

GREAT YARMOUTH LOCAL PLAN PART 2

CONSULTATION STATEMENT



**GREAT
YARMOUTH**
BOROUGH COUNCIL

February 2020
Informing Final Draft Plan | Regulation 19
Representation Period
XX to XX 2020

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Introduction

This document provides a summary of the consultation undertaken on the Great Yarmouth Local Plan Part 2 under Regulation 18 of the Town and County Planning (Local Planning) Regulations 2012 (as amended). It provides the information required under Regulation 17 and 19 of the above mentioned regulations. The document sets out:

- Which bodies and persons the local planning authority invited to make representations under regulation 18,
- How those bodies and persons were invited to make representations under regulation 18,
- A summary of the main issues raised by the representations made pursuant to regulation 18,
- How any representations made pursuant to regulation 18 have been taken into account;

The process of producing the Local Plan Part 2 began following the adoption of the Core Strategy (Local Plan Part 1) for the Borough in December 2015. A call for sites consultation was undertaken in August – September 2016 under regulation 18.

A further regulation 18 consultation was undertaken in August 2018 on the Draft Local Plan Part 2. This invited comments from the identified statutory and general consultees, as well as any interested parties or individuals on the Council's Local Plan consultation database. The consultation was also advertised in the local press and invited comments from any interested members of the general public.

In consideration of the feedback received from the 2018 Draft Plan consultation, and changes to National Planning Policy, it was deemed necessary to undertake a further consultation on additional draft allocations and other significantly amended policies. This consultation began at the end of August and finished at the beginning of October 2019.

The collective feedback received through both 2018 and 2019 Draft Plan consultations was then taken into account to produce the Regulation 19 version of the plan. This will be consulted upon in February 2019.

The table below shows the key stages and dates of producing the Local Plan Part 2 and future milestone dates to adoption:

Key Stage	Target Date
Call for sites and suggestions Consultation (Reg 18)	Aug – Sep 2016
Draft Plan Consultation (Reg 18)	Aug – Sept 2018
Focused Changes Consultation (Reg.18)	Aug – October 2019
Publication of Final Draft Plan for Representations (Reg 19)	Feb 2020 – April 2020
Submission of Final Draft Plan for Examination	May 2020
Examination	May 2020 – Dec 2020
Adoption	Early 2021

Full copies of all responses can be seen here: <https://great-yarmouth-consult.objective.co.uk/portal>

Who We Consulted

When consulting on the Local Plan at the regulation 18 stage the following consultation bodies were invited, as well as other interested individuals and businesses on the Council's consultation database. Through press releases and adverts, other members of the public and businesses were also invited to comment. The table below lists those specific and general consultation bodies who were invited to comment, as per regulation 2 of the Town and Country Planning (Local Planning) Regulations 2012 (as amended).

Specific consultation bodies
Anglian Water Broadland District Council Broads Authority East Suffolk Council (formerly Waveney District Council) Electronic communication companies who own or control apparatus in the Borough Environment Agency Essex and Suffolk Water Gas and electricity companies Great Yarmouth & Waveney NHS Clinical Commissioning Group Highways England Historic England Homes and Communities Agency Marine Management Organisation Natural England Network Rail NHS England Norfolk Constabulary Norfolk County Council North Norfolk District Council Parish Councils within and adjoining the Borough South Norfolk Council
General consultation bodies
Voluntary bodies some or all of whose activities benefit any part of the area Bodies which represent the interest of different racial, ethnic or national groups in the area Bodies which represent the interest of different religious groups in the area Bodies which represent the interests of disabled persons in the area Bodies which represent the interests of persons carrying on business in the area Examples include: British Pipeline Organisation Broads Internal Drainage Board – Water Management Alliance Ministry for Housing, Communities and Local Government (MHCLG) Great Yarmouth Civic Society Great Yarmouth Port Authority Health and Safety Executive Home Builders Federation Norfolk Coast Partnership Norfolk Wildlife Trust Office of Rail Regulation RSPB

Sport England
The Theatres Trust

How They Were Consulted

The statement of community involvement (SCI) sets out how the Council will consult on its Local Plans and on planning applications. The SCI was first adopted by the Council in January 2006. The document sets out in detail the methods and techniques used to engage the community and encourage them to participate in the processes and to ensure that the processes are transparent and information is accessible. The early preparation stages (2005 - 2009) of the Core Strategy were produced in line with the 2006 SCI. The SCI has been updated twice since 2006. It was first updated in March 2013 and the second update was adopted in March 2019.

The below table sets out some of the consultation methods within the SCI and how they were undertaken through the main local plan consultation stages. Whilst there have been revisions to the SCI, the main methods of consultation have remained largely the same.

Consultation Method	Draft Local Plan Part 2 (August 2018 Consultation)	Draft Local Plan Part 2 'Further Focused Changes' (August 2019 consultation)
Consultation packs sent to statutory and general consultees on the consultation database	✓	✓
Consultation packs made available at libraries and Council offices	✓	✓
Consultation packs made available at Community Liaison Information Points	✓	✓
Email communications	✓	✓
Public notices in local press	✓	✓
Advertisements	✓	✓
Press releases	✓	✓
Web updates and social media announcements	✓	✓
Planning roadshows/consultation event	✓	✓
Local Plan Working Party	✓	✓

Call for Sites and Suggestions Aug – Sep 2016

Consultation and Publicity Materials

The Call for Sites and Suggestions consultation was issued on 18th August and formally closed on 30th September 2016 (a period of just over 6 weeks). However, an additional period of 4 weeks was extended for site promoters who were not originally consulted to submit any sites they had for consideration. This was due to a small administration error when transferring contact information from the Core Strategy Consultation database to the Local Plan Part 2 Consultation database.

Media and Publicity

Letters or emails were sent to well over 500 contacts on the Council's Local Plan Consultation Database, including all parish councils in the Borough, the relevant statutory bodies, etc. The consultation was also advertised on the Council's website and a press release was issued.

Regulation 18 Draft Local Plan Part 2 Consultation (August 2018)

Consultation and Publicity Materials

The table below sets out the consultation and publicity materials available during the consultation.

Consultation material	Details of publicity
Draft Local Plan Part 2: Development Management Policies, Site Allocations, Revised Housing Target	Available on Website, in hard copy at libraries across the Borough, Town Hall Reception or available to purchase for £35.00 from the Strategic Planning Team.
Draft Policies Maps - August 2018	
Draft Sustainability Appraisal Report - August 2018	
Draft Habitats Regulations Assessment - August 2018	
Consultation Boards	On display at consultation events and in Great Yarmouth Town Hall at other points during the consultation.
Comments Form	Available at libraries across the Borough, Town Hall reception or online on the Council's website.

Public Exhibitions

The table below details the public exhibition events which occurred during the consultation. These took the format of a drop-in session with exhibition boards and plans, where members of the public were able to discuss the contents of the plan and ask questions of officers.

Public exhibition event	Date/ time
Great Yarmouth Borough Council Town Hall	30/09/2018, 1pm - 7pm
Ormesby St Margaret, Village Hall	03/09/2018, 1pm - 7pm
Belton, New Road Sports & Village Centre	07/09/2018, 1pm - 7pm
Gorleston Library	19/09/2018, 11am - 5pm
Additional Exhibition Hemsby Sports & Social Club	21/09/2018, 1pm - 7pm

During the consultation there was significant concern around the plan and one proposed allocation (which also had a live planning application at the time of the August 2018 consultation). Therefore, an additional event was arranged in Hemsby and was well attended by members of the public.

Media and Publicity

The table below sets out the publicity coverage in the local press.

Media	Details of publicity
16th August 2018	
Great Yarmouth Mercury (online)	"Have you say on housing allocation targets for borough"
Great Yarmouth Borough Council Website	"Council to consult on draft planning document supporting growth and investment"
17th August 2018	
EDP Page 72	Statutory Notice
Great Yarmouth Mercury Page 72	Statutory Notice

There were also press releases on the Great Yarmouth Borough Council website and social media pages throughout the consultation and ahead of the public exhibitions to remind and attract further interest in them.

Regulation 18 Draft Local Plan Part 2 Further Focused Changes Consultation (August 2019)

Consultation and Publicity Materials

The table below sets out the consultation and publicity materials available during the consultation.

Consultation material	Details of publicity
Draft Local Plan Part 2 Further Focused Changes Consultation	Available on Website, in hard copy at Libraries across the Borough, Town Hall Reception or available to purchase for £35.00 from the Strategic Planning Team.
Draft Local Plan Part 2 Further Focused Changes Policies Map	
Draft Sustainability Appraisal Report - August 2019	
Draft Habitats Regulations Assessment - August 2019	
Interactive Leaflet	Produced during the consultation and was available at public exhibitions and online.
Consultation Boards	On display at consultation events and in Great Yarmouth Town Hall at other points during the consultation.

Consultation material	Details of publicity
Comments Form	Available at libraries across the Borough, Town Hall reception or online on the Council's website.

Public Exhibitions

The table below details the public exhibition events which occurred during the consultation. These took the format of a drop-in session with exhibition boards and plans, where members of the public were able to discuss the contents of the plan and ask questions of officers.

Public Exhibition Event	Date/time
Gorleston Library	10/09/2019, 1pm - 7pm
Great Yarmouth Market Gates Shopping Centre	18/09/2019, 1pm - 7pm
Caister Council Hall	23/09/2019, 1pm - 7pm

Media and Publicity

The table below sets out the publicity coverage in the local press.

Media	Details of publicity
16th August 2019	
EDP Page 62	Statutory Notice
Great Yarmouth Mercury Page 66	Statutory Notice
23rd August 2019	
EDP Page 69	Statutory Notice
Great Yarmouth Mercury Page 67	Statutory Notice
Great Yarmouth Mercury Page 49	"Have your say on future development across the Borough of Great Yarmouth"

There were also press releases on the Great Yarmouth Borough Council website and social media pages throughout the consultation and ahead of the public exhibitions to remind and attract further interest in them.

Other Engagement Undertaken During the Preparation of the Plan

Meeting with Community Groups and Parish Councils

The Borough Council has some established links with community groups and other organisations with which it maintains an ongoing dialogue. The table below details some of the meetings and engagement events undertaken.

Date	Details of meeting/ engagement event
26 th August 2016 and 31 st August 2016	Meeting with the Borough Council's Neighbourhoods & Communities team. Discussed community engagement, obtained list of community groups for further, communication. Put links to consultation on Facebook and Twitter, discussed how to engage with GRT (Gypsy Romany Traveller) Community to apply for call for sites.

Date	Details of meeting/ engagement event
16 th September 2019	Meeting with 'MESH' Board (Gorleston)
19 th September 2019	Meeting with 'Comeunity' Board(North South and Central Yarmouth)
23 rd September 2019	Meeting with 'Make it Happen' Board (Cobham and Southtown)
15 th September 2016	Meeting with Fleggburgh Parish Council to discuss Neighbourhood Plans, housing growth and call for sites & detailed policies suggestions
19 th September 2016	Parish Liaison Meeting discussing the progression of the plan and neighbourhood plans.
21 st September 2016	A meeting with Mautby Parish Council to discuss development options for the village, with emphasis on the progression of the detailed policies and site allocations document.
17 th October 2016	A meeting with Rollesby Parish Council regarding Local plan development and Neighbourhood Development Plan.
19 th October 2016	A meeting with Winterton Parish Council regarding Neighbourhood planning and general development.
1 st November 2016	A meeting with Somerton Parish Council regarding Local Plan & neighbourhood Plans
12 th December 2016	A meeting at Hopton Parish Hall regarding the Local Plan & neighbourhood Planning.
9 th January 2017	A further Neighbourhood Plan briefing following Hopton PC's intention to produce a NP.
20 th December 2018	A Neighbourhood Plan meeting for Fleggburgh Parish Council to explore the possible production of a NP
30 th October 2019	A Meeting with Hemsby Parish Council regarding Neighbourhood plan's.
15 th September 2016	A Meeting with Fleggburgh PC to discuss NPs, growth and call for sites & detailed policies suggestions
19 th September 2016	A Parish Liaison Meeting with a number of Parish Councils discussing the progression of the plan.
21 st September 2016	A meeting with Mautby PC to discuss development options for the village, with emphasis on the progression of the Local Plan.
17 th October 2016	A meeting to discuss Local plan development and Neighbourhood Development in Rollesby
19 th October 2016	A meeting to discuss Neighbourhood planning and general development meeting in Winterton
1 st November 2016	A meeting to discuss Local Plan & neighbourhood Plan at Somerton Parish Hall

Date	Details of meeting/ engagement event
12 th December 2016	A Briefing on Local Plan & neighbourhood Plan briefing at Hopton Parish Hall.
9 th January 2017	A Neighbourhood Plan briefing following Hopton PC's intention to produce a NP
20 th December 2018	A Neighbourhood Plan meeting for Fleggburgh Parish Council to explore the possible production of a neighbourhood plan
30 th October 2019	A Meeting with Hemsby Parish Council regarding Neighbourhood plan's.

Continuous engagement with the Agents and Developer's forum.

During the production of the Local Plan an Agents and Developer's Forum has been set up to discuss and work with developers and agents in an effort to boost house building delivery within the Borough. During these meetings several issues have been raised and discussed and subsequently addressed within the emerging Local Plan as exemplified below.

- The importance of reducing planning risks as far as practicable.
- S106 pooling restrictions removal, question whether CIL would be appropriate for the Borough.
- Open space and appropriate policy for the maintenance of them.
- Viability of sites within the Borough and the issues of delivering these sites.
- Other frustrations with the planning system, PINS or wider market forces inhibiting bringing development forward.

These issues have been addressed within the plan, some have been considered within wider planning process, such as the introduction of the chargeable pre-application process to help remove planning risks for developers. With the removal of Section 106 pooling restrictions and with viability as a consideration within the Borough, it is not currently deemed necessary to review the need for CIL through the emerging local plan. Comments raised regarding the management of open space were picked up in the production of Policy H4 'Open space provision for new housing development'. Viability of sites was considered within the whole plan viability assessment, which was produced in consultation with the members of the Agents and Developers Forum.

How Did The Council Respond To Comments Received

This section identifies how comments raised during the Policy and Site Suggestions Consultation (September 2016), the Draft Local Plan Part 2 consultation (August 2018) and the Draft Local Plan Part 2 Further Focused Changes Consultation (August 2019) were taken into account in the final Draft Local Plan Part 2 (Regulation 19 version). Comments are broken down into the main sections of the plan where they relate, not necessarily where they were appended by respondents. Full versions of the comments are available to view on the Council's consultation portal website <https://great-yarmouth-consult.objective.co.uk/portal>. The Policy references are listed as they were consulted on, however the policy reference in the Reg 19 version of the document is listed in brackets next to the policy where there was a change.

Regulation 18 Policy and Site Suggestions Consultation

There were 151 responses received for the policy and site suggestions. 129 of these responses were sites submitted for potential inclusion within the plan which have all been assessed and consulted on as part of the Regulation 18 Draft Plan consultation in August 2018. Of the other responses received the following key issues have been summarised below:

- The plan should recognise the importance of safeguarding cultural and community facilities
- Objection to travellers and gypsies owning their own sites
- The plan should new scope on town centre areas, such as the Railway Station, North Quay, the Conge with a similar style of development to that carried out at the energy park
- Wanted land added to development limits to allow for future development
- Plan should prevent infill development on private gardens
- Amend development limits of Filby to prevent future development of the village
- Further services would need to be provided if there is further development in Belton
- Suggestions regarding the Historic Environment in Local Plans and Site Allocations and the importance of considering this in allocating sites
- Proposals to designate areas of local green space
- Proposed use for carpark and picnic area to serve woodland in Fritton
- Greater emphasis to be given to the approval of small suitable sites in secondary and tertiary villages
- Full consideration of the natural environment should be given in the process of selecting and assessing sites for allocation through the Local Plan
- Amendments suggested to Policy CS6 – Supporting the Local Economy
- Amendments suggested to Policy CS17 and Waterfront policy
- Suggestion regarding the training of young people in skilled labour
- Suggestion for the upgrading of windmill and gardens as a visitor exhibition
- Comments relating to the siting of schools and their required infrastructure, as well as comments regarding developer contributions and CIL
- Suggestion to amend development boundaries in Burgh Castle to acknowledge the changes in the village
- Policy suggestions relating to the protection and designation of Holiday Accommodation areas. Comments also go on to detailed policy suggestions for the tourism industry in the borough and the assessment of sites in terms of coastal risk and protection
- Suggestion of a community centre in line with Policy CS18(g). A Church were expressing an active interest in developing the community aspects at Beacon Park. (It was noted that no particular site was proposed)

Following these suggestions for policies and sites to be incorporated into the plan these suggestions were explored by officers. Then where appropriate these suggestions were taken forward and incorporated into the plan.

Draft Local Plan Part 2 Development Management Policies, Site Allocations and Revised Housing Target Consultation (August 2018)

The table below sets out the number of respondents and comments received to the consultation.

Document	Number of Representations	Number of Representors	Website	Letter	Email
Draft Local Plan Part 2	718	235	158	302	258
Draft Habitats Regulation Assessment 2018	3	3	0	3	0
Draft Sustainability Appraisal Report	11	7	0	5	6
Total	732	235*	158	310	264

*Respondents to Habitats Assessment and Sustainability Appraisal also commented on the Draft Local Plan, so are not additional.

The following sections summarise the comments received on each part of the consultation document and how the Council has taken those comments into account in the Final Draft Local Plan Part 2.

Plan overall, and Introduction

Comments Summary

Statutory consultees

Filby Parish Council – Supported plan overall.

Winterton Parish Council – Supported plan overall.

Marine Management Organisation (MMO) – Recommended addition of references to MMO and its plans/duties, etc.

Broads Authority (BA) – Identified typos, etc.

Norfolk County Council (NCC) Historic Environment – Inclusion of heritage on Constraints and Opportunities Map is useful.

Other Consultees

No Comments

How these comments were taken into account

Comments and general support was noted. No fundamental change to Plan approach, but the document organisation and introductory etc. text was significant updated to reflect the further plan stages and references to revised NPPF, etc.

Policy UCS3-dp: Reduction of Core Strategy Housing Target

Comments Summary

Statutory consultees

Rollesby Parish Council – Objected to proposal not to increase overall target in order to try to provide additional affordable housing.

Norfolk County Council - Accepted reduced housing target. Reduced housing needs figures in line with new methodology and population projections - recognise the need for affordable/social renting as well as government policy drivers on "affordable" ownership - issues of delivery due to low land and house values.

Broads Authority – Suggested mentioning of the agreement between BA & GYBC distribution of Borough housing target across plan area boundaries.

Waveney District Council (Now East Suffolk Council) – Supported approach to gain more realistic and achievable target, and reduce risk of plan-led system being undermined. Suggested clarification that housing market area remains the Borough.

Other Consultees

Flegg Community Land Trust – Community led housing could help meet housing targets.

Rt Hon Brandon Lewis MP - Housebuilding is essential part of economic growth of the Borough, however developments should be carefully chosen. Appreciates that the Borough's geography poses particular challenges to developers.

Home Builders Federation (HBF) and 6 developers - Objected to reduction in target, on grounds and raised a number of issues including: Core Strategy was sound; new standard method is a minima; NPPF does not require Core Strategy to be changed; does not fundamentally change relationship between housing, economy, & infrastructure, etc.; Council has never delivered adequate housing numbers.; leaves Council open to legal challenges; Government has indicated its intention to further review method; more sites should be allocated; over-reliance on windfall sites; NPPF now requires 10% of small sites to be identified; Council has no intention of trying to follow national policy and meet affordable housing needs homes, but would rather protect its land supply and maintain housing delivery at lower levels regardless of the consequences

Royal Society for the Protection of Birds (RSPB) – Supported reduction as it will minimise impacts on designated sites whilst still being sufficient to meet the housing needs of the area.

Campaign to Protect Rural England (CPRE) Norfolk – Welcomed reduced target. There is very little evidence increasing the amount of land available actually increases the rate at which houses are built.

How these comments were taken into account

Developers/landowners argued that a higher target is required and a corresponding release of their land, while environmental and resident led organisations are supportive of the change. The case was made that a somewhat higher level of allocations (and buffer) than provided in the draft may be appropriate in both ensuring that an appropriate balance is made between avoiding constraining levels of growth and ensuring development takes place in the best way possible, and in avoiding the impression that the reduction in target is intended to constrain growth. Therefore the policy has been retained, however, further work was undertaken and changes to the number of allocations within the plan were made.

Policy UCS7a-dp: Change to Great Yarmouth Town Centre Boundary (Policy USC7 in Reg 19 Version)

Comments Summary

Statutory consultees

No Comments

Other Consultees

Ellandi (Agents for Market Gates Shopping Centre) – supported amendment.

Individual – The Minster (included in revised area) is developing its own strategic plan and wishes to be involved in proposals for the town centre area.

How these comments were taken into account

No changes were sought to the policy following the supporting comment and note of Great Yarmouth Minster. However further changes were sought during the plan making process following this consultation and this policy was consulted upon in the August 2019 Further Focused Changes Consultation.

Policy UCS7b-dp: Addition of a District Centre Boundary for Beacon Park

Comments Summary

No Comments received.

How these comments were taken into account

It was considered desirable to amend the boundary slightly from that shown in the Draft, in the light of advice from the Council's Property Services, who act for the landowner, Great Yarmouth Borough Council.

Therefore this policy was amended and was consulted upon in the Reg 18 August 2019 Further Focused Changes Consultation.

Development Management Policies

Comments Summary

Statutory consultees

Rollesby Parish Council – Agreed with section content. Felt there needs to be more imagination by developers on style and types of dwelling built. Would like to see more sustainable developments, including better insulation, rainwater recovery, solar panels, shared wind towers, eco houses, etc.

Broads Authority – An area similar to the Broads is identified by Natural England as one of potential for exceptional waterlogged heritage. It may be something to consider in policy.

Natural England – Suggested where type and scale of development uncertain, or a supplementary planning document is specified, a project level habitats assessment should be undertaken. Noted that NPPF paragraph numbering has changed, and references in the Plan to these will require updating.

Other Consultees

No Comments received.

How these comments were taken into account

The policies in the plan encourage, but cannot demand the types of development that Rollesby Parish Council sought. The policies in the plan are considered adequate to address waterlogged heritage where appropriate. The requirements for habitats assessments are set out in law. This does not need to be duplicated in policy.

Policy G1-dp: Development Limits (Policy GSP1 in Reg 19 Version)

Comments Summary

Statutory consultees

Rollsby Parish Council - Agreed with General Policies (i.e. those with G suffix in Reg 18 draft version)

Anglian Water – Policy should be amended to make clear that infrastructure works (e.g. water and sewerage) can be developed outside limits.

Norfolk County Council Historic Environment – The mention of heritage assets in supporting text is useful.

Other Consultees

Flegg Community Land Trust (CLT) - Policy G1-dp should be strengthened to allow include community-led schemes outside development limits (including with market housing cross-subsidizing affordable dwellings).

Persimmon (House Builder) – Development Limits are sufficient to prevent merging of settlements (objection to separate ‘Strategic Gaps policy)

Pleasure & Leisure – Development Limits should be amended to include site promoted in Bradwell.

Rt Hon Brandon Lewis MP - Would support more explicit policies to help ensure that natural community boundaries are retained. This is also a concern in Caister, especially to the north of the village. Supported strong action by the Borough Council to prevent reckless excessive developments within these communities.

CPRE Norfolk - Supported maintaining development limits, etc. as best way to maintain rural character, maintain strategic gaps, and concentrate development in urban etc. areas with facilities.

How these comments were taken into account

Policy has been carried forward into the final draft plan, but wording has been amended to permit infrastructure development and agricultural development outside the limits. Also amended wording to make policy more succinct with more reference to policies in supporting text rather than policy itself.

Changes to the development limits were made where necessary to reflect additional allocations or permitted planning applications up to the regulation 19 consultation.

Policy G2-dp: Strategic Gaps Between Settlements (Policy GSP3 in Reg 19 Version)

Comments Summary

Statutory consultees

Norfolk County Council Landscape – The location of the gaps appeared to be well considered, and addition of Caister and Ormesby St. Margaret were supported.

