

Response of the Qualifying Body – Wells-next-the-Sea Neighbourhood Plan Working Party on behalf of Wells Town Council to the Wells-next-the-Sea Neighbourhood Development Plan Examiner’s Clarification Note

(QB response shown in italics)

This Note sets out my initial comments on the submitted Plan. It also sets out areas where it would be helpful to have some further clarification. For the avoidance of any doubt, matters of clarification are entirely normal at this early stage of the examination process.

Initial Comments

The Plan provides a very clear and concise vision for the neighbourhood area.

The presentation of the Plan is very good. The difference between the policies and the supporting text is clear. It includes various high-quality maps and photographs.

The Plan addresses a series of issues and policies which are very distinctive to the neighbourhood area. It is commendably supported by a series of detailed Assessments and Appendices which inform the relevant policies.

Points for Clarification

I have read the submitted documents and the representations made to the Plan. I have also visited the neighbourhood area. I am now able to raise issues for clarification with the Town Council.

The comments made on the points in this Note will be used to assist in the preparation of the examination report and in recommending any modifications that may be necessary to the Plan to ensure that it meets the basic conditions.

The representation from North Norfolk District Council (NNDC) is very detailed. Rather than repeating its contents on a policy-by-policy basis, I have invited the Town Council to respond to the representation as it sees fit later in this Note. However, where necessary, I draw particular attention to a NNDC comment where it overlaps with my general questions.

I set out specific policy clarification points below in the order in which they appear in the submitted Plan:

Policy WNS0

Am I correct in my reading of paragraph 4.11 that the policy has been included in the Plan to address the mitigation issues which were identified in the HRA work? If this is the case, could the relevant mitigation measures be addressed in the relevant policies?

To what extent does the policy restate national and/or local planning policies?

QB Response:

The policy is a direct result of the HRA recommendations. We considered whether we should add the appropriate wording to the relevant policies in the Plan but were concerned that repeating them with each policy would seem to be unnecessary duplication and would give rise to repetitive and slightly dull policy wording flow. We thought we would try to be innovative and concluded that by creating a distinct policy to address the issue and place it at the beginning of the Plan, the essence of the policy would be given a significance and a standing which makes it clear how important and fundamental to the plan this issue is and how environmentally sensitive the area is. . Whilst it is acknowledged that the policy may in places

restate the national/ local policy, the wording is taken from the recommendations of the HRA of which the Plan has a duty to take on board in order to be compliant with the additional basic condition. The restating of national/local policy would still be present if the wording were to be included in the relevant policies. Notwithstanding the above, if the Examiner is so minded to recommend that the Plan be amended to address the relevant mitigation measures in the relevant policies the QB would not object. We were trying to take an original approach.

Policy WNS1

Does the Town Council have any comments on NNDC's suggested revisions to the policy?

QB Response:

Policy WNS1:

- *criterion a) – No objections to the suggested wording amendments.*
- *criterion b) - No objections to the suggested wording amendment*
- *criterion c) – This criterion was devised to take into account NNDC response at R14 stage, the NNDC position seems to have shifted. The proposed references to 'community led-housing group' do not add clarity and is not supported. The QB spent considerable time in defining a key worker definition that was appropriate to Wells and is locally distinctive. Paragraph: 007 Reference ID: 70-007-20210524 of the NPPG indicated that the definition of a key worker can be determined locally. The concern of the QB, from local experience, is that the NNDC allocations policy does not work. Local people in work are never likely to get a house because they are trumped by those assessed as having greater need. NNDC contend that it is not a planning matter. The QB is faced with the fact that there is a strong feeling in the town that no houses should be built other than for local people. The form of a cascade policy is important. The three months to find a tenant after which the district's policy would operate is not considered to be long enough. The local definition of key worker should be retained.*
- *Girams – no objection to the suggested wording*
- *Appendix B: DO not agree to deletion of Appendix B for reasons stated at c) above.*

Policy WNS2

The policy takes a positive approach to the delivery of housing for local people. Nevertheless, is there a need for the use of 'community-led housing development' in the first two paragraphs of the policy given the contents of the criteria?

