Rudham Stile Lane site, costs should be incorporated into the study and that these will be supplied by Savills as further evidence. It was acknowledged that the Council is working with site promoters specifically Savills in North Walsham with the intention to understand the infrastructure costs associated with the large strategic extension. Depending on the outputs for this work from Savills there may be a requirement for further detailed appraisals to be commissioned. Although not pointed out at the time the Rudham's lane site (phase 1) is currently subject to a live planning application and will not form part of the emerging local plan. It is reasonable for the Council to conclude that any further phase 2 allocation would therefore benefit from such infrastructure (new access roads, and off site road improvements) and therefore these additional site specific costs should not at this stage be included in any high level study covering Plan wide viability for the Rudham Stile Lane site phase 2. It may also be the case that for the larger scale projects additional sources of funding could contribute to the provision of infrastructure. This could come from a multitude

L Stage 1f Consultation Summaries

Local Plan Viability Workshop - Record of Main Discussion Items

of sources including the Council reserves, Local Enterprise Partnership, Norfolk County Council and or Government Housing and Infrastructure bids.

- A developer suggested that the study should have additional costs associated with addressing surface water issues and off site provision of footpaths as these were considered necessary but abnormal costs.
- The purpose of the study is to demonstrate that the majority of the sites put forward are viable and the quantum of development proposed will be deliverable, (viable). Going forward it was agreed that there will be a requirement to update the study in relation to changes in market conditions as well as evidence supplied prior to submission. This could include an updated base cost review and value review. NCS and the Council concluded that such a review was best done nearer the time of submission for various reasons including effective use of Council financial resources but also to ensure the study utilised the most up to date information at the time of examination.

After the event an opportunity was given to developers, agents and site owners to discuss site specific issues with the relevant reviewing officer. Many took up this opportunity.

Outcome

The study appraisals were subsequently re run with updated assumptions in relation to the suggestion of increased build costs along with a review of other inputs. The revised costs are based on independent data provided through BCIS as advised in the updated Planning Practice Guidance. The study adopts BCIS, general two storey median rates, Sept 18 of £1180 and adds 15% for external costs for houses and 10% for apartments. A further £10 sqm is added for category 2 Accessible and adaptable housing. Section 106 contributions were reviewed in light of the additional inclusion of costs for externals and in line with the updated and refinement of the policy requirements in the emerging allocations. A sum of £2,300 per dwelling is used. A 17.5% developers profit is used, reflecting the reduced risk of building in North Norfolk. The revised study also reflects the areas of higher value outside the main indicative zones. The affordable housing mix was reviewed to ensure it remains NPPF (July 2018) compliant and reflect the more realistic requirements of North Norfolk. The larger strategic typologies include a requirement for flats which are now based on the lower national space standard of 50 sqm for a 1 bed rather than a 2 bed.

No other assumptions e.g. sales values, fees, finance, policy costs etc. have at this stage been amended or updated. Given the iterative nature of the study work reviewing values as well as costs and reflecting the actual proposed affordable housing policy percentage would be best undertaken at a stage nearer the examination in order to stay up to date.

Table 35 Local Plan Viability Workshop - Record of Main Discussion Items

Stage 1f Consultation Summaries L

M Stage 1f Consultation Evidence

Appendix M: Stage 1f Consultation Evidence

Plan Wide Viability Workshop: Invitation Letter



Mr M Ashwell
 Planning Policy Manager
 North Norfolk District Council
 Cromer Norfolk
 NR27 9EN

27/07/2018

Email ian.withington@North-norfolk.gov.uk
 Tel: 01263 516034

Our Ref LP0506013

Dear Development Partner

Land Allocations and Local Plan viability Study

As part of the preparation for the emerging Local Plan preparation and in line with the NPPF, NNDC commissioned Nationwide CIL Services, NCS, to undertake a Plan Wide Viability study to appraise the viability of the emerging North Norfolk Local Plan in terms of the impact of its policies on the economic viability of the development expected to be delivered during the planned period 2016 – 2036. The study assesses the value of residential development and all the costs associated with its development as well as the cost of policy impacts such as affordable housing. The District Council wishes to ensure that land allocated for development is likely to be developed in a reasonable timescale. The viability of development in the context of the proposed policies of the Local Plan is therefore an important consideration as part of the delivery of the strategy as a whole.

The purpose of this letter is to invite you to a consultation and workshop event on Wednesday 29th August 2018 - 2 pm in the committee room at North Norfolk District Council to review the emerging findings of the study with NCS and Council officers. We are inviting developers/land owners, agents and development professionals who are representative of those sites that are being provisionally proposed through the Local Plan or are currently active in the District. Where possible, the Council would like to agree the methodology and key assumptions in the study with representatives of the development industry. Prior to the event (1.15pm) a light buffet lunch will be provided.

The event will provide you with the opportunity to input into the study test the emerging assumptions and review the findings.

Please confirm you or a representative will attend by emailing ian.withington@north-norfolk.gov.uk by 10th August 2018.

An agenda will be provided to those attending in advance of the event. If you require any further information in the meantime please contact ian.withington@north-norfolk.gov.uk or 01263 516034 or Mark Ashwell mark.ashwell@north-norfolk.gov.uk.