Broads Authority - Strategic gaps policy is welcomed, but unclear how to read the map symbols (are these the extent of the policy?).

Waveney District Council (now East Suffolk Council) – Wishes to see complementary reference to that in emerging Waveney Local Plan presuming against coalescence of Hopton and Corton.

Hemsby Parish Council – Supports principle, but would like to see Hemsby so protected.

Other Consultees

CPRE Norfolk – It is essential to maintain these strategic gaps.

How these comments were taken into account

It was not considered necessary or desirable to add further strategic gaps for settlements such as Hemsby which are not at the same risk of coalescence as those identified. The development limits are considered an adequate tool in those circumstances.

The policy has been carried forward into the final draft plan. The desirability of maintaining a clear separation between Corton (in Waveney, and where significant development is planned) and Hopton has now been specifically identified in this policy. There was a challenge in representing the strategic gaps on a map. Therefore, the gaps were removed from the policies map to remove possible confusion over previous lines with triangles being too prescriptive over what would constitute coalescence.

Policy G3-dp: Amenity (Policy A1 in Reg 19 Version)

Comments Summary

Statutory consultees

Anglian Water – Advised additional caveat regarding odour risks in vicinity of sewage treatment works.

Norfolk County Council Public Health – There is a general awareness around air quality, travel planning, public and active transport.

Other Consultees

Holiday Park Operator – Endorsed policy. This is important to maintaining attractive, viable destination for holidaymakers in the long term.

Individual – Strongly supported policy.

How these comments were taken into account

Policy has been carried forward into the Final Draft Plan, with additional text in the supporting text to note the requirement of odours and dust within the policy and amended supporting text.

Policy G4-dp: Planning Obligations (Policy GSP8 in Reg 19 Version)

Comments Summary

Statutory consultees

Broads Authority – Wished to see GYBC affordable housing zones shown for the part of the Borough within the Broads, as these are applied there.

Norfolk County Council – Welcomed the policy, and in particular the reference to the County’s Planning Obligations Standards. Suggested additional references in supporting text to limitations on planning obligations in regulations.

Rollesby Parish Council – Planning obligations should be enforced robustly.

Other Consultees

James Paget Hospital Trust – Wished to open dialogue to explore opportunities for potential planning contribution funding for healthcare.

Individual – Planning permission should not be granted unless highways access adequacy and safety are properly scrutinised by highway authority and any other concerned parties.

How these comments were taken into account

The Broads Authority’s request could not properly be met as the area in question is outside the Borough Council’s planning area. One of the County Council’s suggested references to regulations was considered appropriate, the other has since been superseded by new regulations. Highways safety is covered by other local and national policies. The policy has been carried forward into the final draft plan with increased reference added on the limitations which apply to planning obligations and also reference to the possibility of contributions towards healthcare infrastructure.

Policy G5-dp: Early Local Plan Review (Policy removed from Reg 19 Version)

Comments Summary

Statutory consultees

Natural England – the Local Plan review should be subject of a Habitats Regulations Assessment (HRA).

Other Consultees

Property Consultant - Strongly supported an early review as its clients have sites that are ideally suited for development to meet the needs of the Borough.

How these comments were taken into account

The Plan will have a Habitats Regulations Assessment, in order to meet legal requirements: that did not need to be explicitly identified in this policy.

Policy was deleted and reference to the early review of the local plan was added to the plan introduction as this is not required to be a explicit policy.

Policy G6-dp: Advertisements (Policy A3 in Reg 19 Version)

Comments Summary

Statutory consultees

Norfolk County Council Landscape - Supported policy, and coverage in general, but would wish to see landscape also explicitly identified.

Other Consultees

No Comments

How these comments were taken into account

The Policy was carried forward into the final draft plan, as policy wording is considered to appropriately address impact on landscape.

Affordable Housing (n.b. no Draft Policy consulted on at the time)*Comments Summary***Statutory consultees**

Somerton Parish Council - Present policies have failed to deliver the much-needed affordable housing, especially in rural areas. There is a need for more information/understanding of implications of second homes. Suggested a particular wording to promote development by community land trusts.

Hemsby Parish Council - The identified primary need for Affordable Homes for rental is unattainable. Clearly, a revival of public sector housing development is one way of resolving this issue, subject to funding. This should be formally communicated to central government.

Other Consultees

Flegg Community Land Trust - It seems important to conclude that the identified primary need for Affordable Homes for rental is unattainable. Clearly, a revival of public sector housing development is one way of resolving this issue if only the requisite funding could be secured. It is essential that this is formally communicated to central government in order to provide immediate feedback and perhaps elicit a long term policy change.

CPRE Norfolk - The need for more affordable housing is close to overwhelming, private developers are unlikely to prioritise delivery of these, so GYBC and central Government should do more to provide it where needed. Supports small scale social affordable housing developments where needed, including exception sites within rural settlements, and larger numbers more urban areas.

How these comments were taken into account

The consultation draft Local Plan did not include any policy for affordable housing because there is already a fairly detailed policy on in the Core Strategy, CS4, which was considered adequate. The Core Strategy policies are supportive of the types of development sought by the parish councils and other representors. Their observations and aspirations for national affordable housing policy cannot be addressed by the local plan. A fuller review of affordable housing policy will be undertaken as part of the next local plan, and work will begin on this as soon as this Local Plan Part 2 is in place. An additional policy has been added to the final draft plan to add detail on affordable housing tenure to ensure the types of affordable housing most in need are delivered, particularly those for rent.

Policy H1-dp: Rural Workers' Dwellings (Policy H5 in Reg 19 Version)*Comments Summary***Statutory consultees**

No Comments

Other Consultees

Flegg Community Land Trust - There should be a resurgence of 'Permitted agricultural related new dwellings for agricultural workers and other key workers on basic wages.

How these comments were taken into account

The policy as it was sought to address aspirations such as those of the CLT's, and no specific change was made to the policy.

Policy H2-dp: Occupationally Restricted Dwellings (Policy H6 in Reg 19 Version)

Comments Summary

Statutory consultees

Broads Authority – Identified a slight ambiguity in wording.

Other Consultees

No comments

How these comments were taken into account

Policy was carried forward with the slight ambiguity clarified.

Policy H3-dp: Conversion of Rural Buildings to Residential Uses (Policy H7 in Reg 19 Version)

Comments Summary

Statutory consultees

Norfolk County Council – Historic Environment – supported policy.

Historic England – Sought clarification whether policy includes designated heritage assets.

RSPB – Policy should address potential displacement of protected wildlife, e.g. owls & bats.

Other Consultees

Property Consultant - Policy was supported. Removing the need for costly ecological and building surveys was welcomed. The cost savings will allow for greater investment in the design and mat.

How these comments were taken into account

Policy has been carried forward into the final draft plan with revised wording to clarify intention and application of the policy regarding historic buildings, and the addition of a criterion regarding protected wildlife.

Draft Policy H4-dp: Replacement Dwellings Outside of the Development Limits (Policy H8 in Reg 19 Version)

Comments Summary

Statutory consultees

Norfolk County Council Historic Environment – Supported Policy

Other Consultees

No comments

How these comments were taken into account

Policy has been carried forward into final draft plan.

Policy H5-dp: Residential annexes (Policy H10 in Reg 19 Version)

Statutory consultees

Broads Authority – Refers to these as residential ancillary accommodations.

Other Consultees

No comments

How these comments were taken into account

Policy has been carried forward into final draft plan.

Policy H6-dp: Housing for the Elderly and other Vulnerable Users (Policy H11 in Reg 19 Version)*Comments Summary*

Statutory consultees

Hemsby Parish Council - Hemsby has had more than its fair share of housing for the elderly. Such areas should not be expected to accept more without consultation.

Other Consultees

NPS Property Consultants - Wording should acknowledge occasions where development of residential / specialists accommodation outside of development limits is suitable (e.g. hospice south of Beacon Park).

How these comments were taken into account

In terms of comments by Hemsby Parish Council, all planning applications have to be subject to consultation as per legislation. The Borough has a high need for housing suitable for the elderly and therefore it would not be justified to prohibit this type of housing in appropriate, sustainable locations.

The policy does provide for certain developments outside development boundaries, and exceptional cases can be properly approved contrary to the policy where there is justification. It was considered impractical to list every potential exception and challenging to do so in a way that does not include developments for which there is no such exceptional justification. Changes have been made to the policy to allow further flexibility for development outside of development limits.

Policy H7-dp: Houses in Multiple Occupation (HMOs) (Policy H12 in Reg 19 Version)*Comments Summary*

Statutory consultees

Hemsby Parish Council - It seemed contradictory that whilst HMOs provide a much needed form of affordable housing, which is otherwise acknowledged as difficult to deliver, that there are so many constraints put forward to limit such establishments.

Other Consultees

No Comments

How these comments were taken into account

The value to the area of HMOs is acknowledged, and the policy seeks to ensure, as far as practicable, that the problems that are sometimes associated with them are avoided. Some adjustments to the policy and supporting text have been made to reflect the fact that smaller HMOs (those with 6 or fewer people) tend to have lower impacts than larger HMOs, and hence slightly less onerous criteria are more appropriate for these. The policy was significantly amended following the consultation and therefore was deemed necessary to consult upon in the August 2019 Further Focused Changes Consultation.

Policy H8-dp: Residential Extensions (Policy H9 in Reg 19 Version)Comments Summary

Statutory consultees

No Comments

Other Consultees

Individual: Agreed with policy. Strongly supported criterion 'B'.

How these comments were taken into account

Policy has been carried forward into final draft plan.

Policy H9-dp: Traveller Accommodation (Removed from Reg 19 Version)Comments Summary

Statutory consultees

No Comments

Other Consultees

RSPB - The policy should make clear that any allocations will not be sited close to protected (nature conservation) sites or where they could adversely affect the integrity of these.

How these comments were taken into account

The policy has not been included in the final draft plan, given the limited need for this type of development and due to the provision of a suitably worded criterion-based policy already included in the Core Strategy (Local Plan Part 1)

Policy H10-dp: Delivering Affordable Housing on Phased or Cumulative Development (Policy H2 in Reg 19 Version)Comments Summary

Statutory consultees

Hemsby Parish Council - Policies to protect and promote affordable housing need to be strengthened and supplemented to maximise delivery.

Other Consultees

No Comments

How these comments were taken into account

Policy has been carried forward into final draft plan with slight amendment to ensure clarity of intention.

Policy H11-dp: Housing Design Principles (Policy A2 in Reg 19 Version)*Comments Summary***Statutory consultees**

Broads Authority - Had the Borough considered supporting 'lifetime housing' through policy.

Other Consultees

No comments

How these comments were taken into account

The lifetime homes standard has been replaced with the adaptable homes standard in Part M4(2) of the Building Regulations. The policy has been carried forward into the final draft plan and now requires all new housing to meet the adaptable homes standard where practicable.

Policy H12-dp: Open Space Provision for New Housing Development (Policy H4 in Reg 19 Version)*Comments Summary***Statutory consultees**

Environment Agency - Welcomed policy, advised open space biodiversity should also be maximized, with various suggestions for how this could be achieved. so suggests it incorporates (a) management of green open spaces specified to maximise ecological value, e.g. planting wildflower meadows, and trees alongside paths; (b) Private gardens can be hotspots for biodiversity, especially in urbanised areas. Encourage 'permeable' garden to provide better connectivity for hedgehogs, reptiles and amphibians; (c) Opportunities to engage children with wildlife and the environment should be explored, e.g. placing wildlife features such as hibernacula and bug hotels around play areas.

Natural England - Supported the provision of 40% accessible natural green space onsite or equivalent financial contribution. Agreed with HRA that policy should be based on recent assessment, baseline information and identified deficit within the local area. Loss of open space caused by a development should be replaced by equivalent or improved provision in terms of both quality and quantity.

Rollesby Parish Council – Do S.106 contributions go to the village where the development is happening? Would not all developers prefer financial contribution to maintenance in perpetuity!! How is maintenance charge calculated?

Sport England – Policy takes a very standardised approach to new provision, and does not factor in local spatial variations in provision. For smaller developments usually preferable to obtain financial contribution to improve existing facilities for outdoor sport in the locality. Sport England supports the flexibility within the policy to adapt to local requirements.

Other Consultees

Individual - Green spaces often lost after planning consent is granted, when developer seeks further amendments. Requirements should be rigorously enforced.

How these comments were taken into account

A direct response was provided to Rollesby Parish Council's questions, none of which require any change to the policy.

The Policy has been carried forward into the final draft plan, with an added criterion promoting biodiversity.

Policy H13-dp: Housing Applications Reliant on the 'Presumption in Favour of Sustainable Development' (Policy H13 in Reg 19 Version)

Comments SummaryStatutory consultees

Rollesby Parish Council – Stated that years to start a development is 3 years to long , if they cannot start within 2 years, get another developer in, that would stop them land banking also no developer who is sitting on more than 2 sites in one borough that have planning permission should be allowed to apply for any more in that borough until they at least starts one of them, also there should be a completion date, until the council imposes tougher conditions on starting and finishing developments, there will always be land banking by developers as it is in there interest to sit on land until required ie the prices rise.

Broads Authority – Development in GYBC has the potential, if near to the border with the Broads, to affect the Broads. The only caveat to applying policies flexibly is that relating to timing of delivery. How will impact on the Broads be upheld in such circumstances?

Natural England - Requested that the Policy clearly states that flexibility will not negate environmental objectives as specified in section 8a [*presumably 8c intended*] of the NPPF or the assessment of impacts to designated sites and the possible need for mitigation.

Other Consultees

Persimmon Homes (House Builder)- Policy was broadly supported (it appears to be a version of the current Interim Housing Land Supply Policy). However, the wording as was currently drafted would not favour larger sites coming forward as it may be the case that only part may be deliverable within 5 years. To avoid this discriminatory interpretation against larger sites it was suggested that the latter part of the first paragraph be amended to read:- *".....development plan where it is robustly demonstrated that the development will be commenced promptly and deliver a reasonable proportion of the site within a 5 Year period"*.

Pleasure & Leisure Corporation - Supports this policy, in the context of the site at Emerald Park.

CPRE Norfolk - suggested strengthening part of the policy wording in line with that in the NPPF, i.e. "To help ensure that proposals for housing development are implemented in a timely manner, local planning authorities should consider imposing a planning condition providing that development must begin within a timescale shorter than the relevant default period, where this would expedite the development without threatening its deliverability or viability."

How these comments were taken into account

While the Borough Council shares some of the frustrations expressed by Rollesby Parish Council, the particular solutions it proposes are not likely to be practicable or compatible with national planning policy. There is still national planning policy protecting the natural environment, and particularly

strongly the Broads, even in the absence of a 5 year housing land supply. The CPRE's suggestion was considered better dealt with by a slight change to wording.

Policy has been carried forward but revised to make it more focussed on delivery, particularly with respect to outline application. The policy no longer makes reference to favourable consideration to housing in the event of a lack of five year supply or failure to meet the housing delivery test, therefore it is not necessary to make reference to the environmental concerns raised.

Policy R1-dp: Location of Retail Development (Policy R1 in Reg 19 Version)

Comments Summary

Statutory consultees

Norfolk County Council Public Health - The settlement hierarchy does look to generally locate retail and employment close to urban development (though that still may require travel).

Other Consultees

Rt Hon Brandon Lewis, MP - Developments need to be considered alongside the need to create new sources of local employment. Essential that all possible support is given to our retail offer.

Ellandi (Retail Mall Operator) - Supported the main thrust of the Policy, but objected to the current wording. The objection would be removed subject to the following: comments on a Primary Shopping Area (*see Policy R1-dp, below*) being taken on board/accommodated; and reference being made to requirement of Core Strategy Policy CS7 for further retail development over 200sqm (net) in edge and out of centre locations to submit a Retail Impact Assessment to avoid adverse impact on the town centres.

Individual – Agreed with Policy. Town centre has been damaged by uncontrolled retail development on 'industrial' parks, which have also led (e.g. Gapton Hall) to severe traffic problems; large blocks of housing have been developed without adequate neighbourhood shopping. Development of retail outlets are generally supported, but no new retail development attracting a large volume of traffic should be allowed unless the developer can show that the road infrastructure is adequate.

How these comments were taken into account

The Policy CS7 200sq m threshold does not need to be duplicated, but reference to it was highlighted in the supporting text.

The Policy has been carried forward into the final draft plan but was amended in regards to the changes in the town centre boundary and primary shopping areas. The supporting text was also amended throughout.

Policy R2-dp: Protected Shopping Frontage (Policy R2 in Reg 19 Version)

Comments Summary

Statutory consultees

No Comments

Other Consultees

Ellandi (Retail Mall Operator) – Supported the principle of the Policy subject to Market Gates continuing to be excluded as identified frontage (continued flexibility to delivery range of retail, leisure etc). Policy criteria in Policy R2-dp considered flexible (allowing changes without unacceptable impact), though criteria iii is somewhat difficult

to follow and could be made clearer.

How these comments were taken into account

The value of excluding Market Gates Shopping Centre from the Protected Shopping Frontage (enabling greater flexibility to deliver range of quality retail, leisure, etc.) is acknowledged. Policy has been carried forward but amended to improve clarity of intention.

Policy R3 – dp: Kiosks and Stalls (Policy R6 in Reg 19 Version)

Comments Summary

Statutory consultees

Hemsby Parish Council – Broadly supported Policy, in particular criteria R3-dp D (provision of adequate refuse storage and litter bins). Policy could benefit from similar criteria (R5-dp C) which would consider cumulative impact and effects of clusters (kiosks and stalls) or particular types of uses, on an area.

Other Consultees

No Comments

How these comments were taken into account

Policy has been carried forward, but with additional criterion on cumulative impacts.

Policy R4–dp: Rural Retailing (Policy R8 in Reg 19 Version)

Comments Summary

No comments were received

How these comments were taken into account

Policy has been carried forward.

Policy R5-dp: Food and Drink Uses (Policy R7 in Reg 19 Version)

Comments Summary

Statutory consultees

Hemsby Parish Council – Broad support for Policy, in particular criteria R5-dp C (considering cumulative impact and effects of clusters of such uses, or particular types of uses, on an area. Policy could benefit from similar criteria (R3-dp D) providing adequate refuse storage and litter bins.

Norfolk County Council Public Health – No explicit policies on fast food or alcohol i.e. prevalence or proximity to schools. Mainly phrased in terms of nuisance, litter, amenity etc.

Other Consultees

Ellandi (Retail Mall Operator) – Objected. Policies implies that A3 food and drink uses will be supported regardless of location, subject to criteria. Considered contrary to national and local adopted policy (i.e. applying sequential test).

How these comments were taken into account

While an important purpose of planning is to encourage health and well-being, the use of policies on development seeking to influence diet is a relatively untested field. Policies which restrict takeaways within a certain distance of schools have been adopted by a few planning authorities, but there is as yet no clear evidence that they actually achieve their intention of encouraging healthier eating by

children. Such a policy could also be inappropriate in some locations with schools (e.g. Great Yarmouth Market Place). It may also perhaps be the case that proximity of takeaways to childrens' homes, rather than their schools, is of greater influence on their diet. Therefore it was considered that such a policy is not quite an appropriate solution in the context of Great Yarmouth. The situation can be reviewed when preparation of the next local plan is prepared, when there might be more evidence as to whether that (or any other approach) is helpful in meeting the objective. Refuse storage is already covered by the policy, but the provision of litter bins would be a useful additional criterion.

The policy has been carried forward into the final draft plan with amended wording to require provision of adequate litter bins and to change the context of the policy so it does not relate to the principle of new food and drink uses (which is covered by other policies) but rather the detailed considerations relevant to these proposals.

Policy B1-dp: Business Development (Policy B1 in Reg 19 Version)

Comments Summary

Statutory consultees

Hemsby Parish Council: Broadly supported the policy.

Norfolk County Council - Welcomed the positive policies relating to Business, Leisure and Tourism Development.

Other Consultees

Ellandi (Retail Mall Operator): Welcomed the clarification that the term 'business development' here does not include/encompass retail, food and drink or housing uses.

How these comments were taken into account

The policy has been carried forward into the final draft plan.

Leisure Development (introductory chapter)

Comments Summary

Statutory consultees

Hemsby Parish Council – Broadly supportive of the leisure policies within chapter which may be helpful for Hemsby, however specific leisure-based policies, applicable to Hemsby, should be provided as is the case in the Gorleston and Great Yarmouth sections.

Other Consultees

RSPB – Reference to “potential adverse effects” should be expanded to read “potential adverse effects on the integrity of these sites”. This better reflects the Habitats Regulations test.

How these comments were taken into account

The general leisure policies were considered adequate for Hemsby and other areas of this nature. Hemsby Parish Council is preparing a neighbourhood plan, and this provides it with the potential to produce its own specific leisure-based policies for Hemsby. The introductory text has been removed so the point made by the RSPB does not need to be addressed.

Policy L1-dp: Holiday Areas (Policy L1 in Reg 19 Version)

Comments Summary

Statutory consultees

Hemsby Parish Council – Objected to exclusion of Pontins site from Holiday Area. Future tourism needs in Hemsby needs to be closely related, contiguous, with existing leisure area. Given the present geography, any expansion of Hemsby's tourism industry is unlikely to be achieved if Pontins site is developed for housing. Concern that other leisure operators will follow a similar medium to long term plan, closing down and promoting their sites for housing, resulting in collapse of the tourism sector in the village which currently provides a different offer to GY i.e. low cost and value for money. That the site has not been in tourism use for a number of years is not a valid reason for another use, instead a forward plan to redeliver tourism at Pontins should be put in place.

Broads Authority – Identified a slight ambiguity regarding policy number format

Other Consultees

RSPB – Was unclear whether draft policy adequately ensured new leisure development proposals will not compromise the conservation objectives of designated sites. The Policy should be highlight the need for leisure proposals to contribute to the Mitigation and Monitoring Strategy, as per Policy L3-dp.

Bourne Leisure – Was generally supportive of Policy but should be revised to also include reference to static caravans; promote upgrading of chalet and caravan parks and provision of new accommodation in such locations; and be suitably flexible to encourage other forms of tourist accommodation (e.g. serviced apartments), to meet the changing needs and demands of visitors. Suggested specific rewording.

Tingdene Holiday Parks – Objected to removal of the former golf driving range, Redwings Sanctuary & visitor centre, and existing tourism facilities at Caldecott Hall complex from its former designation as 'Prime Holiday Attraction' and failure to allocate as part of the proposed 'Holiday Area' Policy. Considered to devalue importance of existing tourism facilities on site and limits the opportunity for the site to adapt to changing demands of consumers for year-round accommodation as offered by Policy CS8 and draft Policy L1-dp. Inclusion of former golf driving range would enable well screened, accessible site to be used for camping/caravan, permissible under L2-dp.

Somerleyton Estate – Objected. Explicit reference to 'self-catering holiday lodges and cabins' should be included within the Policy as these are key drivers in the tourist accommodation sector. This would support growth at Fritton Lakes and ensure compliancy with NPPF 80, 82 & 83 (supporting economic growth/productivity, addressing locational requirements of specific sectors, encouraging sustainable rural tourism).

How these comments were taken into account

The Pontins allocation is dealt with in Hemsby allocation section of this document. The policy has been carried forward into the final draft plan with amendments to better reflect the relationship with Policy L2, clarification reference to protected habitats in supporting text and reviewed the Holiday Areas to take into account comments from Somerleyton Estate reflecting the existing accommodation at Fritton Lakes. It was not considered appropriate to identify the area suggested by Tingdene Holiday parks as the area does not currently comprise accommodation.

Policy L2-dp: Camping and Touring Caravans (Policy Removed in Reg 19 Version)

Comments Summary

Statutory consultees

Hemsby Parish Council – Endorsed policy.

Norfolk County Council Lead Local Flood Authority – Policy should include additional criteria on flood risk.

Other Consultees

RSPB –The Policy should be explicit, requiring proposals to contribute to the Mitigation and Monitoring Strategy (consistent with Policy L3-dp).

Bourne Leisure – Amendments required to policy title and wording ('static', 'upgrading'). Criteria F too restrictive and should allow development (where appropriate) if overall scheme outweighs harm to the environment.