QB response:

Agree that the term Community Led-housing development may be extraneous in this instance given the criteria and would therefore not object to the first two paragraphs being re-phrased.

Does the Town Council have any comments on The Holkham Estate's suggested revisions to the policy?

QB response:

No objections to the use of 'approximately'. Would not support apartments on the site as this is likely to conflict with landscape considerations at this edge of settlement site. No objection

to the use of 'predominantly'. Whilst on site biodiversity net gain is preferred it is acknowledged that this may not be possible with the other considerations.

Is there any specific reason why Figure 27 shows other land use/policy proposals in addition to the location of the proposed allocation? Is there any direct or indirect relationship between the different uses?

QB response:

During the early stages of the Neighbourhood Plan preparation there was an informal proposal from Med-Centres to use the whole triangle site for development. This resulted in considerable opposition to the scheme locally and concerns that the allotments and the current horse paddocks would be lost. This was also a key concern during the policy ideas consultation and has been consistently raised since. The map is therefore an attempt to provide some reassurance to local people that the allocated site can work with the other uses intact as the locally held perception was that the allocation would preclude these from continuing.

Policy WNS3

The policy takes an interesting approach to housing mix. Nevertheless, is the Town Council satisfied that the policy will not detract from the commercial viability of residential proposals?

The reference to ten or more dwellings in the second paragraph of the policy is confusing. Is the policy intended to apply to all housing development or only to those with ten or more homes? On a related point, how would the mathematics of the policy apply to smaller developments (those which would deliver less than ten homes)?

Does the Town Council wish to comment on NNDC's representation about the appropriateness of the delivery and/or affordability of First Homes in the neighbourhood area?

QB response:

This policy is intended to apply to proposals for open market housing of more than 10 dwellings. It is recognised that proposals for less than 10 dwellings are unlikely to deliver affordable housing. Given the high level of house prices in Wells (which are referred to in paragraph 5.11 in the Neighbourhood Plan) and the demand for new housing in the town, the QB is satisfied that the policy would not detract from viability.

The QB notes the NNDC position on First Homes. The reference in the NPPG that 'new development plans, including local plans and neighbourhood plans, should take account of the new First Homes requirements from 28 June 2021' has been the driver for its inclusion in this policy as the QB did not want to fall foul of such a specific measure. It is noted that Neighbourhood Plans are able to specify a different discount for First Homes other than the 30%, where this can be justified. However, in this case the Housing Needs work undertaken to support the plan did not cover this issue. The QB would not object to the removal of the First Homes requirement if the Examiner is minded to agree with the NNDC position.

Policy WNS4

In general terms, I am satisfied that the Plan includes an appropriate range of evidence to support a Principal Residence policy.

Nonetheless the representations from NNDC, the Holkham Estate and several residents question the effectiveness of such a policy. It would be helpful if the Town Council responded to those comments.

The wording of the policy largely replicates those of similar policies which has been included in other made neighbourhood plans. NNDC has suggested refinements to the policy. I am minded to recommend them as modifications. Does the Town Council have any comments on this proposition?

QB response:

It is acknowledged that the implementation of any principal residence policy is to a degree dependent upon the enforcement practices of the District Council and the vigilance of the local community. To be effective it needs to be well known that there is a restriction applicable to such dwellings and this needs to be made sure to first and future occupiers. NNDC's suggested amendments go some way towards that. The imposition of a condition on any planning permission would be required. Subsequently, non-compliance would be a breach of condition. An example from the North York Moors National Park Authority of such a condition and the requirements to fulfil it are shown below:

"The dwellings hereby permitted, shall be used as a principal residential dwelling and for no other purpose including any other use in Class C3 of the Schedule to the Town and Country Planning (Use Classes) Order 2020 (or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification). The property shall be the only or principal home of the main occupant and it shall be occupied by the main occupant for at least 80% of the calendar year in the event that the main occupant occupies more than one property. The property shall not be occupied by the main occupant as a second home. The occupants shall supply to the local planning authority (within 14 days of the local planning authority's request to do so) such information as the local planning authority may reasonably require in order to determine compliance with this condition. For the avoidance of doubt the property shall not be used as a single unit of holiday letting accommodation."