Yours Sincerely

Iain Withington, MRTPI
 Planning Policy Team leader
 Attached background Information

Viability workshop invitation final

Figure 32 Invitation to Local Plan Viability Workshop

Stage 1f Consultation Evidence M

Plan Wide Viability Workshop: Attendance List

Organisation	Attendance	
NCS - Project Lead	Yes	-
NCS / HEB - Project Lead	Yes	-
NNDC - Project Lead	Yes	-
NNDC - Planning Policy Manager	Yes	-
NNDC - Head of Planning		No
NNDC - Housing Manager	Yes	-
NNDC - Senior Planning Officer	Yes	-
NNDC - Senior Planning Officer	Yes	-
NNDC - Senior Planning Officer	Yes	-
NNDC - Planning Monitoring Officer	Yes	-
NNDC - Project Support Officer	Yes	-
NNDC - Major Projects Manager	-	No
Indigo Planning	-	No
CBRE UK	-	No
Agent	Yes	-
Cornerstone Planning	Yes	-
Strutt & Parker	Yes	-
Landowner	-	No
Broadland Housing Association	Yes	-
NPS	-	No
Indigo Planning	-	No
Landowner	Yes	-
Landowner	Yes	-
Persimmon Homes	Yes	-
Hopkins Homes	-	No
Savills	Yes	-
Lovells	-	No
Bidwells	-	No
Strutt & Parker	Yes	-
Landowner	Yes	-
Landowner	-	No
Landowner	Yes	-

M Stage 1f Consultation Evidence

Organisation	Attendance	
Savills	-	No
Broadland Housing Association	-	No
Brown and Co	-	No
Landowner	Yes	-
Savills	-	No
Victory Housing Association	-	No
Savills	-	No
Armstrong Rigg Planning	-	No
Bidwells	-	No
Orbit Housing Association	-	No
Flagship Housing Association	-	No
Gladman Developments Ltd	-	No
Bidwells	Yes	-
Landowner	Yes	-
Henman Architects	Yes	-
Norfolk Homes	Yes	-
Landowner	Yes	-
Blakeney Housing Society	-	No
Saffron Housing	-	No
Woodrows	Yes	-
Woodrows	Yes	-
Persimmon Homes	-	No
WYG	-	No
Places for People	-	No
NPS	Yes	-
Landowner	-	No
Victory Housing Association	-	No
Define Planning & Design	-	No
Orbit Housing Association	-	No
Landowner	Yes	-
Pert & Barrell	-	No
Flagship Housing Association	-	No
Landowner	-	No

Stage 1f Consultation Evidence M

Organisation	Attendance	
Corylus	-	No
Brown and Co	-	No
Duchy of Cornwall	-	No
Landowner	Yes	-
Bullen Group	-	No
Brown and Co	-	No
Landowner	-	No
Lanpro	-	No
Landowner	-	No
Landowner	-	No
Bullen Group	-	No
Hopkins Homes	-	No
Bidwells	-	No
Landowner	-	No
Surveyor	Yes	-
Landowner	Yes	-
Landowner	Yes	-
Norfolk Homes	Yes	-
Landowner	-	No
Landowner	-	No
Landowner	-	No

Table 36 Attendance List for Local Plan Viability Workshop, 29 August 2018

M Stage 1f Consultation Evidence



Figure 33 Plan Wide Viability Workshop, August 2018

Stage 1f Consultation Evidence M

N Developing the Evidence Base & Site Selection Consultation Evidence

Appendix N: Developing the Evidence Base & Site Selection Consultation Evidence

NORTH NORFOLK DISTRICT COUNCIL
HOLT ROAD CROMER NORFOLK NR27 9EN
Telephone 01263 513811
Fax 01263 515042

www.north-norfolk.gov.uk



4 July 2017

Sent to all Parish & Town Councils

Dear Clerk,

Local Green Space Designations

As part of our preparation of a new Local Plan¹ we are writing to Parish and Town Councils to invite you to identify areas within your community which you would like to have considered for designation as a Local Green Space (LGS).

Introduced through the National Planning Policy Framework (NPPF) LGS designation is a way to provide special protection against development for green areas of particular importance to local communities. LGS can only be designated through the Council's Local Plan review or through Neighbourhood Plans. National policy states that any designation of LGS will need to be consistent with local planning for sustainable development and not be used to prevent development but to protect those areas of particular importance to the community.

We would therefore be grateful if you would give this matter your consideration at your July meeting and submit to us details of any areas that you feel are **demonstrably special** to your community and would like the planning policy team to assess for inclusion as LGS in the emerging Local Plan. We will need to be able to accurately identify where the areas of land that you submit are located, so inclusion of a highlighted map would be most helpful, along with a short description of why you feel the land should be designated.

Please could you submit details of your nominated areas (or advise us that you have not identified any areas) by 11 August 2017. Contact details are provided at the end of this letter.

The current Core Strategy (Local Plan) already identifies many local green spaces which you can view on our current Proposals Map. The intention is that these areas will also be subject to review as part of the emerging Local Plan, however please feel free to identify to us **all areas** that you wish to be considered.

What happens next?