Tingdene Holiday Parks – Amendments required to policy title ('static').

How these comments were taken into account

Policy has been removed as there is adequate coverage through Policies L1 and L2(formerly L3-dp) in the final draft plan.

Policy L3-dp: Small-scale Countryside Tourism Facilities (Policy amended as part of L2 in Reg 19 Version)

Comments Summary

Statutory consultees

Hemsby Parish Council – Endorsed policy

Other Consultees

No Comments

How these comments were taken into account

Policy has been amended and expanded to cover element of former draft policy L2-dp

Policy L4-dp: Commercial Scale Equestrian Development (Policy now amended as part of L3 in Reg 19 Version)

Comments Summary

Statutory consultees

Broads Authority – Policy should refer to the setting of the Broads

Other Consultees

RSPB –The Policy should be explicit, requiring proposals to contribute to the Mitigation and Monitoring Strategy (consistent with Policy L3-dp).

How these comments were taken into account

New equestrian development proposals are not addressed by the Habitats Monitoring and Mitigation Strategy, but any potential for impacts on protected habitats sites would be addressed by

a development specific habitats regulations assessment. Reference to the Broads is not considered necessary as landscape considerations are covered in the policy and the Broads is given protection by Policy E4, Policy CS11 of the Core Strategy and National Planning Policy.

Policy has been carried forward and merged with draft Policy L5-dp below.

Policy L5-dp: Animal Field Shelters and Ancillary Facilities (Removed from Reg 19 Version as amalgamated with L3)

Comments Summary

No comments were received.

How these comments were taken into account

Policy was removed and amalgamated with the above commercial scale equestrian developments policy into one single policy to address equestrian development.

Environment Section

Comments Summary

Statutory consultees

Historic England – Various comments and suggestions were received regarding built & archaeological heritage.

Environment Agency - Currently no policy to ensure that foul drainage infrastructure is provided in a timely manner ahead of occupation of new properties, in order to avoid major water environment quality problems. Also ecological aims of the Water Framework Directive (WFD) should be addressed. Various specific suggestions.

Norfolk County Council Lead Local Flood Authority – Suggested update/clarification of supporting text.

Other Consultees

Norfolk Wildlife Trust – Concerned about lack of reference to County Wildlife Sites (CWSs)
Individual – Considers a policy to protect dark skies is overdue, and specifically refers to a need in relation to Hemsby.

How these comments were taken into account

County Wildlife Sites were already explicitly accorded protection by Core Strategy Policy CS11. Otherwise, the various policy suggestions were generally accepted, and are included in relevant policies in the plan.

Policy E1-dp: New Development in Coastal Change Management Areas (Policy GSP4 in Reg 19 Version)

Comments Summary

Statutory consultees

Marine Management Organisation: seeking cross reference to East Marine Plan and its policy on climate change and adaptation.

Environment Agency: should allow replacement of dwellings with removable properties.

Broads Authority: suggested use of 'significantly adverse impacts' for consistency & a minor change to supporting text

Waveney District Council (Now East Suffolk Council): Supported policy

Other Consultees

Bourne Leisure: Supported policy

How these comments were taken into account

The policy has been carried forward into the first draft plan. The supporting text has been amended to refer to the East Marine Plan Policy CC1. Temporary replacement dwellings that can be moved could be considered acceptable within CCMA, subject to meeting the other criteria. Criterion for relocation was removed as this is covered in the relocation policy.

Policy E2-dp: Relocation from Coastal Change Management Areas (Policy E2 in Reg 19 Version)

Comments Summary

Statutory consultees

Hemsby Parish Council: Objected; suggested identifying suitable roll-back sites – and that Pontins is an ideal site for this purpose.

Environment Agency: the policy was overly restrictive to development at risk in the next 25 years; it would be extended to all development within CCMA. Existing properties could be let to help fund relocation.

Broads Authority: it was not clear in the policy whether the development is relocated when it is replaced & grammatical changes to supporting text.

Waveney District Council: Supported, it is in broad alignment with Statement of Common Ground with other Norfolk & Suffolk planning and coast management authorities.

Other Consultees

Bourne Leisure: Support.

How these comments were taken into account

The policy has been carried forward into the final draft plan. It has been refined to remove the criterion for 25 years to be affected by costal change. The policy does not seek to identify specific sites to accommodate relocation. The Hemsby Neighbourhood Plan could allocate specific sites for roll-back.

Policy E3-dp: Pollution and Hazards in Development (Policy E6 in Reg 19 Version)

Comments Summary

Statutory consultees

Hemsby Parish Council - A separate policy should govern sites known or suspected to contain materials that could create a risk to public health. This would bring forward the clearing of such sites and prevent owners who become insolvent from leaving an expensive legacy to be resolved by the tax payer.

Environment Agency - More detail was required for applicants/developers. For contamination, a Preliminary Risk Assessment can provide assurance that the risk to the water environment is fully understood and addressed.

Other Consultees

Bourne Leisure – Endorsed this flexible policy, it is consistent with national policy.

How these comments were taken into account

The policy has been carried forward into the final draft plan with amendments to improve its clarity. In terms of risks of contamination, this level of detail is covered sufficiently in national planning policy and guidance. Planning policy alone cannot resolve the situation described by Hemsby Parish Council.

Policy E4-dp: Habitats and Species Impact Avoidance and Mitigation (Policy GSP5 in Reg 19 Version)

Comments Summary

Statutory consultees

Natural England – Supported policy. Suggested that projects not specified in the plan are subject to project HRA.

Environment Agency - Suggested enhancing policy by including measures to avoid net loss of UK BAP priority habitat, protecting standing water bodies from new development and requiring ecological surveys.

Marine Management Organisation – Sought cross reference to East Marine Plan policies on biodiversity.

Broads Authority - Suggested reference to public rights of way

Other Consultees

Norfolk Wildlife Trust – Supported policy but recommends policy wording modified to better deliver biodiversity net gains. Lack of reference to CWS, and the need to protect.

RSPB: suggested reference to 'likely significant effect' rather than 'adverse', project HRA may be required, and that development may be refused where there are impacts.

Persimmon Homes: Objected, did not agree with the fee or its justification, queries if it meets CIL tests and whether the sites still support protected species.

Bourne Leisure: Objected, charge should be viability tested. Queries justification of charge to tourist accommodation. Consistency with “People over wind” case required.

Individual: suggested adopting a policy to protect hedgehogs.

How these comments were taken into account

The Strategy has since been revised to address the changed interpretation of the legislation arising from the “People over Wind/Sweetman” court decision. The recently published guidance and template HRA will help ensure that assessments are submitted at the project level.

It is not considered appropriate to cross reference the Marine Plan as this policy is focussed on recreational impact on terrestrial habitats. The comments from Persimmon do not appear to appreciate that without the Strategy, or something very similar, it would not be possible to permit housing development in the area due to likely significant effects on internationally protected sites. The charge is unrelated to CIL, and largely unaffected by the CIL regulations. Contrary to Bourne Leisure’s understanding, habitats mitigation requirements cannot be conditional on viability. If a development cannot provide any necessary mitigation as a result of viability, it must be refused. The policy has been retained in the final draft plan and further refined to remove to improve clarity. Reference has also been added to project level HRA’s being required.

Policy E5-dp: Protection of Open Spaces (Policy E3 in Reg 19 Version)

Comments Summary

Statutory consultees

Environment Agency - Suggested adding a requirement to retain landscape features where possible to maintain ecological network.

Sport England - Suggested strengthening policy in line with NPPF to require assessment showing the open space is no longer required.

Other Consultees

Norfolk Property Services – Suggested that the policy was overly restrictive in meeting all 3 criteria, 1 should be enough.

How these comments were taken into account

The policy has been carried forward, with amendments to clarify that only one of the criterion has to be met. Additional supporting text has been added to address the Environment Agency’s and Sport England’s suggestions.

Policy E6-dp: Trees and Landscape (Policy E4 in Reg 19 Version)

Comments Summary

Statutory consultees

Broads Authority - Suggested reference to the setting of the Broads and replacing 'landscaping plan' with 'hard and soft landscaping plan' & Suggest referring to Broads landscape documents.

Environment Agency - Suggested specific emphasis on ancient trees and hedgerows, which are likely to be of greater ecological value.

Other Consultees

No Comments

How these comments were taken into account

The setting of the Broads is already explicitly addressed in the policy, and it was not considered necessary to highlight that a landscaping plan can include both hard and soft landscaping. EA's suggestion could be usefully added to the policy. Therefore the policy has been carried forward, with additional reference to ancient trees and hedgerows as well as dark skies.

Policy E7-dp: Flood Risk (Policy E1 in Reg 19 Version)

Comments Summary

Statutory consultees

Hemsby Parish Council: Contractors should be accountable to failures in drainage infrastructure.

Anglian Water - concern that the policy does not include reference to foul and surface water sewerage systems, and the potential risk of flooding from these. Makes a number of recommended considerations for development.

Environment Agency - suggested more detailed comments on more vulnerable development floor level, and requirements for Flood Warning and Evacuation Plans, clarify 'residual flood risk'.

Norfolk County Council Lead Local Flood Authority - suggested expanded definition of higher flood risk areas.

Marine Management Organisation – Sought cross reference to East Marine Plan and its policy on climate change and adaptation.

Other Consultees

No Comments

How these comments were taken into account

The Policy cannot address the specific concerns of Hemsby Parish Council – these are contractual and enforcement matters. Foul water considerations have been addressed in Policy I3. It is not considered appropriate to reference the Marine Plan in this policy as this policy is concerned with managing terrestrial flood risk through the sequential and exception approach.

The policy has been carried forward into the final draft plan with a greater focus on the local operation of the sequential test. The supporting text has made reference to floor levels and emergency plans as per the Environment Agency comments.

Policy E8-dp: Historic Environment and Heritage (Policy E5 in Reg 19 Version)

Comments Summary

Statutory consultees

Norfolk County Council Historic Environment - Broadly agreed with the policy, but stated it should specifically mention archaeological interest and suggests specific wording to achieve this.

Marine Management Organisation – Recommended reference to Marine Plan policy on historic environment.

Historic England - Policies should not replicate national policy. Local Plan offers basis for update of conservation areas and management plans. Recommend local authority has criteria for identifying non designated heritage assets linked to policies. Some policies include provision for archaeology, clear guidance should be in plan wide policies for windfall sites. Historic environment policy supporting text should note heritage at risk. Policies should be strengthened by setting out local distinctiveness. Important to include a design policy which considers the historic environment. Historic environment should be incorporated into other development management policies where relevant. Historic environment can be sensitive to new infrastructure requirements consideration should be given to current and future infrastructure needs. Specific policy recommended on renewables should cover the inclusion of renewable technologies within a conservation area. Policy should limit costs to the historic environment.

Other Consultees

No Comments

How these comments were taken into account

The policy has been carried forward into the final draft local plan with significant amendments to reflect Historic England's concerns. Reference has also been made to archaeology. It is not considered necessary to reference the Marine Plan policy in this instance as the policy only deals with terrestrial matters.

Policy E9-dp: Water Conservation in New Dwellings and Holiday Accommodation (Policy E7 in Reg 19 Version)

Comments Summary

Statutory consultees

Environment Agency – Suggested policy E9 may be an appropriate place to incorporate consideration for foul drainage and wastewater requirements. This section correctly makes reference to the Water Framework Directive, but should go further to make the connection between the need for sewerage infrastructure to be provided and the impact that a lack of provision can have on the deterioration of the status of surface waters and groundwater.

Anglian Water - Anglian Water was supportive of Policy E9-dp. Government research shows the cost of the optional higher water efficiency standard can be as low as £6-9 per dwelling. We therefore consider that this does not make the Local Plan or individual developments unviable.

Other Consultees

No Comments

How these comments were taken into account

The issues raised by the Environment Agency on foul drainage and wastewater requirements have been considered under Policy I3 alongside their other comments. Therefore policy was carried forward into the final draft plan unchanged.

Policy E10-dp: Green Infrastructure (Policy GSP6 in Reg 19 Version)

Comments Summary

Statutory consultees

Norfolk County Council Historic Environment – Welcomed link between Green Infrastructure and Cultural Heritage in the vicinity of the Broads, but equally applicable in the other areas.

Natural England – Supported policy

Environment Agency – Suggested that SuDS be incorporated into policy.

Norfolk Wildlife Trust - Supported this policy, but recommended policy wording modifications to better deliver biodiversity net gains.

Other Consultees

No Comments

How these comments were taken into account

The policy already applies across the whole plan area. Although sustainable drainage systems (SuDS) can, in some circumstances, form part of wider Green Infrastructure provision, the intention of the policy is to improve Green Infrastructure, not SuDS per se. The policy has been carried forward into the final draft plan with additional supporting text making reference to biodiversity net gain and its likely statutory introduction through the Environment Bill.

Policy C1-dp: Community Facilities (Policy C1 in Reg 19 Version)

Comments Summary

Statutory consultees

Broads Authority – noted that the Broads Authority has a similar policy, which also refers to consulting with the community about proposals relating to existing community facilities.

Sport England - Supported Policy, particularly the definitions, which are often omitted. Recommended an extra criterion which allows their loss where they are to be replaced by a facility of equivalent or greater quantity and quality, in an suitable location.

Other Consultees

Theatres Trust - Policy should also cover cultural facilities. Policy should be strengthened as was too permissive. Thorough and robust evidence needed that a facility is no longer needed. Evidence needed that all reasonable attempts have been taken to retain the use.

Flegg Community Land Trust - In addition to affordable housing, community-led development can encompass other community facilities such as shops, pubs, community spaces including workspace and medical facilities. We therefore ask that the Council has a pro-active attitude to supporting and providing assistance to a Community Land Trust or similar body in the acquisition, retention or delivery of community assets for local benefit through policies in the Local Plan.

How these comments were taken into account

The policy has been carried forward with amendments to the supporting text to provide further information on the types of evidence required to comply with the policy.

Policy C2-dp: Educational Facilities (Policy C2 in Reg 19 Version)

Comments Summary

Statutory consultees

No Comments

Other Consultees

Norfolk Property Services - Policy on Educational facilities was welcomed. Where next to development limits whole site area, inc playing fields & hard standings should be constantly included within the development limits. Changes recommend to Plan to include whole schools sites in development boundaries constantly at Oriel High - Bradwell, North Denes Primary - GY, Martham Academy/Nursery, Flegg High Ormiston Academy, Rollesby Primary & Nursery.

How these comments were taken into account

It was not considered necessary or desirable to include schools sites wholly within development boundaries. The policy specifically provides that school development (where this serves the local community) is permissible outside the development limits. Expanding development limits to encompass school sites risks them being lost to housing development. Therefore the policy has been carried forward into the final draft plan unchanged.

Policy I1-dp: Vehicle Parking for Developments (Policy I1 in Reg 19 Version)

Comments Summary

Statutory consultees

Hemsby Parish Council – Permission should be refused where it would lead to an increase in street and pavement parking.

Norfolk County Council Highways – Parking Standards should be contained within an appendix to the plan. Draft policy and justification should reflect latest planning and transport guidance on the provision of parking in new developments.

Other Consultees

Individual - New housing development should have adequate parking to avoid disrupting neighbouring streets by parking their cars in the area of other people's houses.'

How these comments were taken into account

It was agreed that ample parking provision is desirable in itself, but such provision runs counter to many other planning objectives, so a balance needs to be struck. (It is also the case that whatever the provision, there will continue to be inconsiderate drivers and unanticipated situations). Provision of entirely off-street parking is very space hungry (and hence expensive), and has adverse impacts on other desirable characteristics of housing/settlement layouts. It was not considered appropriate to append the NCC Highways Standards in the Plan as these are subject to revision from time to time during the life of the Plan. The policy was subjected to further consultation through the Further Focused Changes Consultation.

Policy I2-dp: Former Railways Trackways (Policy GSP7 in Reg 19 Version)

Comments Summary

Statutory consultees

Hemsby Parish Council – Endorsed Policy.

Norfolk County Council Historic Environment – Endorsed Policy.

Broads Authority – Endorsed Policy.

Sport England – Endorsed Policy.

Other Consultees

No Comments

How these comments were taken into account

Policy has been merged with Gorleston to Lowestoft Cycle Routes policy discussed below.

New Policy I3: Gorleston to Lowestoft Cycle Routes (Within policy GSP7 of Reg 19 Version)

Comments Summary

Statutory consultees

Waveney District Council – Supported policy and looks forward to working with the Borough Council in ensuring the timely delivery of this key link.

Sport England – Supported policy. Should result in greater use, with health, environmental and congestion benefits.

Other Consultees

No Comments

How these comments were taken into account

Policy has been merged with the Former Railways Trackways policy discussed above.

Policies for Places: Settlements and Site Allocations

Comments Summary

Statutory consultees

Hemsby Parish Council – Wished to see growth spread over a number of smaller allocations. Excessive proportion of allocated dwellings are in Hemsby.

Norfolk County Council Minerals & Waste Planning - The draft allocations are all underlain by safeguarded sand and gravel resources.

Other Consultees

RSPB – Had limited concerns regarding the allocated sites, more consideration could be given to the biodiversity benefits that could be designed into schemes from the outset. Recognises that such measures could be stipulated in H11-dp 'Housing Design Principles'.

CPRE Norfolk – Considered the allocation to Primary Villages to be disproportionate.

Norfolk Property Services – Norfolk County Council have landowning interests in Borough. Need for further allocations, rather than over-reliance on windfall, in all levels within the settlement hierarchy. Suggested its sites for allocation, recognising that further information on these may need to be developed.

Pembroke Builders – Are local builders who have developed a number of small projects in the area over last 15 years. Objected to restricted number of small allocations. Continued to promote a number of small sites. A flexible approach to village boundaries, or more generous boundaries, is proposed.

Persimmon Homes– The Plan should seek to deliver the housing target identified in the Core Strategy or, as a minimum, 6069 dwellings. This should include the site at Nova Scotia Farm, Caister. Disagreed it is up to the Council to decide which settlements in each tier of the hierarchy should be allocated growth, and that a gross imbalance within a tier is acceptable.

Durrants – Referred to research on build rates. Planned housing trajectories should be realistic. Policies in Plans should allow for a good mix of sites. Recognised the 15% buffer provided by the draft allocations, but was concerned as to whether there is sufficient flexibility to meet the targets, and too much reliance on a limited number of sites. Only one site in the top tier of settlement hierarchy. Does not consider this represents a 'plan led strategy'.

Individual - 'The proposed allocations are preferential to larger units at the expense of the more urgent need of smaller units, the distribution fails to recognise existing usage of essential services. Older areas of occupation are not taken into account in terms of compatibility. Promoted an additional site in Bradwell.

2 Individuals - Runham allocated site is no longer required. Individual – While chosen locations for development are a sustainable approach, there is a distinct reliance on large strategic allocations. The Plan should include provision of at least 10% of the requirement in the form of small and medium sites, and a buffer over the minimum requirement. (n.b. – see also representations on Policy UCS3 – Reduction of Core Strategy Housing Target).

How these comments were taken into account

It was agreed with, in light of comments received, that additional housing allocations were required to reduce reliance on a limited number of these, to provide choice and competition, and to provide a greater buffer for 'flexibility'. However it was not agreed that there is a substantial shortage of smaller sites. While most of the allocations are large, very many of the existing, as yet unimplemented, permissions are for smaller sites, and small sites also predominate in the anticipated future windfall permissions.

It was also not agreed with that the draft allocations to Primary Villages are disproportionate: taken together with permitted and anticipated windfall development they provide almost exactly the proportion of total development planned by the Core Strategy. Neither is the Hemsby allocation considered disproportionate: the distribution of allocated development takes into account the distribution of existing permissions and anticipated windfall development. It is accepted that more could be done in relation to biodiversity, and

considered this is best achieved through amendments to generic policies in the plan and where necessary to site specific policies.

Great Yarmouth

Comments Summary

Statutory consultees

Hemsby PC – No provision has been made for increased traffic northbound past the Town Hall and at the Fullers Hill Roundabout, or to reduce that traffic.

Other Consultees

No Comments

How these comments were taken into account

The Fullers Hill roundabout was recently given a major upgrade in order to increase its capacity. The planned Third River Crossing is anticipated to result in a major reduction in traffic, particularly heavy vehicles, from the port area passing the Town Hall and town centre more generally. The Hall Quay planning brief envisages a reconfiguration of the roadways, pavements and landscaping in order to create a more pedestrian friendly environment and take advantage of the anticipated reduction in traffic resulting from the completion of the Third River Crossing.

Policy GY1-dp: Great Yarmouth Town Centre Area (Policy GY1 in Reg 19 Version)

Comments Summary

Statutory consultees

Hemsby Parish Council – Broadly supported policy, though further reduction in retail frontage considered necessary for town centre vitality. Increasing traffic flow via Fullers Hill roundabout appears contrary to the plan seeking to reduce traffic in that area.

Norfolk County Council Historic Environment – Below-ground archaeological potential of Town Centre should be highlighted in Policy.

Other Consultees

Theatres Trust – Supported policy intention to promote community and cultural based uses, particularly given the rapid shift in demand and need within the retail sector.

Ellandi (Retail Mall Operator) – Were generally supportive of policy aspiration, i.e. realistic, flexible approach to development uses within the town centre. Concerns that focused Primary Shopping Area (PSA) not defined around main retail circuit. i.e. reliance upon Town Centre Boundary may lead to new town centre development granted away from main retail core without regard to existing, committed and planned investment. No need to include Hall Quay and The Conge within Town Centre Boundary where allocated in an up to date plan.

Individual – Consider reinstating road around Market Place to improve town centre vitality. Better environmental improvements and flexible uses for vacant units, i.e. pop up shops.

How these comments were taken into account

The policy has been carried forward into the final draft plan and revised to make reference to a Primary Shopping Area which will help address concerns raised by Ellandi.

Policy GY2-dp: Market Gates Shopping Centre (Policy GY2 in Reg 19 Version)*Comments Summary*

Statutory consultees

No Comments

Other Consultees

Ellandi (Retail Mall Operator) – Broadly support inclusion of allocation, but suggests it includes whole of Market Gates (including car park) to provide flexible framework for future development opportunities. This would correspond with Council's decision not to include Market Gates within the Protected Retail Frontage (which allows for a variety of main town centre uses to come forward).

How these comments were taken into account

The policy was subject to further consultation as part of the Further Focused Changes Consultation. The policy has been carried forward into the final draft plan. The site is now being treated as a detailed policy designation rather than an allocation policy. It has been amended to:

- include the entire Market Gates Shopping Centre;
- seek to maintain core retail (A1) which front the principal entrance and central shopping corridors; and
- allow greater flexibility for other uses (retail, leisure etc) in the remaining areas of the shopping centre.

Policy GY3-dp: Hall Quay Development Area (Policy GY3 in Reg 19 Version)*Comments Summary*

Statutory consultees

Hemsby Parish Council – In conflict with anticipated traffic increases resulting from Third River Crossing and traffic bound for Fullers Hill.

Norfolk County Council Historic Environment – Agreed with Policy.

Other Consultees

County Cllr Mick Castle, Norfolk County Council – Supported encouragement of new hotel, restaurant, bar uses in Hall Quay, close to town/heritage centre and bus/rail stations. Suggested Reconfiguration of on-street parking to support new hospitality uses.

Rt Hon Brandon Lewis, MP – Supported the Policy approach.

Ellandi (Retail Mall Operator) – Supported the policy in principle, but should seek to improve linkages with the rest of the town centre to strengthen the overall offer. Refinement of proposals through a Supplementary Planning Document welcomed.

How these comments were taken into account

A supplementary planning document elaborating the content of this policy was be subject to public consultation and adopted in July 2019.

The policy has been carried forward into the final draft plan with some minor clarifications.

Policy GY4-dp Conge Development Area (Policy Removed from Reg 19 Version)

Comments Summary

Statutory consultees

Norfolk County Council – Minerals and Waste Planning – Site is partially underlain by safeguarded sand and gravel. Recommended additional wording for the Policy.

Other Consultees

Rt Hon Brandon Lewis, MP - Supported the proposals intended to retain and encourage employment generation within the town; particularly the proposals to re-develop The Conge.