No objection in principle to the NNDC suggested amendments to para 5.71 or Policy WNS4. However there is a slight concern that the criteria of 'majority of time' and also 'working away from home' may loosen the Policy's impact. Furthermore the NNDC suggestion 'if' in relation to NNDC requesting information from occupiers should not be used as it indicates that NNDC may not enforce the policy which weakens it still further. It is considered that the existing text in para 5 provides clarity on how proof of residency can be provided and the QB preference would be for it to be retained.

The text relating to the strategic allocations at 5.77 was provided by the Holkham Estate who were in discussions with NNDC in respect of specific applications on each site. The QB position is predicated on these delicate negotiations. One of those applications (land at Ashburton Close) has been submitted and is awaiting determination, the other has been the subject of pre-application discussion with NNDC and has been presented to the QB informally. If paragraph 5.77 is to be removed as suggested by NNDC then the note in the policy should also be removed.

Policy WNS5

As submitted this policy takes a very general approach towards infill development. Could the policy be combined with Policy WNS6 to ensure that it is locally-distinctive and to avoid having two policies with overlapping effects?

QB response:

No objection to the two policies being combined for the reasons stated.

Policy WNS6

The Design Guidance and Codes is an excellent document. In combination, the policy and the Design Guidance and Codes are a first-class local response to Section 12 of the NPPF.

It would be helpful if the Town Council commented on NNDC's representation about the appropriateness of including detailed criteria in the policy when the matters concerned are captured in the Design Guidance and Codes? Without prejudice to its response on this matter, does the Town Council have any specific comments on NNDC's suggested revisions to the policy?

QB Response:

The NNDC point about detail is noted. There is a concern that if matters of important design detail are left to supplementary and/or supporting documents that they may not be given due weight and consideration by Case Officers when determining applications or by developers when designing their schemes. The purpose of the policy is to ensure that key design elements are covered in a single policy, that is easy to find that sits within the Neighbourhood Plan and carries development plan weight. The concern is that if this key guidance sits within an additional document that it requires an additional document to be opened/retrieved it may not always be uppermost in the Development Management officer's considerations when applications are determined.

NNDC suggested revisions:

Do not agree with the proposed amendment to amend opening paragraph and delete the rest of the policy for the reasons outlined above.

Parking: No objection to suggested change to refer to permeable paving

Criterion g) – No objection to suggested amendment

Criterion i) – object to the use of 'in keeping with' in this context. The NPPF places great emphasis on the need to raise the standard of design and create beautiful places. The use of 'in keeping' could result in an unsatisfactory development if the existing surrounding development is not of a good quality. The use of the word 'enhance' is more compatible with the aims of the NPPF.

Criterion j) – No objections to suggested amendments.

Criterion k) – Consider that this criterion is best kept with the other design elements

Policy WNS7

I looked at the two proposed redevelopment sites identified in the policy carefully during the visit.

As submitted, the policy is simply a statement rather than a land use policy. Is the intention of the policy that the redevelopment of the two sites would be supported?

The first paragraph of the policy assumes that redevelopment proposals will improve the visual appearance and character of the area. Given the appearance of the two sites I am confident that this outcome will be achieved. Nevertheless, should there be a direct reference in the policy to the need for high quality designs to be achieved (and a cross-reference to Policy WNS6)?

QB response:

Yes – the intention is to support the redevelopment of both sites

Yes – a cross reference would be supported

Policy WNS8

I understand the comments about independent traders in the second part of the policy. However, could such a distinction be applied through the planning process?

I also understand the comments about the night-time economy in the third part of the policy. However how could the two matters be connected through the planning process?

Is it appropriate to suggest that access to residential accommodation above ground floor commercial uses should be from the rear? Would such an approach be safe/sustainable? Is the retention or development of an independent access which does not detract from the commercial vibrancy of the main street the key issue?