Any spaces which are nominated will be assessed by the Council in accordance with the below criteria. Qualifying spaces will then be identified in our new Local Plan which will include a policy limiting the types of development which could take place.



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The Local Plan will be subject to public consultation and therefore local people will have the opportunity to comment on elements of the plan, including Local Green Spaces.

Criteria for designating a Local Green Space

Local Green Spaces may be designated where those spaces are demonstrably special to the local community. Examples of green areas could include outdoor recreation spaces, parks, public gardens, land where sports pavilions, boating lakes or where structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis.

The types of green area that may be identified as LGS also need to meet the criteria specified in paragraph 77 of the NPPF and the national [Planning Practice Guidance](#).

Paragraph 77 states that the LGS designation will **not** be appropriate for most green areas or open space. The designation should only be used:

- where the green space is in reasonably close proximity to the community it serves;
- where the green area is **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;
- where the green area concerned is local in character and is not an extensive tract of land.

In line with the requirements of the NPPF and national planning guidance any sites that you identify will be assessed by us against the requirements set out in the table below. In considering any areas for nomination we ask that you consider these assessment criteria.

Criteria	Explanation of Criteria / Questions to ask
It will rarely be appropriate to designate spaces that are the subject of a planning permission and or subject to existing designation	Local Green Space designation will rarely be appropriate where the land has planning permission for development. Exceptions could be where the development would be compatible with the planning permission or where planning permission is no longer capable of being implemented. <ul style="list-style-type: none"> • Is the space the subject of a planning permission for development? • Is the site already protected by an existing designation
It will not be appropriate to designate spaces that are allocated or proposed for development in the Local Plan or the emerging Local Plan.	The national Planning Practice Guidance states that: Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the LGS designation should not be used in a way to undermine this aim of plan making. <ul style="list-style-type: none"> • Is the space allocated or proposed to be allocated in a Local Plan? or

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	<ul style="list-style-type: none"> Has the site been put forward for development in any evidence based documents such as Housing and Economic Land Availability Assessment?
The space must not be an extensive tract of land and must be local in character.	<p>Blanket designation of open countryside adjacent to settlements is not appropriate.</p> <ul style="list-style-type: none"> Does the space or combination of adjoining spaces “feel” local in character and scale, in respect of the local community that the space serves? Is the proposed space larger than other areas of land in the vicinity? Is it contained with clearly defined edges? How does the space connect physically, visually and socially to the local area?
The space must be within close proximity to the community it serves.	<p>The space would normally be within easy walking distance of the community it serves.</p> <ul style="list-style-type: none"> How close is the space to the community it serves?
The space must be demonstrably special to the local community.	<p>Blanket designation of all/most green areas or open space within an area is not appropriate. The space must be demonstrably special by consideration of the following;</p> <p>The proposed space is of particular local significance and should meet one of the following criteria:</p> <ul style="list-style-type: none"> Beauty historic significance recreational value tranquillity richness of wildlife

Should you have any queries or require assistance please do not hesitate to contact us.

Sarah Tudhope

Planning Officer (Planning Policy)

01263 516011

sarah.tudhope@north-norfolk.gov.uk

Response by email is preferable, however if you wish to respond by post please address

to: Planning Policy, NNDC, Holt Road, Cromer, NR27 9EN

¹ The new Local Plan will provide the up to date planning policy context for development across the whole of North Norfolk. It will set out the policies against which planning applications will be assessed, including policies on housing, the economy, community facilities, safeguarding the natural and built environment, adapting to climate change and securing good design. The document will also allocate specific areas of land for development for housing and employment uses.

Figure 34 Local Green Space Designations - Letter to Parish & Town Councils (July 2017)

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NORTH NORFOLK DISTRICT COUNCIL
HOLT ROAD CROMER NORFOLK NR27 9EN

Telephone 01263 513811
Fax 01263 515042

www.north-norfolk.gov.uk



19 June 2018

Sent to all Parish & Town Councils

Dear Clerk,

**North Norfolk Local Plan:
Protecting our green spaces - new study published**

As part of the preparation of the new Local Plan the Council is reviewing the policy approach which will apply to the provision of new, and the protection of existing, green spaces of various types. The revised policy will aim to protect such areas from inappropriate types of development and/or limit development to specific types. This revised policy will be subject to consultation alongside the rest of the new Local Plan in early 2019.

In July 2017 the Council wrote to Parish & Town Council's and invited nominations for 'Local Green Space', designation. This is a new type of designation for areas considered to be demonstrably special to the community or of particular significance. Thank you to those of you that suggested possible sites.

Publication of Topic Paper

A topic paper has now been prepared which details the sites assessed through the review process including the 226 sites which were nominated by local communities as candidates for Local Green Space designation and shows our draft recommendations as to the type of designation that could apply. The topic paper will be used as an evidence document to inform the preparation of the new Local Plan and does not make final decisions as to which sites will be designated and for what purpose – these will be decisions for the draft Local Plan to consider. In reaching those decisions we will consider the demand and availability of land for other uses and the locations in which it is appropriate and necessary to designate green spaces in. The study is available at: www.north-norfolk.gov.uk/amenitygreenspace

Next steps

We aim to produce a first draft of the new Local Plan by January/February 2019 when it will be published for formal consultation. This consultation draft amongst others will include the suggested policy approach and proposals for the designation of open space areas collectively referred to as **Amenity Green Space & Local Green Space** in the Topic Paper.