County Cllr. Mick Castle - New mixed Retail/Residential development here would represent a major boost for Yarmouth's town centre. Such a development of 400 dwellings (together with any on North Quay) would need a serious attention to parking policy to protect the "quality of life" of existing and new town centre residents, and provide an attractive offer for shoppers and hospitality.

Norfolk County Council - The County Council strongly supported the proposed redevelopment around the Conge as set out in Policy GY4-dp, which includes the provision of up to 400 dwellings. Sought clarification in supporting text of how this figure fits into the overall housing requirement as set out in paragraph 4.1.1. of the Local Plan, the site's status and whether it counts as a new allocation or part of any remaining strategic allocation from the Core Strategy. If treated as a new allocation this could potentially reduce the windfall allowance and avoid some of the concerns about the scale of this.

Persimmon Homes - Objected to the inclusion of this site on grounds it is highly unlikely to be delivered in the Plan period. It is in multiple ownership and although numerous of the properties appear to be unoccupied other occupants will need to be found alternative premises. Given this major problem and viability issues we do not believe that this site can be relied upon for delivery.

Ellandi (Retail mall operator) – Agreed in principle the identification of a series of additional locations within the Town Centre boundary (as amended) to reflect the redevelopment ambitions and opportunities identified in the Town Centre Masterplan, including the Conge. The relevant policies should require major proposals for main town centre uses in these locations to improve linkages with the rest of the town centre with a view to strengthening the Centre's existing offer as opposed to displacing / diluting / undermining it. Welcomed the suggestion that Supplementary Planning Document will be prepared in respect of The Conge to refine proposals in these locations to guide the process of implementation.

How these comments were taken into account

The policy has not been carried forward into the final draft plan due to confusion about the housing provision from the site and how it corresponded to the Core Strategy. Given that the Core Strategy provides sufficient guidance for this area and that the draft policy repeated much of what is already stated in the Core Strategy a further policy in the part 2 plan was not considered necessary.

Policy GY5-dp: King Street / Regent Street Development Area (Policy GY4 in Reg 19 Version)

Comments Summary

Statutory consultees

Norfolk County Council Minerals & Waste – Allocation policy should make reference to Mineral Safeguarding Area for sand and gravel and in the event that the site area is amended in the future to be over 1 hectare, Norfolk Minerals & Waste Core Strategy Policy CS16 will apply.

Other Consultees

Ellandi (Retail Mall Operator) – Supported Policy in principal though in respect to encouraging main town centre uses, the Policy should seek to improve linkages with the rest of the town centre to strengthen the overall offer. Suggestion of refining proposals through a Supplementary Planning Document is welcomed.

How these comments were taken into account

The intended supplementary planning document for this area was not being carried forward, in the absence of a potential cinema operator and other projects taking precedence. Therefore, this policy has not been carried forward. The option of not proceeding with the policy was put to further consultation in the Further Focused Changes consultation.

Policy GY6-dp Car Parking in the Town Centre (Policy Removed from Reg 19 Version)

Comments Summary

Statutory consultees

Hemsby Parish Council - In the absence of a car parking policy applicable to Hemsby, this policy should be of a generic form covering all areas.

Other Consultees

County Cllr. Mick Castle - There is a very good supply of parking spaces in the Town Centre but there is a need for County and Borough Councils to co-ordinate parking policy to both help promote the town centre and also to protect the "quality of life" of town centre residents, where car ownership is low but those with cars find it virtually impossible to secure parking close to their homes. Current Town Centre Partnership and GYBC schemes promoting One Hour free parking could easily be enshrined in a "One Hour Free/Pay to Stay" parking regime using Parking Ticket Machines and Smart Phone payments - involving both GYBC car parks and NCC on-street. The introduction of permit parking for residents and businesses in the town centre area would then secure parking for local people - and importantly help with the introduction of 400 new residential dwellings in The Conge and further afield in North Quay area.

How these comments were taken into account

The issues relating to car parking in the town centre are not the same as all parts of the Borough, and this policy is aimed at the former only. Hemsby Parish Council are preparing a neighbourhood plan, and could include a policy on car parking in that area.

The policy does not determine the specific charging regimes for car parking, but identifies general objectives/considerations for parking provision similar to those identified by County Cllr. Castle. For conciseness and presentation reasons, the policy has been merged with the Great Yarmouth Town Centre Policy.

Policy GY7:dp: Great Yarmouth Seafront Area (Policy GY6 in Reg 19 Version)

Comments Summary

Statutory consultees

Hemsby Parish Council – Broadly supported policy, but much of this should apply to other areas such as Hemsby.

Broads Authority – Disagreed with the use of ‘etc.’ (presumably due to potential ambiguity).

Norfolk County Council Historic Environment – Agreed with the policy.

Marine Management Organisation – Listed related MMO East Plan Policies.

Other Consultees

Rt Hon Brandon Lewis, MP - When considering economic development, I am also pleased to note the ongoing ambition to find ways to restore many of the historic facilities within the “Golden Mile” such as the Winter Gardens. These historical assets, if properly managed on a sustainable footing, could act as a significant pull factors for tourists and local visitors, and I fully support efforts to revitalise and support these facilities.

County Cllr. Mick Castle – Agreed with policy. Seeks common approach between NCC and GYBC to parking charges. The latter higher charges, and evening/overnight charges are not as good for the night time economy etc. Wishes to see former Empire Cinema included in list of seafront attractions requiring refurbishment/new uses.

Historic England – Concerned that as written it did not give sufficient protection to non-designated heritage assets.

Theatres Trust - Welcomed that the policy seeks to sustain and strengthen the seafront area through a number of measures including the encouragement of cinemas and theatres. Finds the layout of the policy (repetition of the headings) confusing.

Ellandi (Retail Mall Operator) – Understands the rationale for encouraging food and drink and retail uses in this area, but policy was unclear how this would affect the intention to concentrate such uses in the town centre. A balance needs to be struck.

Bourne Leisure - Recognised the policy is a replacement for the former Prime Holiday Accommodation Area. Bourne Leisure’s Seashore Holiday Park is located within this area, and it supports the principle of draft Policy GY7-dp encouraging development which will strengthen the area as a tourism destination. Suggested addition "to encourage investment in major existing and new facilities" to support Bourne Leisure in investing in its holiday parks to ensure it can offer high quality accommodation and facilities which meet the ever-changing needs of its guests. Policy GY7-dp would then be consistent with the NPPF.is approach, in identifying and encouraging tourism development within the Great Yarmouth seafront area.

How these comments were taken into account

Hemsby Parish Council's concerns have been addressed through the Holiday Accommodation Areas Policy L1 which covers parts of Hemsby. Should the parish council wish for additional policies, this could be addressed in the neighbourhood plan the parish council is preparing.

The policy has been carried forward into the final draft plan. County Cllr. Castle's suggestion of the Empire Cinema is reflected in the flexible uses in the policy. This policy cannot directly address car parking charges, but provision of adequate parking is already included in the policy. Historic England's concern about undesignated heritage assets was accepted, but it was considered this can best be addressed by slightly different rewording to that it suggested. Similarly, Bourne Leisure's suggestion is accepted in principle, but can best be addressed through slightly different wording. The relationship to town centre policies for retail and food and drink uses, of concern to Ellandi has been clarified in the supporting text. The policy has also been rewritten to ensure it is clearer in its intention.

Policy GY8-dp: Great Yarmouth Back of Seafront Improvement Area (Policy GY7 in Reg 19 Version)

*Comments Summary***Statutory consultees**

Hemsby Parish Council – Much of this should also apply to Hemsby.

Other Consultees

Rt Hon Brandon Lewis, MP - stated it is quite right and proper than the Borough Council resists further expansion of HMOs in the area described as the "back of the Seafront area."

How these comments were taken into account

Hemsby Parish Council's concerns are in part addressed by the relevant provisions in the Holiday Accommodation Areas Policy L1 which covers parts of Hemsby. Should Hemsby Parish Council wish for additional policies, these could be addressed in the neighbourhood plan the parish council is preparing. The policy has been carried forward into the final draft Local Plan.

Policy GY9-dp: Great Yarmouth Regent Road (Policy GY5 in Reg 19 Version)

*Comments Summary***Statutory consultees**

Norfolk County Council Historic Environment – Supported Policy approach.

Other Consultees

Ellandi (Retail Mall Operator) – Unclear how food, drink & hospitality uses in these areas will be treated vis-a-vis concentrating town centre uses. Appropriate balance required to ensure that retail etc. uses along seafront do not undermine the vitality and viability of the Town Centre.

How these comments were taken into account

The policy has been carried forward, with added text to supporting text to clarify how the 'sequential test' will be approached for this area as well as tweaking appropriate uses within this area.

Policy GY10-dp Great Yarmouth Racecourse (Policy GY8 in Reg 19 Version)

Comments Summary

Statutory consultees

Sport England - supported a policy to protect this sports facility, which also plays an important economic role in the local area.

Other Consultees

No Comments

How these comments were taken into account

Supported by Sports England, therefore the Policy has been carried forward in the final draft plan.

Policy GY11-dp: North Denes Airfield (Policy GY9 in Reg 19 Version)

Comments Summary

Statutory consultees

Hemsby Parish Council - Broadly supported was given to this policy, but the Parish Council recognises and expects Hemsby to be afforded the same protection for its leisure areas, namely the former Pontins site.

Other Consultees

County Cllr Mick Castle - Understood the “sentiment” of the policy but doubts a helicopter service based in great Yarmouth would be viable again. However, designation for major infrastructure/potentially anti-social industrial uses should firmly remain and as such sites are scarce.

RSPB – Requested the inclusion of a statement recognising need to ensure that flight lines are sensitive to the locations of nearby little tern colonies and designated wildlife sites.

Individual - Supported the policy. With the variety of offshore structures in the southern North Sea both gas based and now increasingly with wind power, together with the proximity of the continent, this facility at the North Denes could be of immense value in the future to the port and to businesses who might be encouraged to relocate in the town.

How these comments were taken into account

Given the strategic value of the renewed heliport use, and the difficulty of demonstrating this can actually be achieved. It is considered that renewed aeronautical use of the site is so potentially valuable to a key and growing sector in the local economy, namely offshore energy, that this strategic policy should be maintained, unless it can be positively shown that this could not be achieved in the future. RSPB’s concerns regarding the sensitivities of nearby little tern colonies are noted, but the policy is not proposing any change from the established use of the site. Therefore the policy has been carried forward.

Policy GY12-dp: Great Yarmouth Port and Harbour (Policy GY10 in Reg 19 Version)

Comments Summary

Statutory consultees

Marine Management Organisation - Proposals should demonstrate, in order of preference: that they will not interfere with current activity and future opportunity for expansion of ports and harbours; how, if the proposal may interfere with current activity and future opportunities for expansion, they will minimise this; how, if the interference cannot be minimised, it will be mitigated; the case for proceeding if it is not possible to minimise or mitigate the interference. Proposals that will help the East Marine Plan area to contribute to offshore wind energy generation should be supported.

Norfolk County Council Transport - The policy should address the need to consider and manage the traffic impacts of the Port activity on the sea front and other tourist areas.

Other Consultees

Great Yarmouth Port Authority - Noted with regret that Saved Policy EMP26 (future rail link to the port) is not proposed to be carried forward in the Draft Policy GY12, and wishes to see this done. It remains a Port Authority aspiration to achieve a future rail link to the Port. The feasibility of a future rail link may be enhanced when the Third River Crossing is built.

How these comments were taken into account

It is not considered appropriate to add to the policy a longer term aspiration to achieve a future rail link to the port given the unlikelihood of this being achievable.

The Policy is considered robust enough to not require amending as proposed by the MMO. The policy has been carried forward into the final draft plan. The supporting text has been amended to make reference to traffic impacts.

Policy GY13-dp: Town Quay / Haven Bridge Area Visitor Mooring Facilities (Policy Removed in Reg 19 Version and merged with GY3)

Comments Summary

Statutory consultees

Broads Authority – Noted that the BA Yacht Station provides overnight stopping facilities for boaters close to the station.

Other Consultees

Individual - The problems of such a policy with regard to mooring facilities are set out and this is a matter for the statutory Port Authority. It may be that an imaginative solution the town could be adopted but not in the area suggested under this policy for the operational difficulties as set out.

How these comments were taken into account

The Broads Authority's Yacht Station is a valuable facility, but is not accessible for taller vessels, including those with fixed masts, and neither does it have the direct relationship with the Hall Quay. (It is also seasonal.) As with many of the Plan's proposals, the engagement and support of other bodies and owners is necessary to bring a proposal to fruition. The possible mooring problems referred to were not set out in the representation. No representation was received on this matter by the Port Authority itself. It is not clear that there are any fundamental problems with mooring in this

location as the Town Quay is already designated for this purpose, but as currently configured is difficult and unappealing to most pleasure craft.
This policy has been absorbed by the Hall Quay policy for conciseness.

Site Selection Summaries (Great Yarmouth)

Comments Summary

Statutory consultees

Norfolk County Council Lead Local Flood Authority - Site 41 (Policy GY-2dp): The site is wholly within the Great Yarmouth critical drainage catchment and is on the edge of Flood Zone 2 (western side of the site). There is a flow path of surface water crossing the site on the eastern side (shown on the RoSWF mapping). No watercourse is apparent (in relation to SuDS hierarchy if infiltration is not possible).

Other Consultees

Individual - Site CS17 immediately downstream of the Haven Bridge on the west bank of the river comprises quayside and support land in port operational use. This area should not be considered for housing development unless the port operational need is no longer present. Such areas of land close to the quay have been vital in enabling the port authority to attract new users to the town in the past and this area of land has been one such site. Seagull Garage – Agreed with assessment of unallocated site Ref. No. 12 (which said site within development boundary, and best dealt with through planning application).

MPDC Ltd. – Unallocated site Ref. No. 389, development is underway.

Individual – Comments that unallocated site submitted Ref. No. 22 will be subject of a planning application when flood risk assessment completed.

How these comments were taken into account

The Lead Local Food Authority's comment relates to Policy GY2-dp, which was considered previously in the document.

Policy CS17 was unaffected by the Draft Local Plan Part 2. The relationship of CS17 to port operations was considered in the Core Strategy Examination and addressed in a specific provision in that policy.

Gorleston

Comments Summary

Statutory consultees

Hemsby PC – Comments that while this section indicates GY has little remaining room for development, there are around 1,000 allotments. These could provide land for around 2,000 homes if they were replaced over time by alternative allotment sites in nearby agricultural areas.

Other Consultees

County Cllr Mick Castle – Broadly agreed with the split of new housing development, but considered there is potential for more housing at Southtown, Cobholm, Pasteur Road, etc., if done in conjunction with improvement to flood defences.

How these comments were taken into account

It was considered desirable to provide additional housing development for the Main Towns by allocating a southward extension of Gorleston at Links Road and also further land at Emerald Park. It would be difficult to accommodate very significant housing development in Southtown and Cobholm during the remainder of this plan period in a way which is consistent with national policy on flood risk, because the extent of flood protection works required to accommodate this is unlikely to be achieved in the remaining timescale, in the light of funding constraints and other flood risk priorities. There may be potential in the longer term.

Gorleston Overview*Comments Summary*

Statutory consultees

No Comments

Other Consultees

Individual – Much land along the west bank of the river is at a higher risk of flooding and this must be taken into account when considering development. The flood walls are at risk of being overtopped (quayside) or outflanked (Darby's Hard/Icehouse). Possible conflicts with port operations. Non-habitable ground floors not a satisfactory solution as this raises overall height (e.g. unoccupied tower flats totally out of scale in this part of Gorleston).

How these comments were taken into account

Flood risk is acknowledged to be a key consideration in the area.

Policy GN1-dp: Gorleston Town Centre (Policy R3 in Reg 19 Version)*Comments Summary*

No Comments received.

How these comments were taken into account

The policy has been carried forward into the final draft plan.

Policy GN2-dp: James Paget Hospital (Policy Removed from Reg 19 Version)*Comments Summary*

Statutory consultees

No comments

Other Consultees

James Paget Hospital – Welcomed the policy, and dialogue with the Council about the hospital's development and estates strategy.

How these comments were taken into account

Policy was welcomed, however following further consideration, the policy as drafted did not add any extra detail to the existing policy (CS15) therefore the policy has been removed.

Policy GN3-dp - Hospital Aircraft Landing Area (Policy Removed from Reg 19 Version)

Comments Summary

In discussions with the Hospital it has emerged that the Hospital now require only part of the previously indicated area to be reserved for aircraft operations.

How these comments were taken into account

Following further discussions with the hospital, the area required is now no longer needed, therefore policy PDP5 was consulted upon in the Further Focused Changes Consultation to remove the policy GN4 Hospital Aircraft Landing Area. The policy has therefore not been included in the final draft plan.

Policy GN4-dp: Beacon Park Business Park (Policy GN4 in Reg 19 Version)

Comments Summary

No Comments received.

How these comments were taken into account

The policy has been carried forward into the final draft plan.

Policy GN5-dp: Beacon Park Business Park Extension (Policy GN5 in Reg 19 Version)

Comments Summary

Statutory consultees

Norfolk County Council Landscape – Noted that the site is close to Bradwell Bridleway BR16 and Bradwell Footpath FP20, impacts of increased footfall on these routes should be considered and NCC Green Infrastructure officers consulted.

NCC - Minerals And Waste: Noted that the site is entirely underlain by safeguarded Sand & Gravel and ought to insert text into policy referencing Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding'.

Other Consultees

Rt Hon Brandon Lewis, MP: Was supportive of policy.

How these comments were taken into account

The policy has been carried forward into the final draft plan. The policy has been amended to make reference to the need to assess quantity and quality of mineral resource and the possibility for prior extraction.

Gorleston Housing Allocations

Comments Summary

Statutory consultees

No comments received

Other Consultees

Pleasure & Leisure Corporation – Sought the allocation of site at Emerald Park, Gorleston for development of 100 dwellings. (Corrects number of dwellings referred to in text.)

How these comments were taken into account

The combination of the desirability of allocating additional sites together with the clarification of proposals and considerations through the planning application for the site means that it is now considered appropriate to allocate this site. The site is allocated in the final draft plan under Policy GN2.

Policy GN6-dp – Land at Ferryside, High Road Gorleston (Policy GN3 in Reg 19 Version)

Comments Summary

Statutory consultees

Environment Agency - The site is within Compartment C, which is where we will continue to raise our flood defences in line with Climate Change in Great Yarmouth. This development will therefore be defended from actual flood risk for the duration of its lifetime.

Historic England – House on site is not listed but of local heritage interest, and this has not been addressed in the assessment of the site. Information promoting the site does not set out context of site to support scheme sympathetic area. These issues should be addressed.

Norfolk County Council - Historic Environment – Replace 'Norfolk Historical Environmental Service' with 'Norfolk County Council Environment Service'; add the word 'Archaeological' in front of 'Written Scheme of Investigation' for clarity

NCC Minerals & Waste Planning – Site is entirely underlain by safeguarded Sand & Gravel. (Not of significance if the site remains under 1ha.)

Other Consultees

Individual – Scheme is over-intensive use of area. Demolition of the existing building is not popular locally. Questioned why ownership has not reverted to the Borough Council. Traffic/parking assessment required in light of narrow roads in vicinity. Significant trees on the site. Archaeological assessment required.

How these comments were taken into account

The allocation has been retained, with amended wording regarding heritage, archaeology, minerals & waste. The title was clarified as is not on Ferryside Road the allocation is off High Road in Gorleston. In light of a planning application being refused, there were further amendments made to the allocation to add reference to, retaining the protected trees and reducing the density on site from 35 to 20.

Site Selection Summaries (Gorleston)

Comments Summary

Statutory consultees

Norfolk County Council (NCC) Lead Local Flood Authority - Site 222 (Draft Allocation GN5-dp,

Ferryside House) is a brownfield site. It is in FZ1 (strategic) There is mapped surface water flooding in the road adjacent to the site but only in the 0.1% event. It is not in the Critical Drainage Catchment, site is only served by combined sewers.

Other Consultees

Norfolk County Council (as landowner) & NPS Property Consultants – Objected to the non-allocation of site 33 (S of Links Rd.); This is a main town where over one third of plan provision has been identified. Gorleston is most suitable for additional allocation. Would maintain a strategic gap between Gorleston and Hopton (as identified in policy G2-d). The site is in a sustainable location in terms of its proximity to a range of services; contiguous to existing development; within walking distance of public transport connections; has easy access to the A47; and early investigations suggest an access off Links Road could be provided with no detriment to the wider highway network; could be readily connected to nearby utilities infrastructure; is within single ownership with no obviously identifiable development constraints to render this undeliverable within the Plan period; and could be delivered in a phased manner. Site 422 (W of A47, and S of Beaufort Way) relates well to Beacon Park and is capable of integration into the area as there is development at Beacon Park to the north, hospice development to the west and the A47 (former A12) to the east.

Badger Building – Site 223 (land N of Beccles Rd.) is underway.

2 Individuals - Pleased to see that site 348, the site of the Koolunga Gardens, is not allocated for development.

How these comments were taken into account

Flood risk status of the allocation GN5-dp was noted.

Site 422 was not considered an appropriate for allocation.

Land South of Links Road is allocated in the final draft plan. This was consulted on as part of the Further Focused Changes.

The trees at and around Koolunga House are protected by tree preservation orders and by virtue of being in a Conservation Area. While this has not prevented some of the trees being harmed by criminal activity, these are the only protections available under the Planning Acts.

Key Service Centres

Comments Summary

Statutory consultees

No Comments received

Other Consultees

Persimmon – Noted only 16% of the development planned for Key Service Centres is proposed for Caister. Accepted that Core Strategy does not imply that any split of development should be equal between Bradwell and Caister, neither does it imply there should be gross disparity. No reason there should not be similar numbers to Bradwell, other

than Council's apparent hostility to development in Caister. Did not agree that Caister is constrained. Available site to the west of Caister is sustainable and deliverable.

How these comments were taken into account

Based on the need to increase housing provision in the plan to ensure flexibility and certainty of supply, the site referenced by Perssimon has been included in the plan as Policy CA1.

Policy BL1-dp: Beacon Park District Centre

Comments Summary

No Comments received.

How these comments were taken into account

The policy was re-consulted on with some change during the Further Focused Changes consultation.

Primary Villages

Comments Summary

Statutory consultees

Anglian Water – Noted housing allocations in Belton, Hemsby, Ormesby St. Margaret & Runham. Consideration should be given to criteria relating to water recycling infrastructure, including Anglian Water's assets, where relevant.

Other Consultees

CPRE Norfolk – The number of new allocations were too high and disproportionate to those settlements higher up the hierarchy. In particular, the draft allocations for Ormesby St. Margaret are disproportionate for a Primary Village.

Persimmon – Objected to distribution of growth across the Primary Villages, and in particular draft allocations at Belton (BN1-dp, 100 dwellings), Hemsby (HY1-pdp, 190 dwellings) and Ormesby (OT1-dp, 190) dwellings, on grounds that these have fewer facilities and will be more car dependent than the site it is promoting west of Caister. Persimmon delivers significant number and proportion of dwellings in Borough, on sites at Bradwell, Caister and Martham, but its sites will run out in 2021/22 if the Draft Plan is not amended.

How these comments were taken into account

The adopted Core Strategy determined that the Primary Villages would, together, accommodate a similar proportion – around 30% - of the total housing growth as the Key Service Centres. The allocations were intended to provide the most sustainable and deliverable combination available, consistent with the Core Strategy, and do not seek to favour or disfavour any particular developer.

BN1-dp Belton Housing Allocation

Comments Summary

Statutory consultees

Environment Agency – Agreed with allocations. Had no concerns related to it.

Anglian Water – Noted housing allocation in Belton. Consideration should be given to criteria relating to water recycling infrastructure, including Anglian Water's assets, if relevant.

NCC Minerals and Waste Planning – Site is within Minerals Safeguarding Area (Sand and Gravel) and development of it will need to address the requirements of NMWCS Policy CS16.

Norfolk County Council Historic Environment – Change 'Historical Environmental Records' to 'Heritage Assets with Archaeological Interest', and 'Heritage Asset Statement' to 'Heritage Statement accompanied by the results of an Archaeological Field Evaluation'.