Should the penultimate paragraph offer support to proposals rather than apply the sequential test (as the policy only applies in the town centre)?

QB Response:

On reflection, it is acknowledged that a distinction in respect of independent traders would not be possible to apply through the planning process.

The nature of Staithe Street is a location where front access is unlikely. The presence of people living on Staithe Street is unlikely to support the night-time economy (and of course noise from venues could be a problem). The retention or development of an independent access which does not detract from the commercial vibrancy of the main street is the key issue. No objection if the Examiner were to reconfigure or amend this policy .

On reflection, it would seem sensible to offer support to proposals given that the policy applies only to the town centre.

Policy WNS9

As I read the second paragraph it largely repeats the first. Please can the Town Council explain its thinking on this matter?

Is the final paragraph supporting text rather than a land use policy?

QB Response:

Agree that paragraph 2 only adds the issue of electric charging points to the first paragraph.

Agree that the final paragraph could be supporting text.

Policy WNS10

The first part of the policy reads well and would be capable of being applied through the planning process.

The second part is very vague. Please can the Town Council explain its thinking on this matter and how it would expect NNDC to be able to apply the policy in a clear and consistent fashion.

QB Response:

Agree that paragraph 2 as worded would be difficult to implement. This paragraph is so worded because there is currently no firm proposal or project in the pipeline which would achieve this aim although this may change by the time of a plan review. No objection if the Examiner were to reword for clarity and agree with NNDC comments that map would aid clarity. I

Policy WNS11

Does the Town Council have any specific comments on NNDC's suggested revisions to the policy?

QB Response:

Agree to make map larger for legibility and to review for accuracy. The QB would prefer to retain criterion e as currently worded and to retain the wording under Signage and Shopfronts which refers to the need to enhance the character and appearance. No objection to the other suggested amendments from NNDC to this policy. .

Policy WNS12

Appendix C provides an appropriate level of detail for the assets.

Please can Town Council and NNDC work together to produce appropriate location maps for the buildings concerned.

QB Response:

Individual maps for the proposed NDHA (similar to the approach taken to LGS) can be produced the QB has the ability to do this.

Policy WNS13

I am satisfied that Appendix C provides an appropriate level of detail for the proposed Local Green Spaces (LGSs).

Does the Town Council have any comments on NNDC's representation about existing or proposed other designations for the areas proposed to be designated as LGSs?

QB Response:

The proposed LGS have been assessed against the LGS criteria and the QB believe they fulfil the criteria for designation as set out in the NPPF. NPPG paragraph 011 Reference ID: 37-011-20140306 considers the position if the land is already protected by designations such as National Park, Area of Outstanding Natural Beauty, Site of Special Scientific Interest, Scheduled Monument or conservation area. In these cases, the additional benefit of LGS designation needs to be considered. These designations however are all nationally recognised designations with a clear purpose, intention and effect. It is perfectly reasonable for an LGS to be located within a wider area of AONB or Conservation Area as those designations perform a different function to the LGS and the area of LGS may be very distinctive within that wider setting. Furthermore, It is unclear what the local designation of 'open land area' is and how it differs from other designations and what additional purpose it has. Therefore because the LGS is a nationally recognised designation with a clear criteria and clear implications, the QB considered this the most appropriate way to protect the demonstrable value of these spaces.

Proposed LGS g may impact on the delivery of the proposed housing allocation (WO7/1) in the emerging Local Plan. This matter is acknowledged in Appendix D. Please can Town Council explain its position on this matter and how it has regard to paragraph 105 of the NPPF?

QB Response:

This issue has moved on slightly and the Holkham Estate have been in discussions with the QB on this issue about the potential location of the access (ahead of a potential planning application for this site). The latest position as at 4th December 2023 is that the Estate presented a revised scheme to the QB. This confirmed that the meadow can be preserved in part by moving the access road to the east which does not therefore conflict with the LGS designation.

How and when were the owners of the various proposed LGSs consulted?