This consultation will allow interested parties to comment at that time.



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We hope this update is of interest and once again we wish to thank Parish & Town Council's for their input and support in the production of this review. Should you have any questions please feel free to get in touch.

Yours sincerely,

Mark Ashwell DipTP MRTPI
 Planning Policy Manager
 01263 516325
mark.ashwell@north-norfolk.gov.uk

Figure 35 Local Green Space & Amenity Green Space Study Update to Parish & Town Councils (June 2018)

Topics discussed at 'Understanding Coastal Erosion' Briefing Event 30 November 2017

1. Overview of the Coast - how it has changed, how it is currently managed and what is likely to happen moving forward
2. Coastal Protection Consents/Notification Process - how it works
3. Coastal concordat and the overlap with the need for planning permission
4. Current policy framework - what is working, what needs reviewing, experiences from elsewhere

Table 37 Understanding Coastal Erosion

Developing the Evidence Base & Site Selection Consultation Evidence N

Norfolk and Suffolk Coastal Authorities

Statement of Common Ground

Coastal Zone Planning

This statement of common ground is between:

- Borough Council of King's Lynn & West Norfolk
- North Norfolk District Council
- Great Yarmouth Borough Council
- Suffolk Coastal District Council
- Waveney District Council
- The Broads Authority

The purpose of this statement is to set out an agreed approach to coastal planning in relation to:

- Demonstrating compliance with the "Duty to Cooperate";
- Agreeing shared aims for the management of the coast;
- Maintaining and develop a shared evidence base; and
- Recognising the importance of cross-boundary issues in relation to coastal management.

Background

The risk of coastal flooding and vulnerability to erosion along the coast does not respect local planning authority boundaries, and therefore coastal change needs to be considered across a wide geography. There are significant potential benefits to joint working across administrative and professional disciplines in addressing the issues of coastal planning.

A strategic approach to coastal land use and marine planning can benefit from the sharing of both issues and solutions, and inform planning practice. This is particularly the case in light of the similarity and commonality of coastal issues across the signatory planning authorities, the planning duty to cooperate, and the opportunity to build on the benefits of the existing joint Coastal Authority approach such as Coastal Partnership East.

The National Planning Policy Framework (NPPF) states that in coastal areas, local planning authorities should apply Integrated Coastal Zone Management (ICZM) across Local Authority and land/sea boundaries, ensuring integration of the terrestrial and marine planning regimes.

ICZM is a process which requires the adoption of a joined-up and participative approach towards the planning and management of the many different elements in coastal areas (land and marine). The recognised key principles which should guide all partners in implementing an integrated approach to the management of coastal areas are:

- A long term view
- A broad holistic approach
- Adaptive management
- Working with natural processes
- Supporting and involving all relevant administrative bodies
- Using a combination of instruments
- Participatory planning
- Reflecting local characteristics



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Within the development planning system, local planning authorities should reduce risk from coastal change by; avoiding inappropriate development in vulnerable areas or adding to the impact of physical changes to the coast, as set out in the NPPF. Any area likely to be affected by physical changes to the coast should be identified as a Coastal Change Management Area.

The Flood and Coastal Change Planning Practice Guidance also identifies that land can be formally allocated through local plans for the relocation of both development and habitat affected by coastal change.

Note: Physical change to the coast can be (but is not limited to) erosion, coastal land slip, permanent inundation or coastal accretion.

Shared Aims

- A **holistic and “whole coast” approach** will be taken, recognising **coastal change** is an inevitable part of a dynamic coast. A naturally functioning coastline is desirable in principle, but may not be appropriate in every location.
- The signatory Authorities will consider the value of **aligning policy approaches**.
- To have regard to the well-being of **communities** affected by coastal change and minimise blight.
- To **protect** the coastal environment, including nature conservation designations and biodiversity.
- To work with local businesses and the wider economy to maximise productive use of properties and facilities for as long as they can be safely and practicably utilised to promote **investment, viability and vitality** of the area.
- Adopt a balanced **risk-based approach** towards new development in Coastal Change Management Areas, in order to not increase risk, while at the same time to facilitating affected communities' adaption to coastal change.
- To promote **innovative approaches** such as techniques that enable anticipatory coastal adaptation, removal of affected structures and property roll-back or relocation.

Agreed Approach

The signatory authorities agree to work together on coastal planning issues to:

- a) Implement the principles of Integrated Coastal Zone Management;
- b) Develop shared **understanding** of coastal processes and the development planning implications of these;
- c) Share experience, **best practice** (including planning policies) and ideas for innovation;
- d) Use the adopted **Shoreline Management Plans** as a basis for development planning, recognising that defined areas may change in future and giving appropriate regard to emerging replacement Shoreline Management Plans, updated predictions of the impact of climate change or other relevant evidence;
- e) Acknowledge the importance of **coastal communities and their economies**, and foster their resilience, innovation and vitality;
- f) Recognise the need to **relocate or protect infrastructure** likely to be adversely affected by coastal change;
- g) Note the need for strategic policies on coastal change, in order to guide **neighbourhood planning**.
- h) Encourage development which is consistent with anticipated coastal change and its management, and facilitates **adaptation** by affected communities and industries.