Norfolk County Council Landscape – Agreed with policy. Supported the retention of important boundary vegetation around the site. Noted that there is an adjacent pond/reservoir to the south, where appropriate surveys will be required.

Norfolk County Council Highways – Supporting text should, for clarity, refer to a normal roundabout, not mini-roundabout.

Norfolk County Council Lead Local Flood Authority – Watercourse not apparent (in relation to SUDS if infiltration not possible). Potential overland flow path through site.

Other Consultees

Site Owner – Supported allocation. Site is generally unconstrained, services are available, highway access can be achieved, development is compatible with neighbouring uses, and will deliver the required 10% of affordable housing.

Individuals – Objected to development on grounds of loss of open space, expands village too much, sewerage and water supply problems, overlooking, etc.

How these comments were taken into account

The allocation is considered appropriate in scale and location. The various recommendation of the statutory consultees were accepted.

Reference was also made in the policy to contribute towards two footpath connections. The criteria to 'avoid motor traffic between New Road and Church Road' was removed and clarified to avoid direction vehicular connections onto Church Road.

The policy has been taken forward but by revising policy wording as suggested above.

Site Selection Summaries (Belton)

Comments Summary

Statutory consultees

No Comments

Other Consultees

Site Promoters – Objected to non-allocation of their sites, on grounds, variously, of site is in a village settlement; disagree access is constrained (only a small development); site falls just outside parish development area; site adjoins nearby residential development; access to site can be achieved; there is currently no similar scheme (wardened elderly accommodation) within village, and it would enable residents to retain independent living; small developments such as this are the way forward for the future; former poultry farm is run down and site has great potential; have now resolved satisfactory means of access; Site Promoter – New site was submitted.

How these comments were taken into account

None of the arguments, nor additional information and site, are considered to change the view that the single allocation was the most suitable choice in all the circumstances as evidenced in the Sustainability Appraisal Report.

Hemsby (incl Overview)

Comments Summary

Statutory consultees

Hemsby Parish Council – Tourism economy of Hemsby is c£80M, and it is 11th most popular holiday destination. Area is dependent on it, and has few other sources of jobs. This is not recognised by plan text, which appears to accept contraction is inevitable. Former Pontins site should be retained as 'Holiday Area'

Other Consultees

Cllr Bensly – The response of GYBC to the recent weather events was magnificent. The threat of closing the toilets at the bottom of Beach Road unbelievable. If it were not for local residents and businesses the toilets what is a human right would be closed. Can you imagine the impact on our community and tourism industry. Local people see all the investment in tourism going elsewhere in the Borough (e.g. free parking, beach huts, splash pool at Gorleston) and not Hemsby. Council seems more concerned with stripping Hemsby of its only asset, tourism, not encouraging it. I have to wonder why. Hemsby/Newport has more holiday beds that feed the Borough/Norfolk and this plan wants to actively take that away. This is a wonderful village/holiday destination that has to be safeguarded with a balanced and sensible approach. I don't believe the plan is that. I would like to see a policy, similar to that for Great Yarmouth and Gorleston, not allowing any more hot food establishments on Beach Road (or in Winterton) that cause traffic issues. We have more than enough food establishments. I would like to see more encouragement for independent shops and a more interesting experience in these areas.

Cllr. Galer – Objected on grounds it did not represent best interests of his constituents; ‘Overview’ not accurate re economy; £80M contribution of tourism economy should be recognised; does not adequately describe threat from the sea; there are no plans to protect or develop the local economy and jobs; Hemsby has not opposed housing development and more affordable housing would be welcomed; status of tourism industry has been misrepresented and deserves more robust planning and support.

Individual – Burial ground (apparently a request for more burial ground space).

Individual – Hemsby desperately needs a series of permissive paths around the village, for amenity, accessing services, children’s safety, etc. new developments should facilitate this. Developments which reduce connectivity, depend unnecessarily on car use, or reduce pedestrian and cyclist safety should be resisted. A new footpath policy for Hemsby should be produced and incorporated into the plan. There are serious problems of inadequate car parking, the bus needing to make a three point turn, and congestion etc. at the bus stand, affecting safety, air quality, noise, and the appearance of the place for residents and visitors.

How these comments were taken into account

The investments in Gorleston and elsewhere referred to by Cllr. Bensly were made separately to the local plan process, and there are other forums for the distribution of such investment to be addressed.

It was accepted that the supporting text could be more positive in relation to the vibrancy and importance of the tourism economy and jobs in Hemsby. It was not agreed, however, that these are the only considerations, or that the loss of the Pontins site to tourism use is something that the Council can easily remedy, in all the circumstances. The provision of additional burial space, and preparation of a footpath plan for Hemsby, are things the Council would no doubt wish to support, but no specific proposals or parameters have been provided which would enable this to be addressed through this Plan. Policies relating to hot food establishments are more complex than may first appear. These are all matters that could potentially be incorporated in the neighbourhood plan currently in preparation for Hemsby should the Parish Council wish to carry these forward.

Likewise with measures to address the parking and bus turning/standing issues are things the Council would wish to support, though this is also being considered in relation to Pontins site allocation (see below).

HY1-dp Former Pontins Site

Comments Summary

Statutory consultees

Hemsby Parish Council – Proposal to allocate the site will not encourage and support visitor accommodation: it will permanently remove it. There is as yet no objective and convincing evidence the tourism use is not viable, as required by Policy CS8. That the site has not been used for tourism for a few years should not be a reason to allocate it for another use. (Contrasts with the approach to North Denes Airfield). Plan should incorporate a positive vision for the future of tourism in Hemsby. Housing should be accommodated across a number of alternative sites that have been put forward. The PC is of the firm opinion the Pontins site should retain designation as ‘Holiday Area’ to accommodate future tourism growth and ‘roll-back’ resulting from climate change.

Environment Agency – Agreed with policy. Had no concerns about allocation policy HY1.

Norfolk County Council Minerals And Waste Planning – Site is within Minerals (sand and gravel) Safeguarding Area, and future development should address the requirements of the Minerals Policy CS16.

Norfolk County Council Historic Environment – Suggested requirement for Archaeological Written Scheme of Investigation.

Norfolk County Council Landscape – Supported the retention of significant trees within the site.

Norfolk County Council Lead Local Flood Authority – Site is wholly within Hemsby Critical Drainage Catchment. Watercourse not apparent (in relation to SUDS hierarchy) if filtration is not possible). Ponding associated with RoFSW map on site. Eight confirmed reports of internal flooding immediately to the south of the site (2014 Report). Noted that there was a current planning application for the site on which it has provided advice on appropriate conditions for any permission.

Other Consultees

Cllr. Bensly – Strongly objected to this land being changed to anything other than tourism/leisure use. We have pockets of land ready for development elsewhere in village and they should be considered first. Reference to 'Back Lane' should read 'Back Market Lane', which is an important link and access.

Rt Hon Brandon Lewis MP – Was emphatically opposed to change of designation for site. It is still the best site for an expansion of tourism in Hemsby. Current owners have not explored every possibility for this, against the wishes of local people. Hemsby's tourism is source of jobs and wealth locally and more widely across Borough. Strongly recommended an alternative site should be identified for housing.

CPRE Norfolk - Allocation is too large and disproportionate to a Primary Village. Recognised the value of using brownfield land, so long as there is no realistic prospect of retaining the site as a holiday park. If developed for housing will be important that infrastructure, especially local roads, are improved beforehand.

Northern Trust – Agreed with allocation. Development would comply with Core Strategy in various regards. Site has good connectivity with established residential community, is accessible to local services and public transport, and is previously developed land. Site has no current value for tourism, and continued vacancy and dilapidation would have adverse effect on local tourism. Regeneration of this prominent, unsightly and dilapidated site would be of benefit to the local environment.

16 Individuals – Objected to the proposals for housing on the Pontins site, it should be retained for tourism use. Did not recognise importance of the local tourism economy & jobs. Site has not been demonstrated to be unviable for tourism. Need for capacity to relocate

businesses affected by coastal erosion. Site adjacent to the sports hall is preferable for housing. If this site is permitted housing other holiday areas will follow. Development of this site offers once in a lifetime opportunity to relocate the bus interchange. There are not adequate facilities and infrastructure to accommodate more development.

How these comments were taken into account

The potential long term value of the site for tourism, and its contribution to economy, jobs, and as a potential location for roll-back in the face of coastal erosion was fully recognised. The Plan does, however, have to deal with the situation as it currently is. The site had been vacant for around ten years. There was no identified means by which that potential could be realised in the near future, and in the meantime the site has continued to be an eyesore and a nuisance to those in the vicinity. This needed to be considered along with a range of other factors, and especially the current under delivery of housing in the Borough, as a result of which if the Council does not have the luxury of choosing only the best sites for housing. In all the circumstances, the allocation of the site is considered the best opportunity on balance of the available options.

The suggestion from a member of the public that parking and/or bus turning/standing facilities could be incorporated in the site is an interesting one, but a preliminary assessment suggested that this is unlikely to be practicable or feasible.

The various suggestions of the statutory agencies were accepted. The policy has been included in the final draft plan with amendments to address the suggestions of the statutory agencies.

Hemsby Site Selection Summaries (alternative sites)

Comments Summary

Hemsby Parish Council – A number of other sites have been put forward which could substitute for the former Pontins site. Many of these appear better than the Pontins site, and e.g. reasons for not allocating site 82 appear over-stated (other examples given). PC would prefer to see housing delivered on a number of sites, and not the Pontins site, which should be safeguarded for holiday use.

Site Promoters – Sites 1, 8, 45, 80 are suggested as appropriate and available for development.

How these comments were taken into account

As the Pontins allocation is carried forward as the most suitable site as evidenced by the Sustainability Appraisal Report, there is no need for further allocation within Hemsby as a primary village, therefore no changes were sought to the Hemsby section of the document.

Hopton on Sea

Comments Summary

Statutory consultees

Hopton Parish Council – The document is seen as a welcome addition to the Core Strategy. Longfulans Lane needs to be upgraded, but disagreed that outline permitted site will

contribute to its improvement. Additional access to A47 should be considered. Did not wish to see development to the north of the village, in order to maintain gap between Hopton and Gorleston.

Other Consultees

CPRE Norfolk – Strongly agreed with the proposal not to allocate any further housing. NCC (as landowner) & NPS – NCC owns land to North (ref 31) and S (ref 32) of settlement (and also site north of the latter with outline planning permission. Site 32, to the south, could be allocated now, or may be more suitable for the next phase of development. It would not fundamentally impact on the separation of settlements and there is no insurmountable highway constraint.

Potters Leisure – New site was submitted West of Coast Road. Wished to see it developed for mix of housing (to fund development) staff accommodation and other business uses. Car parking would be retained. Would assist future development of the resort business, and enable completion, in association with adjacent site with permission, of a proposed new road to replace the problematic Longfulans Lane.

How these comments were taken into account

Allocation of the new site associated with Potters Resort for a mixed use including some housing would help address the shortcomings of Longfulans Lane (in combination with the adjacent permitted site), help support the long term local tourism industry, and make a contribution to the additional Borough housing allocation requirements now considered necessary. Therefore allocation was taken forward of the site West of Coast Road for mixed housing/business/parking use including up to 40 dwellings.

Martham

Comments Summary

Statutory consultees

No comments

Other Consultees

Individual – Pointed out railway closed before the Beeching Report.

CPRE Norfolk – Strongly agreed with the proposal not to allocate any further sites.

Site Promoters – Object to the non-allocation of various submitted sites 14, 21, 29, 77, 113, 118. For some of these, suggest that references to access constraints are, variously, incorrect or subsequently overcome. New Sites submitted, ref. nos. 429, 430 and 431. Permitted site 281 development indicated to be almost underway.

How these comments were taken into account

Adjustments were made to the assessments of the sites in relation to the access information provided, but none of these are considered to alter the original assessment that further development, beyond the substantial number of dwellings already completed or permitted in Martham, would be appropriate.

Planning permission has recently lapsed for one site (ref. no. 282) which was previously identified as permitted. While the view could be taken that this could be indicative of a lack of interest in delivery, and excluded or replaced, it was understood a developer remains interested in it. In the circumstances it is considered appropriate to allocate this site, rather than reduce or replace the 108 dwellings it represents.

Therefore, Site Ref 282 has been taken forward as an allocation for housing development, replacing the previous indication of planning permission. This was consulted on as part of the Further Focused Changes Consultation.

Ormesby St. Margaret

Comments Summary

Statutory consultees

Ormesby St. Margaret With Scratby Parish Council – Objected to allocation. Development at Pointers East, which is Ormesby St. Margaret Parish, has already provided more than enough houses, and Section 106 monies have been allocated on that development and not for village infrastructure. The stress has already weakened the village infrastructure still further. Vehicular access to the 2 schools already compromised. Site is high quality agricultural land. Gravely concerned as to loss of significant archaeological site, including burial grounds and remains of both St. Peter's and St. Andrew's churches. The PC understands this is considered one of the top 6 unexamined sites in East Anglia.

Environment Agency – Agreed with policy. Had no concern with allocation for housing.

Historic England – Site included the former church of St. Peter. Development should be reviewed and justified in accordance with NPPF terms for non-designated assets. If site allocation is confirmed, specific provision in the policy should be made for avoidance and/or mitigation of the development on the site of St. Peter's and the Conservation Area.

Norfolk County Council Historic Environment - Agreed with policy, but given nature of development should maximise public benefit of archaeological investigation with community engagement / interpretation. Suggested wording re archaeological trial trenching, and NPPF paragraph updating.

Norfolk County Council Landscape – Supported retention of tree belt to southern and eastern boundaries. Site has high potential for bats. Relevant surveys will need to be undertaken and sensitive lighting strategy out in place.

Norfolk County Council Minerals and Waste Planning – Site within Minerals (sand and gravel) Safeguarding Area

Other Consultees

CPRE Norfolk – The draft allocations for Ormesby St. Margaret are disproportionate for a Primary Village.

24 Individuals – Various: Objected to allocation.

- Too large. Number of dwellings disproportionate to small village.
- Social housing will bring crime and anti-social problems to our pleasant community. No to any Council houses – keep them in Great Yarmouth.
- Loss of prime agricultural land and food production.
- Development at Pointers East, which is Ormesby St. Margaret Parish, has already provided enough houses. Future development should be on small, brownfield or infill sites.
- Traffic will cause noise. Will add to problems of inadequate parking in the village. Cromer Road is too small to accept development.
- The field separates the village from the main road and should stay that way.
- Site has archaeological significance – former church 12th century in use to late medieval; likely human remains; ring ditch cropmark to west.
- Loss of habitat for wildlife.
- Single access would cause congestion.
- Cromer Road has suffered surface water flooding, which would be exacerbated by such large scale development.
- Damage to environment.
- Trees should be maintained on edges of areas.
- Access should be from bypass only.
- Houses/bungalows should be in keeping with existing.
- Proposals should be in keeping with wishes of community, not some committee that doesn't live here.
- Sufficient parking should be provided.
- Loss of views.
- Would result in increase in pollution – noise, cars, motorbikes, dogs barking.
- Can schools cope.
- Would exacerbate existing problems of youth using woods to drink and take drugs. Pedestrian and cyclist safety.
- Sewerage and water problems.
- Access from A149 is unsuitable and unsafe to have more accesses.
- Water table is high and area unsuitable for housing.
- Need for additional educational, health and public transport facilities to support development.
- Site has been put forward without adequate notice or consultation.
- Shocked that residents were not made aware of proposals.
- In the past had a vandalism problem – quiet village is not an ideal place for children/young people to find entertainment.
- Pollution to nearby allotments.
- There will be no additional facilities to cope with the potentially 500 or more additional people: existing education and health facilities in village at max capacity.
- Additional pressures on water supply will require more recycling of sewage.
- Developers should fund a roundabout at the junction with the bypass. Current bypass removed traffic from the village and stopped most of the accidents, and this will put the situation back. Surface water must be managed within the site boundary.

Site Promoter – Strongly supported the allocation.

Landowner – Agreed with policy and is willing to follow the principles as outlined in the draft allocation. The site is available for development, viable, and owner is committed to its delivery in the plan period. Investigations have identified no significant constraints. Once an allocation is confirmed, and before a formal planning application, a public consultation will be held to ensure the views of the local community are taken into consideration in the design and layout of the development, and issues such as parking, drainage, access, archaeology, landscaping, and education are thoroughly investigated and adequately provided for/mitigated by the detailed design of the scheme. An archaeological desk study and geophysical scan have already been completed, and a scheme of trial trenching to be undertaken in advance of development has been agreed with NHES. It is envisaged the areas of the site likely to contain relevant archaeological features will be included in public open space. Interpretative boards will be considered, highlighting the presence of features and their historical significance.

How these comments were taken into account

The concerns of local people are noted, but the allocation remained considered appropriate, available and proportionate and the site assessment process has ensured the concerns raised have been assessed and addressed where necessary in the policy. The development is in accordance with the distribution of development decided by the Core Strategy. (The Pointers East referred to is in Ormesby Parish, but functionally and locationally relates more to the settlement of Caister, and hence is treated as part of that for the purposes of this Plan.)

The allocation has been carried forward into the final draft plan, with refinements to the policy and supporting text to make reference to the remains of St Peters Church, requirements of a protected species survey, and a requirement for evidence to assess the mineral resource and potential for prior extraction.

Winterton

Comments Summary

Statutory consultees

No Comments

Other Consultees

Cllr. James Bensly –Wanted to see policy, similar to Great Yarmouth and Gorleston, to stop any more hot food establishments in Winterton (and Hemsby) that cause traffic problems. Would like to see more encouragement to independent shops and a more interesting experience for both resorts. We have more than enough food establishments in a small area.

CPRE Norfolk – Strongly agreed with the policy not to allocate any more houses to Winterton due to stated reasons.

Site Promoter – Site 3 gained full residential use in a recent planning permission.

How these comments were taken into account

The existing local and national policies do provide support to refusals of planning permission where significant traffic problems can be demonstrated. Should the Parish Council wish to see more specific hot food (or other) policies, there is the potential for this to be done through the neighbourhood plan. Therefore no change was made to the Winterton section of the document.

Secondary & Tertiary VillagesComments Summary

Statutory consultees

No Comments

Other Consultees

CPRE Norfolk – While broadly support for the policy was given, is concerned there is a draft allocation for 5 houses at Runham, a Tertiary Village. Feel that windfall development alone will be sufficient to satisfy the housing target for Secondary and Tertiary Villages, which are classified as countryside, and therefore no allocations should be made. It is hoped that applications for windfall will be viewed more favourably if they include affordable housing. *[Note that this representation has been made in respect of all Secondary and Tertiary Villages, but has not been repeated for each in order to reduce repetition]*

Individual – Objected to Runham allocation being the only one for a Tertiary Village. The Core Strategy identifies the Secondary and Tertiary Villages as a locations modest growth to provide 5% of the Borough total over the Plan period to 2030. (The Runham allocation is shown below.)

How these comments were taken into account

This comment was explored in the draft Runham housing allocation below which was was not carried forward following the August 2018 consultation

BillockbyComments Summary

Statutory consultees

Fleggburgh Parish Council – Supported the Draft Local Plan Part 2.

Other Consultees

No Comments

How these comments were taken into account

Support was given to the section for Billockby, therefore no changes were made.

Burgh Castle

Comments Summary

Statutory consultees

No Comments

Other Consultees

9 SITE PROMOTERS – Objected to non-allocation of submitted sites on various grounds: 5 - is a suitable site; 6 - farm is run down and housing is the only long term option; 18 proposal is limited size tourism use plus new dwelling for security, would be well screened and suited to area, and there are few applications for tourism; 93 – great site for housing, settlement continues beyond this site; 95 – site is supporting any required road improvements, these sites are needed for small builders; 109 – would be willing to out in flood prevention measures; 145 – the assessment does not reflect the benefits of residential development outweighing the objection, site is prime and development will be screened. New sites submitted refs. 432 & 433.

How these comments were taken into account

There are road, flooding and environmental constraints affecting sites within Burgh Castle. Development to date together anticipated further windfall permission will provide sufficient development in the plan period and therefore no allocations were required.

Clippesby

Comments Summary

Statutory consultees

Fleggburgh Parish Council – Supports the Draft Local Plan Part 2.

Other Consultees

No comments

How these comments were taken into account

Support welcomed – no changes necessary.

Filby

Comments Summary

Statutory consultees

No Comments

Other Consultees

51 Individuals – Agreed with the decision not to allocate further sites, to protect the integrity and character of the village, etc. Consider many dwellings have already been permitted in Filby, with impacts on wildlife, traffic noise, landscape, etc. Schools are at capacity, etc. Inadequate drainage, sewerage and road network. Several agreed with the exclusion from

the development boundary of the cluster of dwellings to the east, or development boundary more generally.

Individual – Wished to see consideration of needs of first-time buyers, infrastructure and facilities, and adequate parking before giving permission for development.

Site Promoter – Filby House and Environs omitted from development boundary. Believed they should be included: good access, enclosed sites, screened from highway, contiguous with approved development.

How these comments were taken into account

With broad support for no further allocations within Filby, particularly considering the significant number of permissions/completions within Filby, no allocations are proposed in Filby in the final draft plan.

Fleggburgh

Comments Summary

Statutory consultees

Fleggburgh Parish Council – Supported the Draft Local Plan Part 2. Query characterisation of Fleggburgh as ‘well served’ and having ‘reasonable range of services’. Fleggburgh currently has higher percentage of new housing development compared to other Secondary Villages. Individual – Was concerned about lack of capacity at GP surgery, traffic, parking problems, drainage, road safety, etc. Draft Plan goes above the Government’s requirements for development. Strongly objected to site 89 (n.b. this was not a draft allocation, and outside draft development boundary).

Other Consultees

5 Site Promoters – Objected to no-allocation of sites ref. nos. 4 – assessment states no clear means of site access, but demolition of 7 Westfield Close would provide this; 66 – disagree there is no clear means of access; 67; 89, disagreeing with assessment – road improvements will have little impact on Trett’s Loke; 119 – site should be considered viable and conjoined with adjacent; 120 – sites are within 30mph limit, adjacent to current local plan (settlement boundary?), and within walking distance of facilities; 122 – site is adjacent to current local plan (settlement boundary?), and within walking distance of facilities.

How these comments were taken into account

The supporting text was clear that it is referring to Fleggburgh being one of the largest and better served of the Secondary Villages, which is indeed the case. It was recognised that it has seen a higher proportion of development than other secondary villages, and this was clearly shown in Graph (Figure 8.0.1) in the introduction to the Secondary Villages at the beginning of Section 8 of the Draft Plan.

No sites were recommended for allocation, in recognition of the scale of development that has already taken place and been permitted.

Fritton

Comments Summary

Statutory consultees

No Comments

Other Consultees

Somerleyton Estate – (1) Holiday Area covers only part of the Fritton Lake Resort. Seeks the whole of the Resort to be included. Emphasises the importance of the resort to the local economy, jobs and tourism offer, and ongoing plans for investment and upgrades. Provides details/maps of existing and proposed uses. (2) Promotes a new site for housing, potentially providing 10 to 15 dwellings.

Tingdene Holiday Parks – Caldecott Hall is an established tourism facility providing a wide arrange of attractions. Proposing to develop a range of holiday accommodation, including 10 Glamping Tent pitches, 12 Touring/Motorhome pitches, and 126 static holiday caravans on what is currently a golf course.

Site Promoter – Objected to non-allocation of 2 submitted sites: 13 – Issues not sufficient exclude site, road can support traffic generated, there is no ban on ribbon development; 411 – lane is good enough for access to Fritton Woods, so can cope with a dwelling;

How these comments were taken into account

The Holiday Area designation (Draft Policy L1-dp) was not intended to include all areas in tourism uses, but those that are more built up. Other areas would need to be considered in relation to their impact on landscape, etc., but tourism uses are not ruled out just because they are outside Holiday Areas. That said, it is accepted that there is a need to redraw the boundaries in the Fritton area to take on board some of the information provided.

Proposals such as those described by Tingdene can be considered under the generic Policy L2 in the final draft plan.