QB Response:

Owners of LGS were notified by letter just prior to and as part of the Pre-Submission Regulation 14 consultation. (owners include the Town Council, County Council, Holkham Estate and Mr Wright, the Diocese, Hopkins Homes and a management company)

Policy WNS14

Both the Holkham Estate and NNDC comment that the approach taken is unjustified. Paragraph 8.28 refers to the character appraisal work undertaken by the Steering Group in 2021. Is this evidence available?

Proposed View 8 extends outside the neighbourhood area. I acknowledge that views do not respect administrative boundaries. However please can the Town Council explain its approach towards View 8?

QB Response:

The Character Appraisal Work is included within the Design Code at Section 2.6. However, it is acknowledged that the views identified in the submitted policy and those identified in the Character Appraisal work are not 100% complementary and that there is variation in the justification between views. It is acknowledged that View 8 looks largely towards the scrapes in the parish and the harbour and constitutes a panorama and that it extends outside of the Neighbourhood Area. This view could be amended to fall within the Neighbourhood Area and a new photograph could be provided).

Policy WNS15

NNDC suggests that the policy is recast. Does the Town Council have any comments on NNDC's revisions?

QB Response:

On reflection, no objection to the proposed amendments from NNDC however, it would be preferred if reference to the specific issues of emergency access corridors at East Quay (specifically East End and Quayside – east of the flood barrier to the Whelk Sheds) could be retained as this provides a localise dimension and also reflects the high level of local concern.

Policy WNS16

The policy does not appear to bring any town-based value to national or local planning policies. Please can the Town Council explain its approach to this matter?

QB Response:

On reflection, it is acknowledged that the policy as drafted does not provide a locally distinctive dimension.

Policy WNS17

I looked at the Wells Beach policy area carefully during the visit. I saw its separation from the town itself and its obvious importance to the popularity and well-being of the neighbourhood area.

NNDC suggests that the policy is recast. Does the Town Council have any comments on NNDC's suggested revisions to the policy?

QB Response:

No objection to NNDC proposed revisions to paragraph 1 of the Policy

On reflection, no objection to deletion of paragraph 2 of the Policy.

Objection to the deletion of paragraph 3 which it is believed is justified

No objection to NNDC proposed revisions to paragraph 4. Although it should be noted that criteria b and c were included to address previous comments made by NNDC.

Does the Town Council have any comments on the representation from Anglian Water?

QB Response:

Anglian Water have raised this previously. On reflection, no objection to the removal of the sewage works from the map delineating this policy.

Policy WNS18

The policy is commendably distinctive to the neighbourhood area.

I am minded to recommend that the third paragraph is repositioned into the supporting text as it describes a process matter rather than setting out a land use planning policy. Does the Town Council have any comments on this proposition?

QB Response:

No objections

Monitoring and Review

Section 11 addresses this important issue in a positive way. However, it does not comment on the potential implications of the adoption of the emerging North Norfolk Local Plan on a 'made' neighbourhood Plan.

I am minded to recommend the inclusion of additional commentary in Section 11 about the Town Council assessing the need (or otherwise) to review the Plan within six months of the adoption of the emerging North Norfolk Local Plan. Does the Town Council have any comments on this proposition?

QB Response:

The QB notes the position and that there is no formal review date for Neighbourhood Plans. It would be appreciated if the wording could reflect some discretion on the part of the QB and that it assesses the need for a review rather than be compelled to undertake a review. The current NP process has been in progress for close to 5 years and has been delivered by volunteers who have devoted a huge amount of time the project. Despite Locality funding, due to the timescales and the complexity of some of the issues, the QB has also used its own funding to progress the Plan. It would be appreciated if a time period of 9 months or 12 months could be included as it cannot be guaranteed that the existing Working Party Members will have the time, inclination or energy to undertake an immediate review and therefore new volunteers may need to be sought to make it happen.

Representations

Does the Town Council wish to comment on any of the representations made to the Plan?

It would be helpful if the Town Council responded to the representations from Anglian Water and the Holkham Estate.