Developing the Evidence Base & Site Selection Consultation Evidence N

- i) Consider adopting policies to facilitate **rollback and/or relocation**, potentially including local plan site allocations or facilitating 'enabling' development;
- j) Consider adopting policies which require the use of **risk assessments** to demonstrate that a development on the coast will be safe for its planned lifetime, without increasing risk to life or property, or requiring new or improved coastal defences; and
- k) Consider adopting policies that seek to ensure that new or replacement **coast protection schemes** are consistent with the relevant Shoreline Management Plan and minimise adverse impact on the environment or elsewhere on the coast.

This Statement of Common Ground has been endorsed by the following:

Cllr. Ian Devereux

Cabinet member for Environment

Borough Council of Kings Lynn and West Norfolk

Cllr. Richard Blunt

Cabinet member for Development

Borough Council of Kings Lynn and West Norfolk

Cllr. Hilary Cox

Cabinet member for Coastal Management

North Norfolk District Council

Cllr. Susan Arnold

Cabinet member for Planning

North Norfolk District Council

Cllr. Carl Smith

Chairman, Environment Committee

Great Yarmouth Borough Council

Cllr. Graham Plant

Leader and Chair, Policy & Resource Committee

Great Yarmouth Borough Council



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Cllr. Andy Smith
Cabinet member for Coastal Management
Suffolk Coastal District Council

Cllr. Tony Fryatt
Cabinet member for Planning
Suffolk Coastal District Council

Cllr. David Ritchie
Cabinet member for Planning and Coastal Management
Waveney District Council

Melanie Vigo di Gallidoro
Chairman, Planning Committee
Broads Authority

Haydn Thirtle
Chair, Broads Authority

Endorsed by the Environment Agency
Mark Johnson, Regional Coastal Manager



Figure 36 Coastal Zone Planning - Statement of Common Ground

Developing the Evidence Base & Site Selection Consultation Evidence N

O General Consultation Evidence

Appendix O: General Consultation Evidence

O.1 Green Build

'Meet the Planners' Event @ Green Build 2017

A Local Plan display was provided at the Green Build 2017 event at Felbrigg Hall over the weekend of 9 & 10 September 2017. The event was attended by over 6,000 visitors. This provided the opportunity for local people to talk with officers about the Local Plan and any elements within it that were of local concern. The 4th edition of the Local Plan newsletter was issued to consultees prior to the event which gave notice of our presence at Green Build.

The key issues raised were:

- Affordable homes - more needed particularly for young people.
- Custom and self-build homes - not just tagged on to major developments. There should be more flexibility as to the locations where self build can take place.
- House types - not enough small, affordable homes being built e.g. 1-2 bed houses.
- Locations for development - growth is wanted in smaller settlements. Policy of restricting growth only to large settlements is causing rural facilities to decline.
- Second homes - causing decline of local facilities and services due to lack of local spend.
- Sites - specific questions about sites which had been put forward for development through the Call for Sites process and published in the Housing & Economic Land Availability Assessment (HELAA)
- Lack of public transport options.



Figure 37 Green Build Display 2017

General Consultation Evidence O

'Meet the Planners' Event @ Green Build 2018

A Local Plan display was once again provided at the Green Build 2018 event at Felbrigg Hall which took place over the weekend of the 8th & 9th of September. The event was attended by over 6,000 visitors.

Display boards covered an introduction to the Local Plan (including the quantity of development planned and the emerging options), the location for future development, how to get involved, green policies and Neighbourhood Planning. Planning Policy Officers were available to discuss the Local Plan with interested parties.



Figure 38 Green Build Display 2018

O General Consultation Evidence

O.2 Additional Update Correspondence

Site Promoter Letter 1

21 July 2017



Sent to all Agents, Developers & Landowners
on the Local Plan Consultation Database as of 21/07/17

Dear,

Publication of new Housing Land Assessment / Selection of sites for development

The Council has recently published a **Housing & Economic Land Availability Assessment (HELAA)** which can be found at www.north-norfolk.gov.uk/helaa

Part 1 of this assessment provides details of potential housing development sites in North Norfolk which are drawn from a number of sources, including the sites suggested to us via the 'Call for Sites' process which we undertook last year.

The HELAA concludes that there is sufficient residential development land across the district to accommodate the identified housing need across the Plan period 2016-36.

As this document is a capacity study it **does not make any decisions** about which sites will be released for development via allocation in our new Local Plan. It does however include an initial site appraisal process which gives a broad indication in relation to our current assessment of site suitability.

In the next few months we will commence the detailed assessment of the options that are available and reach decisions about which sites should be identified as preferred development sites for consultation in a Draft Plan. To complete this work we will rely on the information which is available including any details which you may already have submitted via the Call for Sites process.