Generally housing development was not allocated in the Tertiary Villages because the Core Strategy seeks to focus development where it can best access and support facilities, and avoid car dependence. The site in question lies on the busy A143, opposite the Decoy Tavern. Although there is a bus service along the A143, the facilities in Fritton, and even nearby St. Olaves, are limited. It is not considered that this site is so advantageous as to warrant allocation in light of all the considerations.

Mautby

Comments Summary

Statutory consultees

No comments

Other Consultees

Site Promoter – ‘Agreed’. Highlights submitted site for small scale tourism, which is said to comply with Draft Policy L3-dp.

How these comments were taken into account

The merits of the proposal suggest can considered through a planning application, with regard to Policy L2.

Repps with BastwickComments Summary

Statutory consultees

No Comments

Other Consultees

3 Site Promoters – Objected to non-allocation of sites: 9, 106, 107, 108. With regard to Site 9 the promoter stated that flood risk concerns can be overcome by raising floor levels.

How these comments were taken into account

It is not considered necessary or desirable to allocate land for housing development in this settlement to achieve the best combination of developments to meet the requirements of the Core Strategy. Site 9 and 108 are wholly in indicative Flood Zone 3b as identified in the SFRA and wholly within flood zone 3a according to the Environment Agency's flood map for planning. This indicates that housing development on these sites would be contrary to national planning policy.

RollesbyComments Summary

Statutory consultees

No Comments

Other Consultees

4 Site Promoters (plus agent of one) – Objected to non-allocation of sites: 23; 36, 413, 414.

How these comments were taken into account

There were a number of developable sites in the area. Rollesby has some facilities, and in the Parish Council has indicated its support for some additional development, and is currently exploring potential allocation options for the neighbourhood plan it is preparing.

Given the level of development proposed within the Local Plan and the distribution strategy set out in the Core Strategy, it is not considered necessary to identify any allocations in Rollesby. However, this does not prevent the Rollesby Neighbourhood Plan from allocating sites for housing in accordance with Policy GSP2 of the plan.

RunhamComments Summary

Statutory consultees

Mautby Parish Council - The parish council's view was that nothing has changed from the

previous two planning applications and planning inspector's decisions, so the site should be removed from the draft plan.

Norfolk County Council - Historic Environment – Archaeological investigation required for before Draft Allocation developed.

Norfolk County Council - Minerals and Waste – Draft Allocation within Minerals (sand and gravel) Safeguarding Area, but no measures required unless the site is increased above 1ha.

Norfolk County Council – Transport - Concerns regarding the proposed allocation for 5 dwellings as there is no school, the road network is poor and the site is remote.

Norfolk County Council Lead Local Flood Authority - Watercourse not apparent (in relation to SuDS hierarchy if infiltration is not possible) No surface water apparent.

Water Management Alliance – Draft Allocation site lies adjacent to boundary of the Board's area. If future proposals include discharge of surface water or treated foul water to a watercourse within the IDD, consent would be required.

Environment Agency - We had no concerns relating to housing being allocated at this site.

Other Consultees

CPRE Norfolk - As an area designated as countryside and with the addition of anticipated windfalls, Runham should not receive any allocation for housing, in part as this would be contrary to policies preventing housing in such areas. The draft allocation site is not one which would not provide sustainability, given the lack of services.

10 Individuals – Objected to allocations in grounds, variously, of: site previously refused repeatedly permission and appeal dismissed, and nothing has changed since; site assessment inaccurate; public transport only 2 buses a week; there are no facilities/amenities; village already has a bowling green, and doubtful this would materialise; inadequate consultation; additional traffic on narrow country lane, close to 90 degree blind bend; access would be unsafe; loss of high grade farmland; lack of mains drainage; contrary to various national/county/local policies; allocation no longer required for revised housing numbers.

How these comments were taken into account

This site was not carried forward into the final draft Local Plan. The main rationale for considering the site was due to a possible requirement in national planning policy to allocate a certain proportion of small sites. This requirement never came into force therefore the main rationale for allocating the site was removed. The site is not in a particularly sustainable location with poor access. Given the level of development proposed in the plan and the distribution of development as described in the Core Strategy

Policy CS2 there is no need to allocate land for housing in Runham. The option of not-allocating this site was further consulted on in the Further Focused Changes consultation.

Scratby

Comments Summary

Statutory consultees

No comments

Other Consultees

CPRE Norfolk - strongly agreed with not allocating any further housing, in tertiary villages and its position as a Tertiary Village within landscape categorised as countryside.

5 Individuals – Promoted different unallocated sites: Site 11 (W of Scratby Rd.) is a viable option for development. It is close to local services pub restaurant public transport playing field etc. Situated off the old coast road its location from a safety aspect far outweighs other near developments that have already been granted or built on.; Site 311 (w of Scratby Rd.) is small but still relevant for future development of a single dwelling, still designated as part of the old Scratby Hall and Farm (Old Duncan Hall School); Site 104 (S of Beach Rd.) would help Great Yarmouth meet its housing target; New site 440 (land adj. to 14 Beach Rd.) is a good site that can be added to a smaller adjacent site that is being built currently, and delivered within 1 year.

How these comments were taken into account

The assessment of the previously submitted sites had not changed significantly. The new site now has a planning permission and construction has commenced. There is sufficient housing proposed in the Local Plan Part 2 to meet requirements and the distribution as set out in the Core Strategy. Therefore no allocations are proposed in Scratby.

St. Olaves

Comments Summary

Statutory consultees

No Comments

Other Consultees

CPRE Norfolk - strongly agreed with not allocating any further housing, due to the stated reasons, and its position as a Tertiary Village within landscape categorised as countryside

Individual – Proposed new site (ref. 443 - Land East of Priory Restaurant) for a single dwelling.

How these comments were taken into account

St. Olaves is not a settlement where the Council is seeking additional growth as per the Core Strategy distribution Policy CS2. The site area is excessive for a single dwelling, and hence not making the best use of land, contrary to the NPPF. Therefore no allocations have been made in St Olaves.

West Caister

Comments Summary

Statutory consultees

No Comments

Other Consultees

CPRE Norfolk - strongly agreed with not allocating any further housing, due to the stated reasons, and its position as a Tertiary Village within landscape categorised as countryside Individual – Agrees with proposals, but reasons not sufficient for not considering this site (refs. 96 & 426). New housing needed in West Caister.

How these comments were taken into account

The reasons for not allocating the site are set out in the Sustainability Appraisal Report. There is sufficient housing proposed in the Local Plan Part 2 to meet requirements and the distribution as set out in the Core Strategy. Therefore no allocations are proposed in West Caister.

Other Tertiary Villages not previously listed (Ashby with Oby, Browston, Ormesby St. Michael, Somerton, Stokesby & Thurne)

Comments Summary

Statutory consultees

No Comments

Other Consultees

CPRE Norfolk - strongly agreed with not allocating any further housing, due to the stated reasons, and its position as a Secondary or Tertiary Village within landscape categorised as countryside

How these comments were taken into account

Comments noted and no changes necessary.

Monitoring Framework

Comments Summary

Statutory consultees

NCC Historic Environment – Agrees with content.

Other Consultees

No Comments

How these comments were taken into account

Support welcomed for the approach within the monitoring framework, therefore section was carried forward and amended to bring it up to date.

Appendix 2

Policies to be superseded upon adoption of this plan document

Comments Summary

Statutory consultees

Norfolk County Council Historic Environment – Replacement of BNV2, BNV8, BNV12 with Draft Policy
If Draft Policy E8-dp should not be a problem if the latter is sufficiently robust with regard to heritage assets with archaeological interest (as separately advised).

Other Consultees

Individual – Was concerned with proposed loss of saved policy EMP26 which seeks to identify and safeguard a non-statutory alignment for a future rail link to the port. Great Yarmouth is one of the very few ports of its size in the country which currently does not have a rail link to the network. Both Government and the Opposition are talking of upgrading the country's rail facilities in the future. Great Yarmouth could lose a great strategic opportunity.

How these comments were taken into account

NCC's comments in relation to policy E8 are considered under that policy. In terms of the rail link this is not currently viewed as a deliverable link, therefore is not currently being perused through the Local Plan Part 2, therefore no change was made to the sections of the Local Plan Part 2.

Appendix 4

Habitats Monitoring and Mitigation Strategy

Comments Summary

Statutory consultees

No comments

Other Consultees

RSPB – Supported the inclusion of the Habitats Monitoring and Mitigation Strategy as an appendix to Part 2 of the Local Plan, therefore securing the policy status of the Strategy. This is an important step in ensuring that impacts from new development are not simply recognised, but measures to address impacts are actively resourced and implemented. We noted the progress now being made with the strategy and are happy to play a role in helping to get this to a point where it is making a difference for the protected sites within the Borough.

How these comments were taken into account

Support welcomed from the RSPB, however, in light of evidence from Norfolk Wide evidence and wider work which is ongoing this section was removed.

Supporting Document

Draft Habitats Regulation Assessment Report

Comments Summary

Statutory consultees

Natural England – Satisfied by the Assessment, and considers it provides a detailed and comprehensive assessment of the relevant 'likely significant effects' of the Part 2 Plan, and together with the Monitoring & Mitigation Strategy provides adequate certainty of European

site protection.

Norfolk County Council Landscape - The ecology team have specifically considered the HRA. It is of a very high standard and clearly fit for purpose.

Other Consultees

RSPB – Supported the conclusions within the HRA, but suggested some minor refinements and additional information for a few areas of the report.

How these comments were taken into account

Following broad support for the Draft Habitats Regulation Assessment Report no significant change are required, but minor changes to wording in the light of RSPB suggestions were made.

Supporting Document

Draft Sustainability Appraisal Report (incorporating Strategic Environmental Assessment)

Comments Summary

Statutory consultees

Natural England – Was generally satisfied that the methodology and baseline information used to inform the scoping report appears to meet the requirements of the SEA Directive [2001/42/EC] and associated guidance. Suggested four minor refinements or additions.

Other Consultees

LANPRO (on behalf of Badger Building) – Considers revisions to scoring of Site Ref. 20 (West of Beccles Rd., Bradwell).

Persimmon – Repeated arguments in favour of allocation summarised elsewhere, but no comments on SA Report found.

5 Individuals (in 4 representations) – Disagreed with the assessments of Site 63 at Runham. Two representations suggest specific alternative scoring for the site.

How these comments were taken into account

Some of Natural England's suggestions were accepted.

For others, while the ambitions are unobjectionable, but the suggested wording was not considered appropriate for the particular location suggested (e.g. amending the definition of an objective to include a potential policy that relates to it).

It was not agreed that the scoring of the Bradwell site requires revision. It was agreed that some of the some of the scoring of the Runham site should be amended, but not all of the specific suggestions were accepted. Therefore Minor amendments to text in line with some (only) of Natural England's suggestions were made alongside amendments to the scoring of the Runham site.

Draft Local Plan Part 2 Further Focused Changes Consultation August 2019

The table below sets out the number of respondents and comments received to the consultation.

	Further Focused Changes Consultation
Total Number of Responses	222
Total Number of respondents	94

The following sections summarise the comments received on each part of the consultation document and how the Council has taken those comments into account in the Final Draft Local Plan Part 2.

Meeting Housing Needs

Comments Summary

Statutory Consultees

Norfolk County Council – Had no concerns in principle with the additional allocations which alter the distribution in the CS slightly. Stated that the significant over provision within the buffer does not raise any significant concerns. They added there needs to be clarity in the emerging Local Plan as to the revised housing target with a clear policy setting out what the new housing figure is over the plan period (2013-2029). In addition, there is a need to provide a clear explanation as to why the Borough is over-providing by 50% in the plan period and ensuring that supporting infrastructure and service is provided in a timely manner.

Other Consultees

Persimmon Homes Anglia –

Persimmon Homes made the following comments in regards to meeting housing needs:

- The Standard method reflects the under supply in housing land in recent time. Therefore, the new approach welcomed along with the additional allocations creating a reasonable buffer.
- Great Yarmouth's Housing Action Plan notes 3,250 dwellings with consent in the borough with only 583 under construction.
- A key challenge for the council is converting more of these into starts and completions.
- Welcome the amendments to the distribution as this better balance's growth in the borough. Limited constraints at Caister can be overcome.

Site promoter: Stated that Hemsby should have further site allocated to ensure distribution of new development is evenly spread.

Pleasure and Leisure Corporation: Supported the increased provision in the plan.

Members of the Public

Some members of the public questioned the need for housing and the rationale for over allocating whilst there is support for a more comprehensive range of sites.

One individual noted that there is a slight anomaly in numbers when looking at individual allocation policies compared to overall numbers listed in this policy (8 extra homes).

Also concern from public of why some sites of a similar size are allocated for a different number of dwellings.

How these comments were taken into account

This section of the plan has been amended and clarified to address concerns by Norfolk County Council and others on the numbers. It is considered essential to retain a buffer (albeit smaller than originally proposed) to ensure flexibility in the supply of homes.

The additional site in Hemsby has been appraised (new site 462) as an alternative site. However, the site does not offer the comparative benefits (and lack of constraints) to replace one of the current selected allocations in Primary Villages, and with a substantial buffer of over 30% no further allocations are required to redistribute growth in the Primary Villages or contribute to the overall housing growth to meet housing need.

ADA1 South of Links Road, Gorleston-on-Sea (Policy GN1 in Reg 19 Version)*Comments Summary***Statutory Consultees**

Natural England – Supported project level Habitats Regulations Assessment and inclusion of SuDs, particularly seeking maintenance in perpetuity. GI contributions should include 40% accessible natural greenspace (in line with Policy H12). Further weight (plan wide) should be given to soils and their intrinsic value, in line with NPPF170).

Highways England – Commented on the potential that particular proposed allocations (including ADA1) have potential to impact upon A47 trunk road and roundabouts. It was recommended that further information on the likely transport impact and any indicative mitigation measures be identified and referenced on the supporting Infrastructure Plan.

Historic England – Supported policy, particularly heritage statement and archaeological requirements. No objections to allocation.

Anglian Water Group - Generally supportive of policy but recommended amendments to separate policy requirements for flood risk assessment, foul water drainage, and provision and design of sustainable drainage systems to emphasise their individual importance.

Norfolk County Council (Infrastructure & Growth) –Supported reference to NCC planning obligation requirements.

Norfolk County Council (Highways Authority) – No objections subject to Transport Assessment, mitigation and infrastructure measures listed:

- Two points of access (links road). Appropriate visibility splays;
- Required active frontage on Links Road;
- Shared use facilities (ped/cycling) along Links Road (north & south), link with existing facilities on A47; and,
- Western side (internal to site) shared use facility between Links Road and A47 toward Hopton.

Norfolk County Council (Lead Local Flood Authority) – Indicated that there were few or minor constraints identified with some minor surface ponding on site.

Hopton Parish Council – Sought to confirm the retention of S.106 monies retained within Hopton parish boundaries and sought further clarity on the number/type of proposed retail/commercial units proposed. The rationale for accessing off Links Road, rather than direct off the A47 was

questioned. Confirmation of maintaining the settlement gap between Hopton-on-Sea and Gorleston was requested.

Other Consultees –

Norfolk County Council (landowner) - They supported the allocation in principle though consider that (in policy terms) the scale of proposed retail development should be unrestricted and instead tested by the market and retail impact assessment. Structural landscaping requirements supported but to be delivered in phased manner, with majority provided to the south.

Norfolk Wildlife Trust – Supported reference to net biodiversity in proposed allocation but suggests this be applied to all allocations and required of all developments as a plan wide policy.

Bourne Leisure (local tourist operator) – They supported maintaining the strategic gap and provision of open space at southern extent of allocation but raised some concern regarding the likelihood of unreasonable knock on effects upon the operation of existing businesses including Hopton Holiday Park. They reiterated that details should be provided of suitable mitigation measures (e.g. noise, traffic, air quality, landscaping etc) during construction phase and delivered prior to site completion.

East Coast Hospice – The hospice raised a question regarding the collection of S.106 contributions to fund hospices.

General Public – General concerns were raised regarding the built/aesthetic quality of new homes; pressure upon existing services; access suitability off Links Road (and not A47 direct); environmental impacts e.g. loss of productive farmland, carbon footprint; ensuring brownfield sites developed first; and, offset impact through tree planting and more cycling provision.

How these comments were taken into account

The policy has been carried forward into the final draft local plan.

Further transport modelling work has been undertaken to assess the impact of the proposed allocations on the strategic road network. Reference to the possible mitigation requirements was added into the supporting text.

The retail/commercial element has been removed from proposed allocation in order to consolidate retail need at proposed Beacon Park District Centre. This would ensure that viability of the District Centre which is already designated under Policy CS7 of the Core Strategy is not potentially undermined.

The requirements for site-specific Flood Risk Assessment and sustainable drainage measures were separated for greater clarity in the allocation.

Criteria 9 was amended to remove reference to net biodiversity gain, instead including reference to meeting net biodiversity gain in supporting text to Policies GSP6 and E4 to provide plan-wide coverage of requirement. Reforms coming through the Environment Bill will require biodiversity net gain on most developments.

In terms of the concerns about amenity raised by Bourne Leisure, the plan (read as a whole) includes the emerging amenity policy which considers impact upon amenities of occupiers. Measures to control/mitigate impact will also be considered through planning process e.g. EIA.

The site is currently grade 2 agricultural land. However, large parts of the Borough comprise grade 1 and grade 2 agricultural land meaning that there are very few alternative options which would result in less high-grade agricultural land being developed. The Council has already allocated large areas of

brownfield land in the waterfront area of Great Yarmouth for development. However, whilst the Council is working hard to deal with the viability issues with bringing this land forward, there is an any case insufficient brownfield land in total to meet housing needs.

With respect to concerns about design, design policies have been strengthened and reference was made to the new National Design Guide. This includes the provision of landscaping and trees within developments. Additionally, reforms coming through the Environment Bill will require biodiversity net gain on most developments.

The approach to receiving S.106 contributions towards healthcare was refined following further discussions with NHS partners.

ADA2 Emerald Park (Policy GN2 in Reg 19 Version)

Comments Summary

Statutory Consultees

Natural England – Recommended project-level Habitats Regulations Assessment.

Historic England – Welcomed criteria 4 and supporting text which references heritage statement and archaeological requirements. No objection to policy.

Norfolk County Council (Highways Authority) – They noted no objections in principle, subject to TA (and agreed mitigation measures) and following on/off site improvements: vehicular access taken off Woodfarm Lane (and modification of existing TRO if required); Woodfarm Lane to be widened and incorporate cycle facility (south-east) to connect to Beaufort Way; extension of footway north and eastwards to connect with existing facility at Ormiston Herman Academy, Oriel Avenue.

Norfolk County Council (LLFA) – Indicated that there were some minor surface water issues apparent e.g. ponding on site.

Norfolk County Council (Infrastructure & Growth) – They noted that the allocation should reference all appropriate planning contributions and supporting text expanded to reference infrastructure being provided in a timely manner.

Anglian Water Group - Generally supportive of policy but recommended amendments to include policy requirements for flood risk assessment and provision and design of sustainable drainage systems to emphasise their individual importance.

Other Consultees

Norfolk Wildlife Trust - Supported reference to net biodiversity in proposed allocation but suggests this be applied to all allocations and required of all developments as a plan wide policy.

Site Promoter –

Recommended that the policy requirement for new footpaths be removed due to:

Submitted further information (in support of the current planning application) demonstrating that existing footpath network is sufficiently suitable and attractive to encourage future residents to use them.

- Requirement would fail to be necessary under national planning policy (NPPF54-56).
- Other larger consented housing development nearby, including “Site 25” did not require such improvements.

Recommended that policy requirement seeking minimum 10% affordable housing contribution be removed due to:

- Site being brownfield land;
- Allowance in national policy to affordable housing proportionately to offset bringing brownfield land back into viable use.

Recommended that policy be amended to allow greater flexibility in the circumstances that dictate the relocation/funding of the stadium facility, depending on whether it is surplus to requirements or not.

Members of the Public

Reiterated potential opportunity to relocate Gorleston Football Club to Gorleston recreation ground rather than East Norfolk College.

How these comments were taken into account

The policy has been carried forward into the final draft plan.

Natural England's suggestion of an HRA will be picked up by the plan wide HRA and any application would need to be supported by a project level HRA to be compliant with the Monitoring and Mitigation Strategy. Norfolk County Council's comments regarding contributions to infrastructure were clarified in the policy text. Anglian Waters comments regarding flood risk assessment and SUDs was added to the policy. Wider public's comments & site promoters comments were noted in regards to a replacement facility. The policy is not specific on where the facility should be but it is noted that the application for a replacement facility at East Norfolk Sixthform College has now gained a resolution to grant permission. Therefore the policy was taken forward with amendments to the policy text as noted above.

ADA3 Shrublands Community Facility (Policy GN6 in Reg 19 Version)

Comments Summary

Statutory Consultees:

NHS Norfolk and Waveney STP: Supported provision of new healthcare facility to meet current and future needs.

Historic England: Noted the Grade II listed building within site boundary and a cluster of Grade II listed buildings to north which the policy should reference. They suggested to re-word criterion 4 so that it is closer to NPPF to conserve and where appropriate enhance the setting of listed buildings. They added that retention/reuse of Shrublands should be complementary to its historic status.

Norfolk County Council – Lead Local Flood Authority: stated that there were few/no constraints and standard information would be required at planning application stage. They noted minor surface water ponding apparent within site.

Norfolk County Council – Highway Authority: No objection subject to a transport statement, access from Magdalen Way only with visibility standards and footway to be a minimum width of 2m, and bus stop improvement required.

Norfolk County Council – Infrastructure & Obligations: Requested that the policy makes reference to all appropriate contributions and that infrastructure provided in timely manner, the supporting text.

Anglian Water: Generally supportive of the policy and stated that the policy should require a site specific flood risk assessment (NPPF) and suggested a surface water and foul drainage strategy is submitted.

Other Consultees

Scout Group: Noted they had longstanding use of site for activities & require continued use including open space on the site. They noted that additional housing in wider area contributes to further demand for Scouts & activities. They stated they would have a strong objection to the allocation if use is not retained on the site.

East Coast Hospice: Stated that section 106 contributions towards hospice care should be considered.

Norfolk Wildlife Trust: Recommend inclusion of biodiversity net gain in the policy and stated that any specific requirement from HRA should be incorporated into policy.

Members of the Public:

Members of the Public raised the following concerns:

- Green space should be retained for community use, noting this has been a longstanding use of the site by many groups
- General under-provision of accessible green space in Gorleston
- No housing should be built in site.
- Lack of consultation and information for public
- Need to modernise buildings on site which are poorly configured
- Could update access which is a confusing one-way
- No need for access from Trinity Road

How these comments were taken into account

The policy has been carried forward into the final draft plan.

The extent of healthcare facilities, recreational facilities and retained open space has been made clearer in the policy. The policy was amended to make clear that should open space or recreational facilities for Scouts (and other community groups) be lost, compensatory provision will need to be secured to ensure that a suitable alternative accessible facility of equivalent quality is delivered.

The policy was amended to state that vehicular access should be only from Magdalen Way.

The wording in policy on historic assets (and their setting) was strengthened to address Historic England's concerns. The policy was also amended to require flood risk and foul drainage assessments.

It was not considered necessary to mention biodiversity net gain. Instead include reference to meeting net biodiversity gain in supporting text to emerging GI/Biodiversity Policy to provide plan-wide coverage of requirement.

The policy was refined to include reference to likely section 106 contributions.

It was considered that extra-care housing or sheltered housing would be suitable on the site given the provision of a health care facility and the site's central location. Therefore, the policy continued to include this possibility.

ADA4 North of A143, Bradwell (Policy BL1 in Reg 19 Version)

Comments Summary

Statutory consultees

Natural England – Supported the inclusion of SuDS, their future maintenance and requirement for a project level Habitats Regulations Assessment.

Historic England – Sought to acknowledge in policy and supporting text the interrelationship between Farmhouse and St Nicholas Church (2x heritage assets) and suggests providing open space on site's northern limits to protect setting/maintain views of the heritage assets. The future road connection to Church Walk was considered inappropriate.