NNDC raises a package of comments and proposes a series of revisions to certain policies in the Plan. It would be helpful if the Town Council commented on the suggested revisions (beyond the matters already raised in this note on a policy-by-policy basis).

QB Response:

See Appendix A

Protocol for responses

I would be grateful for responses to the questions raised by 12 February 2024. Please let me know if this timetable may be challenging to achieve. It is intended to maintain the momentum of the examination.

If certain responses are available before others, I would be happy to receive the information on a piecemeal basis. Irrespective of how the information is assembled, please could it come to me directly from the District Council. In addition, please can all responses make direct reference to the policy or the matter concerned.

Andrew Ashcroft

Independent Examiner , Wells-next-the-Sea Neighbourhood Development Plan

8 January 2024

Appendix A: Wells-next-the-Sea – Neighbourhood Plan Working Party - Comments on Reg 16 consultation responses

Respondent	Section	Suggested Working Party Response
Marine Management Organisation	General	Comments and general response noted. No objection to reference to the Marine Management Plan in the Section referring to the National and Local Planning context and in the supporting text to policies relating to Wells Beach or Wells Harbour.
Norfolk County Council (Designing out Crime)	Design	Comments noted. No change to Plan required.
Amanda Howe	General WNS5	Supportive comments noted. Comments noted re air bnb and holiday lets. However planning policies can only be enacted where planning permission is required. Currently renting a house out as a holiday let does not require planning permission, similarly Air b n b.
Jon Payne	Second Homes WNS5	Comments noted. The issue of council tax is not a matter for the Neighbourhood Plan. Setting quotas for ownership may also lie outside of the NP which can only influence new development – its policies cannot be retrospectively applied to the existing housing stock
Daniel Elliott	Affordable Housing WNS4	Comments noted. The issue of covenants lies outside of the Neighbourhood Plan process. This policy has been formulated as a response to consultation from local people.
NPS Norfolk Constabulary	WNS6 Safety	No objection to the inclusion of references to Secured by Design in Policy WNS6. The issue of police resources as a response to overall housing numbers is a matter for NNDC
Andrew Glaister	WNS5 Principal Residence	Comments noted although there appears to be a misunderstanding that the NP will charging a levy on second homes. This is incorrect, charging regimes including council tax are a matter for NNDC not the Neighbourhood Plan.
Natural England	General	No comments

Anglian Water	General WNS15 WNS17	Support noted. Floodrisk . No objection to the suggested wording if the Examiner is so minded to include. Wells Beach. See Examiner’s Note and relevant response. On reflection no objection to excluding this from the policy
Armstrong Rigg (obo Holkham Estate)	WNS0 WNS1 WNS2 WNS3 WNS4 WNS5 WNS6 WNS7/8 WNS9 WNS10/11 WNS12 WNS13 WNS14	Comments noted. See Examiner’s note and relevant response Support noted Comments noted. See Examiner’s note and relevant response Comments noted. Although the response from NNDC seems to indicate that a specific mix has not necessarily been agreed. Agree the reference should be to 5.77. The policy only excludes the two allocated sites provided that they deliver the mix outlined in para 5.77. NNDC seem to have concerns about this mix and request the paragraph is deleted. If the paragraph is deleted, then so should the last paragraph of the policy and the policy should then be applied to all new development. The policy has been devised as a response to public consultation but also to the evidence which relates to the imbalance in the housing market in the town. Holkham have not provided a clear planning reason to omit the policy other than it would affect their sites. Support noted Support noted. The NP once made will be used by the LPA to determine planning applications therefore the policy is able to include the detail referred to. Support noted Noted Noted The NDHA have been assessed using the appropriate HE criteria and sufficient level of detail . It is considered that each meets the relevant threshold for identification. It is understood that there has been agreement over the location of the access and that the identification of part of the site as LGS would be possible. (See Examiner’s note and relevant response) It is felt the policy is justified. See Examiner’s Clarification Note and relevant response