The information included in the HELAA may indicate areas of concern but which might be capable of being addressed **if supporting evidence can be provided**. For example, in preparing the Assessment we have consulted with the Highway Authority who may have raised concerns about the suitability of the local highway network or site access. These concerns may be capable of being addressed if highway improvements are made as part of a proposal, or access details confirmed. If land is dependent on third party access then we would encourage land owners and promoters to confirm that there is an agreement in place to allow development to commence (if allocated).

If you wish us to take any further information into account it is important that this is provided by no later than Friday 29th September, and sent to:

Continued....

General Consultation Evidence O

planningpolicy@north-norfolk.gov.uk

Planning Policy Team, NNDC, Holt Road, Cromer, NR27 9EN

The HELAA identifies sites which could collectively deliver many thousands of dwellings and consequently only a small proportion will need to be allocated for development in the new plan. Although the locations where new housing growth will be focussed will not be agreed for some time, at this stage it is considered highly likely that the majority of future development sites will be identified close to one of the Districts seven towns and a small number of the larger villages which offer a range of services to meet daily needs.

If you have not already done so you may wish to contact us to discuss the prospects of a site being identified for allocation with the Planning Policy Team before undertaking and supplying any further work to aid the detailed stage of the site selection process.

We are writing to you because you are included on the North Norfolk Local Plan Consultation Database as a Planning Agent, Developer or Landowner. If you no longer wish to receive communications from us please send your request to the above email address.

Yours sincerely,

Mark Ashwell DipTP MRTPI
Planning Policy Manager
01263 516325
mark.ashwell@north-norfolk.gov.uk
www.north-norfolk.gov.uk/localplan

Figure 39 Site Promoter Letter 1 - HELAA and site selection process update

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Site Promoter Letter 2

3 November 2017



Sent to all Agents, Developers & Landowners
on the Local Plan Consultation Database as of 03/11/17

Dear Sir / Madam,

North Norfolk Local Plan: selection of sites for future development

We wrote to you on 20th July (all Agents, Developers and Landowners listed on our database) advising of an opportunity to submit additional information in support of sites proposed for allocation in the emerging Local Plan. For those that submitted additional information, thank you, we have noted your response(s) and will ensure that this information is considered carefully as we progress.

Over the coming months a number of Council decisions will be made as to the overall strategy for development. This includes the proposed settlement hierarchy (which specifies the locations where future residential development and the majority of new commercial development will be permitted) and the overall housing target. In parallel to this we will be carrying out more detailed site assessment and sustainability appraisal of those sites **which align with the emerging strategy**. As and when there is a need for further dialogue we will contact you directly.

At this stage it is considered highly unlikely that the Council will seek to formally allocate small sites (less than 10 dwellings) for development or identify development sites in locations which do not have access to suitable services. This does not preclude the possibility of smaller scale developments being allowed via the inclusion of supportive policies in the Local Plan. The Council's preferred approach to smaller scale developments will be outlined in the draft Plan.

As this work advances we will be seeking member agreement on sites with the Planning Policy & Built Heritage Working Party, and Cabinet, leading up to the preparation of a **First Draft Local Plan** for consultation, which we aim to publish in Spring 2018. As the choice of sites is directly linked to the emerging strategy for development in North Norfolk I recommend that you check this page occasionally for updates: <https://www.north-norfolk.gov.uk/ppworkingparty>

The next opportunity to submit potential alternative sites, and to comment on the Council's proposed strategy for development, will be during the anticipated formal consultation period next year. We will write to notify you when consultation dates have been set and also to provide information on how to submit comments.

Continued....

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It is our intention that all those promoting sites through the Local Plan are included on the Local Plan Consultation Database, which ensures you are notified of the key stages of Plan preparation, typically via our newsletter. We have assumed that your permission is given unless you notify us otherwise.

We have written to you because you are included on the North Norfolk Local Plan Consultation Database as a **Planning Agent, Developer** or **Landowner**. If you no longer wish to receive communications from us please send your request to the email address provided.

Should you have any questions do not hesitate to contact us at planningpolicy@north-norfolk.gov.uk

Yours sincerely,

Chris Brown
Project Support Officer (Planning Policy)
01263 516318
planningpolicy@north-norfolk.gov.uk
www.north-norfolk.gov.uk/localplan

Figure 40 Site Promoter Letter 2 - Update on site selection process

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Local Plan Update Events (Parish & Town Councils)

Date	Attendance	Discussed
30 October and 1 November 2018	Approximately 90 representatives from 60 parish and town councils attended over the two sessions.	<p>Key issues covered included:</p> <ul style="list-style-type: none"> ● The setting of the housing target and the need to focus on providing for an aging population. ● Distribution of Growth. ● Development Sites. ● Dwelling Affordability. ● Key policy areas including: housing construction standards, better quality homes, the potential for more permissive flexible approach to development. ● Evidence. ● Public Consultation Arrangements. <p>Key discussion items included:</p> <ul style="list-style-type: none"> ● The affordability of homes, the proportion that will be provided as affordable and the role of affordability in determining any requirement for retirement properties. ● Optional technical standards in relation to size, access and adaptability. ● The component parts of the housing target and the underlying trends of household projections ● Concerns over second, third, fourth etc. homes and possible controls. ● Concerns around employment: Where the opportunities are in the District and how a younger workforce can be retained. ● Issues raised regarding infrastructure: doctors, schools, road network etc. and the role of the LPA in relation to investment in services. ● The potential for policy approaches in relation to dwelling efficiency and carbon reduction and Increasing residential housing performance.