Highways England – Commented on the potential that particular proposed allocations (including ADA4) have potential to impact upon A47 trunk road and roundabouts. It was recommended that further information on the likely transport impact and any indicative mitigation measures be identified and referenced in the supporting Infrastructure Plan.

Anglian Water Group– Generally supportive of policy but recommends amendments to separate policy requirements for flood risk assessment and provision and design of sustainable drainage systems to emphasise their individual importance.

NHS Norfolk and Waveney Sustainable Transformation Partnership (STP)– Supported proposed allocation and reference to appropriate financial contributions but sought further detail in the allocation on the phasing of mitigation measures.

Norfolk County Council (Infrastructure/Growth) – Supported the requirement for NCC planning contributions within the allocation.

Norfolk County Council (Local Lead Flood Authority) – Indicated that there were some minor surface water issues apparent e.g. ponding on site and the impact upon the Critical Drainage Area (east of the site) should be considered.

Norfolk County Council (Highways) – They noted that off-site improvements to the A143/Mill Lane/Long Lane junction will need to be resolved to make the development acceptable. Other on-site/off-site improvements would include the widening of the shared use facility between A143 and Stepshort; widening off New Road frontage carriageway with signal controlled crossing; and safeguarding of highway access of the land to the north.

Norfolk County Council (Member) – It was raised that the proposed allocation would have implications for further traffic and congestion in the area, and would need to address any local highway concern/issues relation to traffic volume and safety.

Other consultees

Norfolk Wildlife Trust - Supported reference to net biodiversity gain in proposed allocation but suggests this be applied to all allocations and required of all developments as a plan wide policy.

East Coast Hospice – The hospice raised a question regarding the collection of S.106 contributions to fund hospices.

Badger Building (Site Promoter) – Reiterated their support for the proposed allocation, evidenced by the submission of hybrid planning application (considered by the site promoter to provide certainty of delivery for housing). The site promoter confirms that the site could commence quickly after grant of planning permission, anticipating a delivery of 50 dwellings per year.

Parker Planning Services: submitted an alternative site on behalf of their client (Site 444 - north of Market Lane). They considered that the impacts of proposed allocation (highways, SW flooding, and scale/principle) would not outweigh the benefits of allocation. They suggested that an alternative would be to scale back the development to reduce the pressure on the highway and help maintain the strategic gap between Bradwell and Belton. They disagreed with Council's assessment of Site 444 (north of Market Lane) with respect to its impact upon the strategic gap and its distance away from services and facilities. They suggested that their client's site be considered as an alternative to the proposed allocation, or, if the proposed allocation was scaled back, be allocated in addition to provide the housing needed and further local facilities.

How these comments were taken into account

Following feedback to the consultation further transport modelling work was undertaken to explore the transport implications of the allocations. The modelling showed no impact on the trunk road network. However, work on the concurrent planning application has indicated that the concerns raised by the highway authority currently appear to be unresolvable. The potential impacts of the allocation on the Mill Lane Junction as indicated by the highway authority means that the allocation has not be carried forward into the final draft plan. Furthermore, the site is not considered essential to meeting housing requirements and would result in a loss of higher grade agricultural land.

Site 444, being argued in addition to the (reduced) proposed allocation would not be necessary as the emerging plan already has a substantial over provision of housing from currently identified sites to meet its housing requirement, even with the removal of the North of A143 allocation. The suitability of the site is constrained due to its close proximity to the Broads Authority Area and sloping topography, which would make the mitigation of landscape impacts upon the Broads more difficult to achieve. This is reiterated by the Council's Settlement Fringe Study which identifies the area within and around the site as having low capacity for development.

ADA5 West of Jack Chase Way, Caister-on-Sea (Policy CA1 in Reg 19 Version)

Comments Summary

Statutory Consultees

Anglian Water Group – Generally supportive of the policy but recommended amendments to make reference to the requirement for a flood risk assessment, provision and design of sustainable drainage systems and reference to the sewer main which runs through the site.

Caister Parish Council –the ability of roads to cope with increase in traffic has been overestimated and that the unintended consequences of the development, will result in drivers using Ormesby Road, High Street and Prince of Wales Road as rat runs. It was suggested that a footbridge should be provided rather than a traffic light crossing. It was questioned why the development could not be accessed from the roundabout at Norwich Road/Jack Chase Way to the south of the site. Concern was raised about the impact of development on the sewage treatment works. Concern was also raised about the impact on medical centres, dentists and schools. Concern was raised that just provision of land on the site would not secure the delivery of a new school or medical centre and that money would also be necessary for build costs. The Council also raised concerns about the loss of trees and hedgerows along Jack Chase Way and the potential impact on wildlife. The loss of grade

1 agricultural land was also noted and concern was raised about the lack of land available to provide food. The Council noted that many in the village believed that the new development would only provide new homes for people wanting to move into the area. The Council stated that the lack of facilities proposed on the development site meant that many new residents would have to use shops in Caister which will put pressure on car parking. It was stated that the large stores in Caister would not be geared up for an increase in population and cannot expand.

Historic England – raised concern that development could impact on the settings of nearby heritage assets including the Grade I listed Caister Castle and Grade II* Caister Hall, the Grade II listed Church of St Edmund ruins and the Grade II The Grange. They raised particular concern about the impact on the setting of Caister Castle and stated that a Heritage Impact Assessment should be undertaken prior to allocation in the Local Plan. They suggested the policy should be amended to take into account any findings from a Heritage Impact Assessment and that the policy should reference the potential impact on all nearby assets and landscaping to the south should screen views from Caister Castle.

Natural England - Supported the delivery of improved connectivity to the wider countryside through the provision/extension of footpaths/ bridleways and the inclusion of informal open space. Supported the inclusion of biodiversity net again and requirement for a project level Habitat Regulations Assessment.

Norfolk County Council – Stated that developer contributions towards County Council infrastructure will be required and that this should be referenced in the policy. The Council welcomed the requirement in the policy for a 2ha site being safeguarded (within the development) for the provision of a new 2 form entry primary school.

Norfolk County Council Local Lead Flood Authority – Indicated that there were few or no constraints from a surface water flood risk perspective.

Norfolk County Council Highway Authority – No objection to the allocation. They noted the requirement for two accesses from Jack Chase Way in a form to encourage reduced vehicle speeds (preferably roundabouts, or traffic signals). They stated that shared use cycle facilities should be provided on both sides of Jack Chase Way providing connections with Norwich Road and Prince of Wales Road and to the new housing development to the north. They noted that features should be introduced to enable cycles and pedestrians to safely cross Jack Chase Way and to alter the environment of the road, encouraging lower vehicle speeds of up to a maximum of 40mph. They stated that the frontage hedge along Jack Chase Way should be removed and the development should be integrated with Jack Chase Way to develop a sense of place. They stated a Travel Plan will be required.

Norfolk and Waveney Sustainable Transformation Partnership (Health) – supported requirement for 0.75 hectares of land for the health centre to be provided at no cost.

Other Consultees

Caister Road Safety Committee – raised concern that traffic will be forced to travel through Caister village giving rise to safety concerns, due to congestion caused by number of changes needed to Jack Chase Way to accommodate the development. It was suggested that a pedestrian bridge from the development site over Jack Chase Way would be preferable over traffic lights to enable a safer route for children to school. Concern was raised that a new school was not being required, only land for it. Concern was also raised with regard to utilities, environmental impacts associated with the loss of hedgerows and tree, lack of facilities and loss of agricultural land.

Norfolk Wildlife Trust – supported the reference to biodiversity net gain although suggested that requirements should apply to all allocations in the plan and other new development permitted by the plan.

Persimmon Homes – supported the allocation noting the sustainability of Caister for further growth and that the site represents the best location in Caister to meet such needs. Persimmon Homes noted that the site area for medical centre would be unlikely to exceed 0.75 hectares. Persimmon Homes made the following comments on the content of the policy:

- Bullet 1: Concern with the requirement for 10% retirement housing and stated the Council should provide evidence to justify this. They suggested that the 10% could be required through applying the M4(2) adaptable homes standard to 10% of the properties. They suggested that the phasing requirement for older people housing should be deleted to enable this type of housing to be more evenly distributed through the development.
- Bullet 2: Persimmon Homes suggested that the site could be completed by 2030 and could accommodate two outlets.
- Bullet 5: Concern was raised about the restriction on rear parking courts. They suggest alternative wording
- Bullet 8: noted that there was a lack of existing footpaths and therefore the policy should be reworded to make reference to onsite footpaths.
- Bullet 11: stated that the land for healthcare uses should not be provided free of charge as the development does not generate the need for an entirely new health centre utilising 0.75 hectares of land.
- Bullet 12 and 13: They stated that discussions with the Parish Council indicated that there was no requirement for a replacement village hall on the site and therefore the Bullet 12 should be deleted. However, they noted the possibility of providing a community centre within the local centre and suggested amendments to Bullet point 3.
- Bullet points 14,15,16,17,18: They stated that this will comply with these requirements.

Persimmon Homes stated that discussions with Norfolk County Council Highways had confirmed that the site is in a sustainable location for walking and cycling and that proposed improvements would not impede the functionality of Jack Chase Way. They added that the design work to date has evidence that a new community can successfully integrate functionally and visually with Caister. Persimmon Homes stated that there emerging designs were high quality and that the second sentence of paragraph 3 was inappropriate and should be deleted. They noted that discussions with a commercial agent indicated there was high demand for the local centre.

East Coast Hospice – The hospice raised a question regarding the collection of S.106 contributions to fund hospices.

Water Management Alliance (IDB) –noted that if future proposals include discharge of surface water or treated foul water into a watercourse within the Broads a consent would be required under the Land Drainage Act and the Broads Byelaw 3.

Members of the Public

The main concern of most respondents was in relation to traffic impacts. Concern was raised about the impact of the development on the levels of traffic through the village. It was suggested that an

increase in number of junctions from the bypass and a reduction in speed limit would mean more through-traffic would likely go through the village. It was suggested that a footbridge should be provided over Jack Chase Way as this would allow Jack Chase Way to continue to function as a bypass. It was suggested that vehicular access should be provided from the existing roundabout at Norwich Road/Jack Chase Way. Concern was also raised around traffic at the existing schools.

Many people also raised concern about the impact on the hospital, dentist surgery and GP surgeries which were considered to already be at capacity. It was suggested that the provision of land for a new doctors surgery was futile as the existing surgeries were having to close early due to a lack of GPs. Some respondents suggested that the village schools were at capacity and that development would lead to an increase in class sizes to the detriment of pupils. Concern was raised that the police would not be able to deal with the increase in population. It was stated that infrastructure on site should be delivered alongside the completion of new homes.

A number of respondents also objected to the potential loss of hedgerows and trees on the boundary of the site and the potential detrimental impact on wildlife as a result. Concern was also raised more generally about the impact on biodiversity. It was suggested by one respondent that the land would be better used as a community woodland.

Most respondents raised concern that the sewage treatment plant would not be able to cope with the extra development.

Other concerns/objections related to:

- Impacts of increasing population.
- Lack of jobs in the area
- Environmental impacts of the development which was considered would amount to sprawl detracting from the village as it currently exists.
- Site is in the green belt and that the NPPF restricted development on the green-belt.
- Loss of high grade agricultural land.
- It was considered that new large scale developments were often substandard and recent developments were of poor design quality.
- Parking is difficult around the shops, supermarkets and public car parks
- Impact on drainage, particularly given existing problems reported on Caister Road near Tesco.
- Space reserved for infrastructure on the site would eventually be lost to housing.
- Questioned how a newly located village hall which would not be in the village would work.
- Light pollution
- Impact on setting of Caister Castle.

Respondents also raised a number of suggestions:

- It was suggested that development on the southwest corner of the field would be less severe.
- It was suggested that the policy should require an environmental study. It was suggested a green belt should be designated around Caister and that the new development should form a new settlement.

- It was suggested that the developers could provide integral swift and bat nesting boxes, eaves suitable to encourage house martins, native tree planting, retention of all hedgerows and the creation of wildflower areas, and ponds.
- It was suggested that there were plenty of sites in Great Yarmouth which would more appropriately accommodate the development.
- It was suggested that the development needs to be bus accessible.
- It was questioned whether the road could be dualled.
- It was suggested that a higher level of affordable housing was necessary on the site.

How these comments were taken into account

The policy has been carried forward into the final draft plan.

Reference was added to the policy for a flood risk assessment and provision of sustainable drainage systems to address concerns raised by Anglian Water.

A heritage impact assessment was commissioned to assess the impact of the site on the setting of Caister Castle and other nearby Heritage Assets. However only limited mitigation was deemed necessary.

Reference to net biodiversity gain was removed and instead the policy includes reference to meeting net biodiversity gain in supporting text to emerging GI/Biodiversity Policy to provide plan-wide coverage of requirement.

All planning obligation contribution requirements are referenced in the policy to address concerns raised by Norfolk County Council and ensure conformity with the NPPF and NPPG which states that planning obligation requirements should be made clear in policies.

The hedgerow along Jack Chase Way should be retained where possible, acknowledging it may need to be cut back to help integrate the new development with the village and create a sense of place as referred to by Norfolk County Council as the Highway Authority.

Reference was made in the policy to a shared cycleway down both sides of Jack Chase Way and safety features to enable cycles and pedestrians to safely cross Jack Chase Way.

Evidence is being prepared as part of the Norfolk Strategic Planning Framework on needs for housing for older people. This evidence will help support the policy requirement to address Persimmon Homes' concerns but it is fair to say that there has been a shortage of new housing for older people delivered in the borough in recent years.

The restriction of rear-parking courts was amended slightly to create more flexibility to ensure a mixture of parking solutions can be provided to ensure road safety and avoid car dominated layouts.

The reference to connections to existing footpaths was considered necessary as there are public footpaths to the south of the site which connect the village to Caister Castle.

The requirement for a replacement village hall was removed from the policy. However, there could still be scope for a community facility on the local centre site.

The approach to receiving S.106 contributions towards healthcare was refined following further discussions with the STP.

An indicative masterplan was included within supporting text to provide further clarity on site layout and provision of on-site infrastructure.

In terms of concerns about traffic impacts, there was no objection from the Highway Authority to the proposed allocation. It was considered that a transport assessment at the planning application stage will be sufficient to assess impacts and identify any necessary mitigation if required. It is considered that with additional junctions, Jack Chase Way will still be a preferable route for most motorists.

A footbridge connection would not be supported. The Highway Authority would also not be supportive of a footbridge. A footbridge would require a very long access ramp to ensure it is DDA (disability) compliant. This would therefore not create a direct link and extend walking and cycling distance significantly. This would have the effect of reducing people's propensity to walk or cycle or lead to people crossing the road beneath the bridge, potentially creating a road safety issue.

Consultation with the highway authority indicated that it is not possible to achieve a further access from the roundabout to the south of the site. Therefore it is necessary to have two accesses to the site from Jack Chase Way.

The Environment Agency advised that there is capacity at Caister Water Recycling Centre to accommodate the growth proposed across the Borough with sufficient headroom within the existing permit. Anglian Water had not raised any objection to the level of growth proposed. With respect to current odour issues arising from the Waste Water Recycling Centre, the Council (Environmental Services) has started enforcement action against Anglian Water which requires Anglian Water to address the issue by 1st April 2020.

In terms of impact on local infrastructure, the Council has been liaising with infrastructure providers including the NHS Norfolk and Waveney and Norfolk County Council. The developer will be expected to provide land for a new primary school and a new health centre. The developer will also be expected to provide contributions towards the development of new facilities and this was made clearer in the policy. The NHS Norfolk and Waveney have not raised any objections to the allocation and support the requirements for the provision of land and contributions. Norfolk County Council as the education authority had not raised any objection and supported the requirement for the provision of a new primary school on the site. A local centre will also be required on the site which will likely include a convenience store and potentially some small employment units. This range of services and facilities should help reduce the need to travel for some day-to-day needs.

Approximately half of the site is grade 1 agricultural land with the remainder grade 3 observing the 1:250,000 maps. The post 1988 map indicates that the lower half of the site may be grade 2 rather than grade 3. However, large parts of the Borough comprise grade 1 and grade 2 agricultural land meaning that there are very few alternative options which would result in less high grade agricultural land being developed. The site is not within the Green Belt, there is no Green Belt in Norfolk and the NPPF is not supportive of the establishment of new Green Belts. The site is greenfield, undeveloped land; however, to meet development needs across the Borough, some greenfield land will be needed for development.

With respect to concerns about design, the design policies have been strengthened and reference has been made to the new National Design Guide.

The Local Lead Flood Authority had raised no concerns about drainage. Sustainable drainage systems would be required on the site to deal with surface water and ensure flood risk is not increased. According to the Strategic Flood Risk Assessment the soils on the site are a partly sand and gravel which is suitable for infiltration of surface water and partly diamicton which is more

variable. A site-specific flood risk assessment would be required which will assess this in more detail and identify any mitigation.

With regard to concerns about an asserted lack of jobs, there is expected to be an increase in employment in Borough associated with the offshore renewables and related sectors. To support these industries, the Local Plan Part 2 protects and encourages sites for offshore energy and port-related activity, and promotes a sustainable year-round tourism industry. It is also worth noting that the population is aging, and this will increase the proportion of residents above the working age. Existing residents retiring may free up employment opportunities for others seeking work within the Borough. In addition, those migrating into the Borough at pensionable age will not be seeking employment opportunities. Therefore, the demand for housing does not automatically match the demand for employment in immediate local areas.

Issues with respect light pollution will be addressed at the planning application stage. Policy CS9 of the Core Strategy requires light pollution to be taken into account and the emerging housing design policy also requires lighting consistent with 'dark skies'

An Environmental Impact Assessment will be required to support any planning application on the site.

Design policies and biodiversity policies will encourage developers to consider installing features to promote biodiversity.

The affordable housing requirement is set out in the adopted Core Strategy. There is no evidence to suggest this should be reviewed.

Dualling the road is not necessary to support the development of the site (and therefore could not be justified), would unlikely to be viable to be funded by the development in any case

ADA6 West of Potters, Hopton-on-Sea (Policy HP2 in Reg 19 Version)

Comments Summary

Statutory consultee

Hopton Parish Council – Expressed concern over increased traffic flow through Hopton and through Longfullans Lane. Also that development at the Broadland Sands Holiday Park will increase traffic flow down Longfullans Lane and that the road requires widening.

Norfolk Wildlife Trust - Stated that reference to biodiversity net gain should be made in all the draft allocations.

Historic England - Noted that impact of development at this location should be limited on nearby Grade II* listed Old St Margaret's church.

Lead Local Flood Authority - Noted that there are few or little constraints, there is minor surface water ponding on site. Standard information would be required at planning application stage.

Norfolk County Council Transport – Raised no objection subject to:

- Submission of Transport Statement and implementation of any agreed highway mitigation measures.
- Provision of 2.0m wide footway at Coast Road frontage, to link with existing facility. Access to be provided at Coast Road with visibility in accordance with MfS.

- Improvement of Longfulans Lane to a minimum width of 6.0m for extent of site.
Improvement of Longfulans Lane junction with Coast Road.
- Development to have an active frontage at the highway to develop a sense of place and encourage reduced vehicle speeds.
- g) Pedestrian/cycle links to be provided to site to west - Planning Ref 06/17/0339/O refers.
- Proposed policy 1. ii) Not required - Longfulans Lane to be improved rather than routing traffic through a residential area.

Norfolk County Council – Made reference to NCC requirements for infrastructure in line with up to date NCC standards.

Anglian Water Recommended that the policy is amended to include the submission of a site specific flood risk assessment and also the submission of sustainable drainage measures and the future management of SUDS. Also noted ,there is an existing rising main (pressurised sewer) located on the site and the site layout should be designed to take this into account.

Other Consultees

East Coast Hospice - Section 106 contributions are required from larger development to provide a hospice which East Coast Hospice has planning permission for as Great Yarmouth and Waveney

How these comments were taken into account

The policy has been carried forward into the final draft plan.

The policy already seeks the improvement of Longfullans Lane to mitigate additional increases in traffic from future development. The policy requirement for a 'bypassing' of Longfullans lane has been removed from the policy following the highway authorities comments.

In terms of biodiversity net gain it is considered that as this will soon apply to all developments through the Environment Bill, therefore reference to meeting net biodiversity gain has been made in supporting text to Policy GSP6 and E4 to provide plan-wide coverage of requirement. A requirement was also added to the policy to reference Policy H4 and the open space which would be required on site.

Historic England had raised the significance of the Grade II* listed church, however this is some distance from the site with modern residential development between the site and the church therefore it was viewed as highly unlikely that development will impact upon the significance of the setting of the church, therefore there was no reason to acknowledge this in the policy.

Anglian Water had made recommendations for further points on flooding to be reflected in policy criteria which is recommended to be added to the policy.

The policy was amended to reference likely planning obligation requirements are made in the policy.

The comments from NCC transport were taken forward in the policy, with regard to emerging policy HP1-dp which seeks the improvement of Longfullans lane.

The approach to receiving S.106 contributions towards healthcare was refined following further discussions with NHS partners.

ADA7 North of Barton Way, Ormesby St Margaret (Policy OT2 in Reg 19 Version)

Comments Summary

Statutory Consultees

Natural England – Supported the inclusion of a requirement for a project level Habitats Regulations Assessment.

Historic England – Requested that the policy be strengthened with respect to protecting the setting of Grade II Duncan Hall School.

Anglian Water – Were generally supportive of policy but recommended amendments to separate policy requirements for flood risk assessment, provision of SuDS and their future maintenance and foul drainage strategy to emphasise their individual importance. It was reiterated that the site layout should take account of the existing rising water main and expand in the supporting text its accommodation e.g. not under back gardens/private spaces but consider highway or public open space.

Norfolk County Council (Highways Authority) – Raised fundamental concerns due to the feasibility of achieving a suitable highway access due to uncertainty over third-party land and practicability of achieving the access. Noted the need for a transport statement. Stated that Barton Way would need to be widened to 5.5 metres over its entire length.

Norfolk County Council (LLFA) – Indicated that there were few or no constraints, with only minor surface water ponding apparent on the site.

Norfolk County Council (Infrastructure & Growth) – Supported the requirement for NCC planning obligations within the allocation and that supporting text should be expanded to referenced infrastructure being provided in a timely manner.

Other Consultees

Norfolk Wildlife Trust – Supported reference to net biodiversity in proposed allocation but suggests this be applied to all allocations and required of all developments as a plan wide policy.

Water Management Alliance -They noted that the site is close to the IDB are therefore any proposed discharge of surface water or treated foul water to watercourse within IDB would require consent under Land Drainage Act.

Site Promoter – Supported the allocation noting that the site, with current available evidence (highways and utilities) could accommodate up to 100 dwellings. They suggested that a first phase could accommodate 30 dwellings, the second phase a further 70 dwellings.

Alternative Promoted Sites –

- Site at Yarmouth Way (site no.124) was considered to have demonstrable access via Foster Way which would release the site from its identified delivery constraint and could be considered an appropriate alternative site to the proposed allocation.
- Site south/east of 48 Yarmouth Road (site no.446&447) resubmitted by partly amalgamating two sites to create larger development area to avoid further ribbon development. This was previously identified as a negative effect of the site. Promoter considers the larger sites as being able to provide a dual outlet alongside Site 436 (to the west).

- Site west/south of 22 Yarmouth Road (site no. 436&446) resubmitted by partly amalgamating two sites to create larger development area to avoid further ribbon development. This was previously identified as a negative effect of the site. Promoter considers the larger sites as being able to provide a dual outlet alongside Site 446 (to east).

How these comments were taken into account

The policy has been carried forward into the final draft plan.

The policy has been amended to make reference to the need to widen Barton Way. The site promoter has confirmed that the potential ransom strip of land is in the site owners ownership, therefore, this will not prevent development taking place.

The supporting text was amended to make reference to the need to protect the setting of nearby listed building.

The requirement for site-specific Flood Risk Assessment, sustainable drainage measures and foul drainage strategy was separated for greater clarity in the allocation. As well as expanded criteria 3 to reference pipeline easement and further in supporting text as per representation.

Reference to meeting net biodiversity gain was removed to be provided in the supporting text to emerging GI/Biodiversity Policy to provide plan-wide coverage of requirement.