	WNS15/16 WNS17 WNS18	Noted NNDC have suggested some amendments to the policy that may address this point. Noted.
Norfolk County Council	WNS2 WNS6 WNS9 Gen Support WNS6 and 15 Highways	Noted No objection to inclusion of BNG reference if the Examiner is so minded. Agree a reference to the nearby CWS could be added to the policy or text Supporting comments noted No objection to inclusion of suggested wording if Examiner is so minded. A full review of flooding in the parish is not a requirement for the NP Support noted
NNDC	Gen WNS0 WNS1 WNS2 WNS3 5.71 5.77	No objection to inclusion of factual updates/numeric updates to supporting text as appropriate As a general point it is sometimes difficult to work out what the precise change being requested is as there are often multiple responses referring to the same policy. It would be useful if the complete policy wording change requested was shown just in one place. Comments noted . See Examiner's Clarification note and relevant response See Examiner's Clarification note and relevant response See Examiner's Clarification note and relevant response. Some concern over the suggestion of 3 months which may be quite a short time. It is unclear how this has been arrived at. See Examiner's Clarification note and relevant response in respect of First Homes. No objection to the references to Housing Vision HNA and HELAA. Object to the loss of criterion 3 relating to adaptability which is appropriate for a Neighbourhood Plan. Object to the removal of the % split which adds a local dimension. No objections to this wording. The QB does not require specific permission from NNDC for the wording in the NP whilst realising such wording needs to be justified. Para 5.77 was specifically inserted after discussions with the Holkham Estate who had in turn had pre-application discussions with NNDC on both sites. One application at Ashburton close has since been submitted and is awaiting determination. NNDC will

		need to take a view in determining such applications as whether the figures proposed are compliant with the emerging LP allocations. If paragraph 5.77 is to be removed from the NP, then the QB requests that the accompanying note in its entirety is also removed and the policy be applicable to all new development.
WNS5/5.81		See Examiner's Clarification note and relevant response.
5.89		.No objection to GIRAMS wording depending on the outcome of Examiner's consideration of WNS0.
WNS6		No objection to suggested wording re reference to the WNS Design Code
6.6		Typo noted. See Examiner's Clarification note and relevant response
WNS7		Factual update noted No objection to proposed wording if Examiner is so minded. No objection to GIRAMS wording depending on the outcome of Examiner's consideration of WNS0.
WNS8		No objection to suggested wording
7.3		No objection
WNS9		No objection to proposed wording
7.15		Para could be reworded for clarity rather than deleted.
WNS10		No objection to suggested wording and the inclusion of suitable maps
8.1-8.11		No objection to suggestion
Fig 9/10		Maps can be reviewed for legibility and accuracy
8.14		No objection to review
WNS11		No objection to suggested rewording
8.18-8.21		Suggest rewording in accordance with NPPF rather than deletion
WNS12		See Examiner's Clarification Note. Individual maps to be produced for each NDHA
WNS13		See Examiner's Clarification note and relevant response. Do not agree with NNDC response
WNS14		Do not agree with NNDC response. It is reasonable and justified to identify specific views within a wider protected landscape that require special consideration when development is proposed. The policy provides a more locally distinctive approach

	WNS15 9.6-7 WNS16 WNS17 WNS18	See Examiner's Clarification note and relevant response. No objections to proposed wording amendments although preference would be to retain reference to East Quay See Examiner's Clarification note and relevant response See Examiner's Clarification note and relevant response See Examiner's Clarification note and relevant response See Examiner's Clarification note and relevant response.
Tony Fullwood	WNS4 WNS6 Para 6.9 WNS9 WNS13 WNS14 WNS17	Support noted Whilst no objection to the tougher wording of 'compliance with', it is expected that this wording may not be supported by the Examiner No objection if the Examiner is so minded Whilst understanding the concerns, it is considered this is an appropriate response to the identified problem The East End allotments were considered but are already identified as 'open space' in the Local Plan. Noted. No objection to renaming if Examiner is so minded. Comments noted. However other consultees have suggested contrary amendments.