Table 38 Local Plan Updates

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Figure 41 Local Plan Update 30 Oct 2018

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Dear All,

Parish & Town Council Local Plan Update Events

We would like to offer our thanks to those who were able to attend one of the Local Plan update events at Cromer last week. Representatives of approximately half of the 122 Parish & Town Council's in the district were in attendance over the two evenings.

A [copy of the presentation](#) is available to download, along with a document containing [the settlement maps](#) which were on display at the events.

The sites shown on the maps should be regarded at this stage as very much **draft proposals** and it remains possible that over the next few months things may change. It is important to note that we are **not** publishing these plans for consultation until early next year when there will be a formal six week public consultation period. In the meantime if these maps are shared please could I ask that you emphasise that any comments should be made during the formal consultation period and not now.

We will notify you of the consultation arrangements early in the New Year. Meanwhile you may wish to refer to the [Planning Policy & Built Heritage Working Party Reports](#) to keep informed of work content and progress.

Once again many thanks to those who were able to attend these events and we hope you found them to be informative.

If you were unable to attend and have any questions about the Local Plan process, or wish to submit any feedback following the events, we would be pleased to receive any comments to planningpolicy@north-norfolk.gov.uk

Kind Regards

Mark Ashwell
Planning Policy Manager

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Attendance at Parish & Town Council Meetings

Date	Parish	Discussed
5 September 2017	Blakeney Parish Council	Potential to prepare a Neighbourhood Plan, process of designation, affordable housing delivery mechanisms.
18 October 2017	Southrepps Parish Council	Status of village as Service Village and potential of further allocations
22 February 2018	North Walsham Town Council	Possibility of large scale growth and its impacts on the Town. Local Plan preparation process and relationship to Neighbourhood Planning.
16 April 2018	Field Dalling Parish Council	Rural exceptions policies and justification for 'large' affordable scheme in village.
23 April 2018	Briston Parish Council	General update on Local Plan preparation process and likely development sites in village.
22 May 2018	Hoveton Parish Council	Hoveton status in emerging plan, likely scale of growth and preferred site.
31 June 2018	Sculthorpe Parish Council	Village status, consequences of recent appeal decision, rural exceptions policy.
23 January 2018	North Walsham (Public Meeting)	Presentation and discussion in relation to emerging preferred option for large scale growth to west of town. Public meeting attended by approx. 100 residents. Extensive Q&A session and opportunity to fill in response form to North Walsham Town Council.
7 January 2019	Roughton Parish Council	Local Plan update and current proposals for large scale development in Roughton Road. Relationship between current planning application and Local Plan preparation process.
22 January 2019	Swafeld Parish Council	Concerns about North Walsham extending towards Swafeld. Merits of local scheme to deliver affordable homes and village facilities. (Enabling development principles.)
5 February 2019	Northrepps Parish Council	Growth in Cromer actually located in Northrepps Parish. Update on themes and timetable for Local Plan preparation.
14 February 2019	Cromer Town Council	Potential growth in Cromer, issues to be addressed, merits of Section 106 v CIL, programme for Local Plan consultation.
20 March 2019	Colby & Banningham Parish Council	General update on Local Plan content and consultation arrangements.
15 April 2019	Little Snoring Parish Council	General update on Local Plan content and consultation arrangements.

Table 39 Record of Officer Attendance at Parish & Town Council Meetings

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Residents and Businesses Consultation Notification Letter



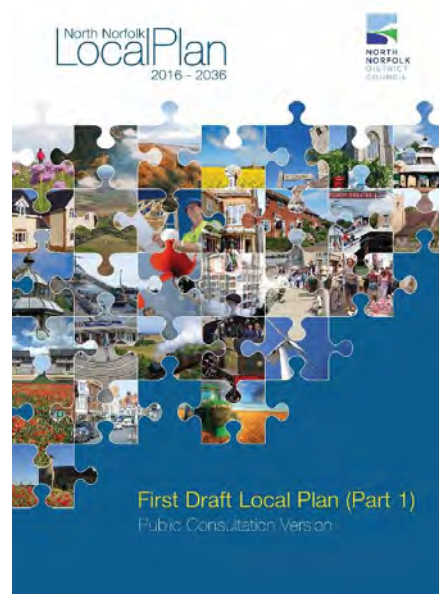
Notice of Draft Local Plan Consultation

The Council is producing a new Local Plan which will guide development in North Norfolk up to 2036. This note explains how you can get involved in the preparation of the Plan.

The purpose of the Local Plan is to ensure there is clear detail on where development should be provided, how it should be provided (through suitable development policies), and to identify appropriate development sites to meet needs. It ensures that good quality, sustainable development takes place which respects the environment and heritage of North Norfolk while improving the lives of residents.

We are inviting residents, businesses and organisations to consider the content of the **First Draft Local Plan** and to let us know if any changes are considered necessary. As part of this consultation we will also publish details of the **Alternative Options** that have been considered, along with the supporting evidence we have taken account of when preparing the draft document.

A six week consultation period will take place from **Tuesday 7 May to Wednesday 19 June**.



What is the 'Development Plan?'

The existing Development Plan¹ is nearing the end of its lifetime and needs to be replaced.

When adopted, the new Local Plan, along with any approved Neighbourhood Plans, the Broads Local Plan and Norfolk County Council Minerals and Waste Local Plan will form the Development Plan for the District. Along with National Planning Policy & Guidance, the content of the Development Plan is the principal planning documentation that the Council uses to determine planning applications.

Continued...

¹ <https://www.north-norfolk.gov.uk/tasks/planning-policy/local-plan-current>

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What does the Local Plan do?

The Plan identifies the key land use **issues** facing the district such as climate change, the need for more homes including affordable homes, and strengthening the local economy. It includes a **vision** for North Norfolk in 2036, and the **aims & objectives** which the Council expects to achieve during the Plan period. The Plan includes new **policies** which are proposed to be used to determine future planning applications, and also proposes a number of **development sites** around the district which are intended to help to meet the housing, employment and other needs of the area.

The Plan covers a broad range of topics such as housing construction standards, design, affordable housing, development in the countryside, coastal erosion, green spaces and access, renewable energy, infrastructure, retail, tourism and more.

How can I get involved?

From Tuesday 7 May visit <http://consult.north-norfolk.gov.uk/portal> to submit comments.

The Local Plan is the key planning document for North Norfolk. This is your chance to influence its content.

Will my opinion matter?

Yes! The local knowledge of residents and expertise of local organisations can help to make the Plan better. Whether you object to or support an element of the plan, or wish to make some general comments, we are keen to have your feedback.

Additional Information

- We have also updated the North Norfolk **Design Guide** and produced new **Landscape Character & Sensitivity Assessments** which the Council intends to adopt as Supplementary Planning Documents (SPDs). These guidance documents are also available for comment during the consultation.
- Please note that comments made outside of the advertised consultation period will not be accepted.
- We will be holding a number of drop-in events in the first few weeks of the consultation period where you can discuss the proposals with planning staff. Further information will be available prior to the consultation at www.north-norfolk.gov.uk/localplan
- To sign up for future updates on the Local Plan and other Planning Policy matters you can subscribe at: www.north-norfolk.gov.uk/localplanupdates

We look forward to hearing from you.

North Norfolk District Council
Holt Road, Cromer
Norfolk, NR27 9EN

Tel: 01263 513 811
Social: @northnorfolkdc
Web: north-norfolk.gov.uk



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Parish and Town Council's Notice of Consultation Letter



Sent to all Parish & Town Councils by letter/email

Dear Clerk,

It has been agreed to commence the initial consultation on the **First Draft Local Plan** as soon as possible following the District & Parish elections in May.

The consultation will run from **Tuesday 7 May - Wednesday 19 June**. A number of promotional tasks will be undertaken to help bring this to the attention of local people and we will be seeking your assistance with this nearer the time, for example in displaying posters in your community and raising awareness through parish meetings.

Those who have questions about the Local Plan proposed policies and sites will be able to come and discuss these with planning officers at a number of drop-in events during the consultation period. The events will be open between **2:30-7:30pm** at the following locations:

Location	Address	Date (May)
Sheringham	Room 5 & 6, Community Centre, Holway Road, NR26 8NP	7
Cromer	Parish Hall, Church Street, NR27 9HH	8
Briston & Melton Constable	Briston Pavilion, Recreation Ground, Stone Beck Lane, NR24 2PS	9
Holt	The Lounge, Community Centre, Kerridge Way, NR25 6DN	15
North Walsham	Community Centre, New Road, NR28 9DE	16
Mundesley	Coronation Hall, Cromer Road, NR11 8BE	17
Ludham	Village Hall, Norwich Rd, NR29 5PB	20
Stalham	Town Hall, High Street, NR12 9AS	21
Hoveton	Broadland Youth & Community Centre, Stalham Road, NR12 8DJ	23
Fakenham	Community Centre, Oak Street, NR21 9DY	24
Blakeney	Village Hall, Langham Road, NR25 7PG	29
Wells-next-the-Sea	The Maltings, Staithe Street, NR23 1AU	31

The above programme represents a substantial use of resource for the team at a busy time and we have therefore focussed on delivering events in the main growth areas and most populous parts of the district. It may be possible to attend a parish meeting if you feel this would be helpful to discuss

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specific land-use issues which relate to the Local Plan. Please send your request to planningpolicy@north-norfolk.gov.uk.

A letter regarding the Local Plan (attached for info) is being distributed in the next week to all residences and commercial properties in North Norfolk via the annual Council Tax and Business Rates billing mailout. This will assist in raising the profile of the Local Plan whilst informing residents of the upcoming consultation and providing details as to how they can get involved.

If you have any questions about the Local Plan please do get in touch.

Kind Regards

Chris Brown

Project Support Officer (Planning Policy)

01263 516318 | chris.brown@north-norfolk.gov.uk

Figure 44 Parish & Town Council's Notice of Consultation & Drop-in Events Letter