Alternative sites –

Site 124 – has demonstrated access arrangements and has merit as an alternative site. Not as preferably located to access services and facilities such as primary school – which the allocations are.

Sites 436, 446, 447 – do not integrate well into the settlement with a lack of development along the southern-side of Yarmouth Road. Distant from local services and facilities in comparison to alternative sites.

Alternative site suggestions remain unallocated having judged the opportunities and constraints, and with a substantial buffer of over 30% provision over the housing need, there is no need for additional housing in Ormesby St Margaret.

ADA8 North of Hemsby Road, Martham (Policy MA1 in Reg 19 Version)

Comments Summary

Statutory Consultees

Norfolk County Council - Lead Local Flood Authority – Noted there were few constraints, development should be avoided in the areas of surface water ponding in the west of the site.

Natural England - Stated that a project level HRA is required.

Historic England -Suggested a change to the policy wording to include reference to the adjacent Conservation Area and the requirement to ‘conserve and where opportunities arise enhance the Martham Conservation Area and its setting’. Historic England also welcomed criterion 5 regarding a heritage statement and archaeological requirements

Norfolk County Council Transport – Had no objection to the allocation subject to the submission of Transport Assessment (TA) and implementation of any agreed highway mitigation measures. They added the assessment should include a comprehensive walk to school assessment, including an assessment of whether Back Lane South should be closed to motor vehicles. They stated that access to be from Hemsby Road with the 30mph speed limit to be extended eastwards to include site

extent. The frontage footway to be improved to 2.0m minimum width. They stated that development layout to include an active frontage at Hemsby Road to develop a sense of place and encourage reduced vehicle speeds. Also requested, a highway link to the Persimmon development to the north west and provide a connection to Back Street if possible.

Norfolk County Council – Stated that all allocations should make appropriate contributions to NCC infrastructure and services in line with most up to date planning obligations standards.

Anglian Water – Were supportive of policy. They recommended that point 3 is amended to separate the submission of a site specific flood risk assessment and that the submission of sustainable drainage measures and the future management of SUDS should be set as a separate stand alone sub-point.

Other Consultees

Water management alliance - Acknowledgement that if there is discharge of surface or treated foul water to a watercourse then their consent would be required.

Site promoter- Commented stating the following amendments to the site allocation should be made:

- The area of open space to the east of the site should be incorporated into the site
- The residential capacity of the site should be increased from 108 to 130
- The land for commercial use is no longer viable therefore this element of land should be included in area for residential.

How these comments were taken into account

The policy has been carried forward into the final draft plan.

The Water Management Alliance have informed any discharge of foul or surface water then this would require consent. This comment is acknowledged but not required in the policy or supporting text.

The Lead Local Flood Authority have noted constraints with surface water ponding to the west of the site, the site-specific flood risk assessment will need to address this.

Natural England commented that a project level HRA will be required. This is noted but is not necessary to add to the policy as all residential developments in the Borough require an HRA.

The policy was amended to include reference to the conservation area as per Historic England's comments.

The policy was amended to reflect the detailed requirements that were suggested by Norfolk County Council Highways with a caveat that improvements to the footway and the active frontage along Hemsby Road do not result in the unnecessary loss of the hedgerow.

Reference to likely planning obligation requirements were added to the policy.

Anglian Water suggested that criterion 3 should be updated for clarity over flood risk and SuDS. Therefore this criterion was updated as they have suggested.

The site area remains as defined in the further focused changes to alleviate any confusion as to whether the woodland should remain.

The site promoter suggested that the site can have an increased capacity of 130 dwellings rather than 108 as previously suggested as the commercial use is now no longer viable. In light of this concern that the policy was amended (as well as the redline of the site) to add a criteria that the commercial element will need marketing for at least 12 months and evidenced as unviable for this element of land to be released from safeguarded employment use. Also that reference was added to the supporting text regarding the density should remain at around 34 dwellings/ha as the site is grade 1 agricultural land and this density would make the most effective use of the land.

On this point, a criterion was added to allow open space to be provided offsite as to provide an appropriate density and in light of the availability of nearby open spaces to pay for their upkeep and improvement.

ADA9 North of A149 Rollesby (Policy Deleted from Reg 19 Version)

Comments Summary

Statutory Consultees

Natural England – Supported the inclusion of requirement for a project level Habitats Regulations Assessment.

Historic England – Commented that no designated heritage assets are within or close by to allocation. No objection raised.

Norfolk County Council (Highways Authority) – Indicated that a larger housing allocation would be supported were it to provide continuous frontage development towards the school along Main Road. The allocation requires a Transport Assessment and improvement/mitigation measures including appropriate visibility splays, active frontage on Main Road, pedestrian refuge island adjacent to Main Road bus stop and measures to reduce vehicle speeds.

Norfolk County Council (LLFA) – Indicated that there were few or no constraints, with only minor surface water ponding apparent on the site.

Norfolk County Council (Infrastructure & Growth) – They noted that they were working jointly with Rollesby PC to bring forward a scheme of up to 90 homes through a Rollesby Neighbourhood Plan. This would be located within the existing proposed allocation but extended along Main Road to link with the Rollesby's northern settlement cluster. They only consider the draft allocation (as proposed) as a contingency allocation in the event that the NP is unsuccessful. NCC sought reference to all appropriate planning contributions in the allocation, and expansion of supporting text to reference infrastructure delivery in a timely manner.

Anglian Water Group – Generally supportive of policy but recommends amendments to separate policy requirements for flood risk assessment, provision of SuDS and their future maintenance and foul drainage strategy to emphasise their individual importance.

Other Consultees

Norfolk Wildlife Trust – Supported reference to net biodiversity in proposed allocation but suggests this be applied to all allocations and required of all developments as a plan wide policy.

Water Management Alliance – They noted that the site is close to the IDB are therefore any proposed discharge of surface water or treated foul water to watercourse within IDB would require consent under Land Drainage Act.

How these comments were taken into account

Given that the emerging Rollesby Neighbourhood Plan seeks to allocate alternative sites for residential development and given the overall proposed over-supply of housing, the allocation is not necessary and therefore was deleted from the plan.

ADP1 - Housing Requirements for Neighbourhood Plan Areas (Policy GSP2 in Reg 19 Version)

*Comments Summary***Statutory Consultees**

Historic England - Expressed concern that it was not clear what consideration had been given to environmental capacity in allocating this distribution of growth. They had suggested reference should be added to reflect the capacity of settlements to absorb growth will be dependent on factors such as the historic and natural environment.

Norfolk County Council – Were supportive of policy in principle provided GYBC recognise the need for housing growth in villages (in particular Rollesby) and the need to remove the restriction on the number of houses that can be allocated through a NP.

How these comments were taken into account

The policy has been carried forward into the final draft plan.

Reference was made to the historic and natural environment in the supporting text as part of the consideration of ‘constraints and opportunities’. This is not, however, intended to be an exclusive list of considerations in determining the housing requirements.

Norfolk County Council had expressed concern that this policy limits neighbourhoods to the indicative housing need listed in the policy. However the policy seeks to meet government’s requirements to set indicative housing requirements for areas with designated neighbourhood plan areas. There is no 5% restriction on growth in secondary and tertiary villages – Policy CS2 states ‘approximately 5%’ and the growth can differ between settlements. The policy would not prevent NP’s to allocate above the need listed in ADP1, so long as the neighbourhood plan is in general conformity with the Core Strategy. The proposals for the neighbourhood plan at time of writing, would broadly be in conformity, particularly considering a longer plan period for the neighbourhood plan.

The effect of the policy is essentially that no extra housing is required in Neighbourhood Plan areas over and above what is proposed to be allocated in the Local Plan. However, the policy allows for more provision if supported by the Neighbourhood Plan. The policy was rewritten to more clearly and simply to demonstrate this.

ADP2 - Great Yarmouth King Street Frontage (Policy GY4 in Reg 19 Version)

*Comments Summary***Statutory Consultees**

Historic England – Though broadly supportive of policy, they sought to change reference in the policy from ‘historic’ to ‘heritage’, as well as adding ‘and their settings’ after ‘assets’. They also considered it prudent to add reference in the supporting text to the Heritage Action Zone, if it is successful.

Other Consultees

Theatres Trust – Objected on the basis that the current policy is too permissive of residential conversions and risks undermining the existing eclectic uses in the area that contributes to the cultural offer. There is a risk that businesses could be displaced or knock-on effects from residential conversion i.e. noise complaints, may compromise their future operation (contrary to NPP182). To overcome, it has been suggested that:

- The policy coverage be shrunk on the southern-most area (as this is less commercially active);
- criterion (b) requires demonstration of no realistic prospect of active commercial/retail ground floor use and no detrimental impact upon operation of surrounding uses.

Members of the Public

Generally supportive and aesthetic improvements to shop fronts considered necessary. Other comments re-confirm the plan's approach to delete the previous draft policy (GY5-dp – King Street/Regent Street Development Area) as no longer necessary or required.

How these comments were taken into account

The policy has been carried forward into the final draft plan.

Policy was updated to reference 'heritage' assets and 'and their settings' in the proposed policy wording. As well as the boundary to exclude Heritage Action Zone area but include reference to the HAZ in the supporting text to provide greater clarity on the relationship between the two.

The Plan (read as a whole) includes (emerging) Amenity policy which balances the potential impact upon amenities of existing and anticipated occupiers. The policy was amended to reinforce reference back to Amenity policy is supporting text for clarity.

The scope of the existing policy is considered appropriate. There are vacant and underutilised heritage assets in retail use along the length of King Street, particularly to the south which require degrees of intervention.

ADP4 Telecommunications (Policy I2 in Reg 19 Version)

Comments Summary

Statutory consultees

Historic England – Supported policy, particularly criterion 1 & 2.

Broads Authority – Considered it necessary to amend criteria 1 of policy to include reference setting of heritage assets and setting of the Broads.

Other consultees

MESH (Community Group) – Faster internet connections were flagged as a concern.

How these comments were taken into account

For clarity, the setting of the Broads was expanded upon in the supporting text and will reference Core Policy CS11 and emerging Landscape Policy.

ADP5 - Foul Drainage (Policy I3 in Reg 19 Version)

Comments Summary

Statutory Consultees

Environment Agency – Inclusion of a Foul Drainage policy was welcomed but its reference to the aims of the Water Framework Directive (WFD) is not expanded upon in any detail in the policy or supported text, so is undermined. Suggested that the policy should relate back to the principle aim of ‘no deterioration/ improving WFD waterbody status’ to be more effective in its implementation. The link between development pressures and impact upon foul infrastructure needs strengthening. This could be achieved by encouraging all developers to produce a foul drainage plan/strategy.

Anglian Water – Generally supportive of policy but suggest the removal of “where possible” in criteria 2 for the avoidance of doubt i.e. foul and surface water flows should always be separated.

Members of the Public

Concern was raised as to the capacity of the Caister sewerage works and odour.

How these comments were taken into account

The supporting text was amended to link back to the aims of the Water Framework Directive(WFD) i.e. no deterioration/improving WFD waterbody status, to provide correct interpretation of the policy.

The final sentence of paragraph 2 of the policy “Foul and Surface water flows should also be separated where possible” was deleted as this is essentially covered by the two sentences above.

The Environment Agency advised that there is capacity at Caister Water Recycling Centre to accommodate the growth proposed across the Borough with sufficient headroom within the existing permit. Anglian Water had not raised any objection to the level of growth proposed. With respect to current issues around odour arising from the Waste Water Recycling Centre, the Council (Environmental Services) has started enforcement action against Anglian Water which requires Anglian Water to address the issue by 1st April 2020.

PDP1 - Houses In Multiple Occupation (Policy H12 in Reg 19 Version)

Comments Summary

Statutory Consultees

Natural England

Supported the policy with recommendation to add reference into the supporting text than an increase in dwelling units would need to contribute to the habitats monitoring and mitigation strategy.

Other Consultees

No comments

How these comments were taken into account

The policy has been carried forward into the final draft plan.

For clarity the policy was amended to add reference to the need for contributions towards the habitats monitoring and mitigation strategy where there is an increase in dwelling units to the policies supporting text.

PDP2 - Amendment of Great Yarmouth Town Centre Boundary (Policy GY1 in Reg 19 Version)

Comments Summary

Statutory Consultees

No comments received.

Other consultees

Ellandi (Market Gates Operator) – Supported the policy approach which removes the Conge and Hall Quay area from within the Town Centre Boundary. This was considered broadly consistent with Ellandi's previous representation in 2018, which reduced the effective application area for the sequential test for the purpose of assessing town centre uses. Ellandi reiterated support of policy approach to include entire Market Gates Shopping Centre and car park within town centre boundary and PDP2 allocation policy.

How these comments were taken into account

Following comments on both consultations & both policies it was deemed necessary to designate a Primary Shopping Area within the Great Yarmouth Town Centre Boundary to clarify which areas of the centre would be considered for the purposes of retail sequential assessments. This area encapsulates the focused changes consultation boundary of the town centre and the original town centre boundary from the August 2018 consultation was taken forward. The Protected Shopping Frontages policy proposed in the plan was condensed slightly to reflect the changing nature of retail more widely. Responses relating to the market gates shopping centre are shown below.

PDP3 - Market Gates Shopping Centre (Policy GY2 in Reg 19 Version)

Comments Summary

Statutory Consultees

No comments received.

Other Consultees.

Ellandi (Market Gates Operator) - Ellandi fully supported the decision to include the whole of Market Gates Shopping Centre within the allocation, given the need for the centre to diversify to respond to structural changes in the retail market. However, they considered that the policy should go further to support all possible main town centre and development methods e.g. change-of-use, partial/full redevelopment of the shopping centre to explore greater opportunities for its repurposing. This could include as hotel, cinema, civic and office uses in addition to retail. It was noted that residential uses should not be discounted given their role in ensuring viability of centres and mixed use development.

It was also reiterated that improving connections between Market Place and Temple Road to regenerate the area around the bus station will be the key enabler. As such, the policy should be clear that the Council will work positively to ensure these improvements take place. The following policy amendments are encouraged:

“Land at The Market Gates Shopping Centre, as identified on the draft Policies Map, is allocated for mixed main town centre uses including retail and leisure as defined by Annex 2 of the NPPF (February 2019) as well as Class C residential uses where appropriate and as part of a mixed-use scheme. In addition, the Council will encourage development in this location that seeks to improve

linkages between Market Place and Temple Road and will work positively with key stakeholders to make improvements to the public realm / regenerate the area around the bus station”.

Ellandi did object to a policy approach which seeks to maintain ‘core frontage’ within the shopping centre, in line with the Council’s proposed Protected Shopping Frontage Policy, however they questioned the inclusion of the stretch of Market Gates/Regent Road within this protected frontage as it is already comprised of a wider mix of uses.

Pleasure & Leisure (Albert Jones) – The consultee considered that the inclusion of a new cinema within the proposed Market Gates mixed-use allocation would be contradictory to the supporting text in PDP4 (removal of King Street Development Area) as it is stated that there is only limited demand for a cinema in Great Yarmouth. Furthermore the consultee considers it unclear how the proposal could be applied under Policy CS8 (Core Strategy) when it has already been used as the basis for permitting the cinema use at the Edge. In this respect it is unjustified.

The consultee also questioned the potential effect upon the town centre’s vitality and viability if a new cinema was located within the Market Gates Shopping Centre, suggesting that this might dilute its retail role within the town centre.

How these comments were taken into account

The policy has been carried forward into the final draft plan.

The Policy is not considered contradictory in its approach. Policy PDP4 deals with the proposed removal of former draft policy GY5 (King Street Development Area) that was previously consulted in 2018. This policy viz. location of a new cinema - was deleted because the land uses proposed in this area had changed i.e. contraction of town centre, and the proposed cinema use was considered better placed/suitable within the area around and within the Market Gates Shopping Centre.

Whilst Policy CS8 seeks to support new high-quality tourist/leisure and evening/night time uses, it does not limit the type or amount which may come forward. CS8 is reasonably open and flexible to allow for changes in the market for type and demand. The representation is erroneous in that it implies that the approval of the ‘Edge’ (and associated facilities including a cinema) fulfilled a specific and time limited requirement in Policy CS8.

The policy recognises the key anchor role that Market Gates Shopping Centre performs in the town centre and seeks to protect the core frontages from being diluted away from A1 uses, whilst allowing the remainder of the shopping centre to respond flexibly to market changes in the town centre.

PDP4-King Street/Regent Street Development Area (Policy GY4 in Reg 19 Version)

Comments Summary

Statutory Consultees

No comments received.

Other Consultees

Pleasure & Leisure (Albert Jones) Supports the deletion of this policy as is no longer necessary or required.

How these comments were taken into account

The policy was deleted as recommended in the draft document.

PDP6 - Beacon Park District Centre (Policy BL2 in Reg 19 Version)

Comments Summary

Summary of comments

Statutory Consultees

Highways England – Commented on the potential that particular proposed allocations (including PDP6/BL1) have potential to impact upon A47 trunk road and roundabouts. It was recommended that further information on the likely transport impact and any indicative mitigation measures be identified and referenced in the supporting Infrastructure Plan.

Anglian Water Group – Generally supportive of policy but recommends amendments to separate policy requirements for flood risk assessment and provision and design of sustainable drainage systems to emphasise their individual importance.

Other Consultees

Ellandi (Market Gates Operator) – Do not object (in principle) to the allocation of the proposed district centre, but raised concern that policy as written leaves open the theoretical possibility that the scale of retail development coming forward could be far greater than envisaged by the Council. Recommended an additional policy criteria to clarify that retail and other town centre uses proposed should not be of nature/scale which would prejudice the vitality/viability of Great Yarmouth Town Centre.

MESH Board (Community Group) – Reiterated needs for community centre and recreation grounds to adequately serve existing and new residents in the local area.

How these comments were taken into account

The policy has been carried forward into the final draft plan.

Further transport modelling work to be undertaken to assess the impact of the proposed allocations on the strategic road network. No mitigation measures were required because of this, therefore no change was made to the policy.

The policy was amended to include reference to requiring a site-specific Flood Risk Assessment and seeking sustainable drainage measures.

Following the advice of the Council's Property Service, the proposed district centre boundary and policy was amended to reflect the aspirations of the allocation. The policy wording will also be simplified by:

- Removing reference to educational facilities
- Combining the remaining uses proposed within the total area of the allocation
- Reference to "Retail (particularly food and beverage" changed to "A3, A4 & A5 uses")

The policy was amended to clarify that new development proposed in the district centre will only be considered where it is of a scale and nature relevant to its position within the retail hierarchy.

PDP7 - Land North of The Street, Runham (Western Element)

Comments Summary

Statutory Consultees

No Comments

Other Consultees

Members of the Public

One member of the public objected to the deletion of the allocation stating the village will miss out on affordable housing, car parking space and improved bowling green provision.

A number of people supported the deletion of the allocation stating the following reasons:

- development would have increased private car use,
- Highway Authority concerns,
- there is a lack of services,
- no need for a second bowling green given existing green and lack of funding for new facility,
- refused on several occasions including by a Planning Inspector.

How these comments were taken into account

Runham lacks services and facilities to serve residents. The site is no longer required given the proposed substantial buffer of over 30% provision over the housing need in the emerging plan. A bowling green already exists in the village and there is insufficient evidence to suggest that the existing facility does not meet the current needs given the size of the settlement.

Therefore no change was made and the policies were deleted.

PDP8 -Strategic Gaps Between Settlements (Policy GSP3 in Reg 19 Version)

Comments Summary

Statutory Consultees

Norfolk Wildlife Trust support the inclusion of this policy along with Historic England and East Suffolk Council.

Norfolk County Council support principle of Strategic Gap but with flexibility to allow development to the south of Longfullans Lane in Hopton to facilitate the improvement of the road.

Other Consultees

No comments

How these comments were taken into account

The policy has been carried forward into the final draft plan.

The Additional Strategic Gap Policy is supported in principle by all respondents. However Norfolk County Council state development to the south of Longfullans Lane is necessary to facilitate its improvement. However, the planning permission to the north of Longfullans Lane (06/17/0339/O) with adjacent draft allocation ADA6 will seek contributions and land if necessary to improve the road. Therefore no change is made to the policy text, however, as per previous recommendations to the Strategic Gaps Policy the reference on the map is seen to be confusing therefore, the references on the policies map are removed to avoid being overly prescriptive on where may suggest coalescence of settlements.

PDP9 - Vehicle Parking For Developments (Policy I1 in Reg 19 Version)

Comments Summary

Statutory consultees

No comments

Other Consultees

Bourne Leisure - Endorsed the approach to actively encourage electric car charging points on all new developments. However, stated that a flexible approach is required when applying proposed standards to tourist accommodation.

Norfolk County Council NPS - supported the use of Norfolk County Council parking standards for new development.

How these comments were taken into account

The policy has been carried forward into the final draft plan.

The policy uses the phrase encourage rather than require and therefore has inherent flexibility within it. It should be noted that the Government has recently consulted on changes to Building Regulations which will require charge points for new developments. This may reduce the need for the policy but given that these are not yet confirmed it is considered necessary to retain the policy. No changes were made to the policy.

Appendix A – Alternative Sites

Filby and Ormesby

Comments Summary

Statutory Consultee

No comments received

Other Consultees

General Public - Identified other alternatively considered sites as being preferential or more acceptable for development than proposed allocation(s) including:

- Site 435 (Ormesby St Margaret) – 149 units
- Site 10 (Filby) – 60 units, though a smaller development would be acceptable

How these comments were taken into account

The sites were appraised as alternative sites for allocation. Sites 10 and 435 are not preferably considered in comparison to the selected allocations. Neither site is well located to access local services and facilities. The Filby settlement is already quite fragmented and further development of its eastern periphery will compound the disbursement of the village. There is little built form of the settlement south of Yarmouth Road in Ormesby.

The plan as a whole provides a substantial buffer of over 30% on top of meeting the housing need, therefore no additional sites are required.

Fleggburgh

Comments Summary

Statutory Consultees

No comments

Other Consultees

Site promoter suggested consideration of site for allocation at Tower Road, Fleggburgh. A development of up to 75 dwellings and open space which could be developed within 5 years.

How these comments were taken into account

Site had already been considered as an alternative site (Site 119), and was not considered to be preferable to other sites. Currently isolated along Tower Road, with the exception of the existing farm, significant development built and permitted in Fleggburgh results in no requirement for additional housing (to be consistent with Policy CS2 – with status as a Secondary Village) and overall with a substantial buffer in provision of over 30% above the housing need. Therefore no change was made to the plan.

Fritton

Comments Summary

Statutory Consultees

No comments

Other Consultees

2 Site promoters of previously considered sites:

- New Road, Fritton (Site 411) for tourism/leisure uses
- South of A143, Fritton (Site 441) for 10 homes

How these comments were taken into account

Each site was appraised. The site at New Road (411) would extend ribbon development along a narrow track and the proposed small-scale tourist use may be better considered through the planning application process, as opposed to allocation. The site south of the A143 (Site 441) is not well located on the southern side of the main road, opposite the New Road junction, and lacking a footpath or crossing opportunity. On balance therefore, both sites were not considered appropriate for allocation either as a replacement for the current selected allocations or as additional sites given the substantial buffer of 36% housing provision over the housing need, and identified tourism and leisure areas. Therefore no change was made to the plan.

Hemsby

Comments Summary

Statutory Consultees

No Comments

Other Consultees

General Public (Site Promoter) – New site east of Scratby Road, providing 40-60 houses. Northern section of site has resolution to grant planning permission, though larger (as submitted) site should be considered which extends further south to Scratby Road to meet housing requirements and choice. It was suggested that a robust housing trajectory should be underpinned by mixture of sites

to account for different markets and timescale for delivery. Concern of over reliance upon some of the larger proposed allocations risk overall plan delivery e.g. site constraints/developer track record (Cromer Road – Ormesby St Margaret), access/traffic (Barton Way – Ormesby St Margaret).

How these comments were taken into account

The new site was appraised as an alternative to the site allocations. No sites are allocated in Scratby, with a number of completions and permissions making a significant contribution to Secondary and Tertiary village housing growth. The site is dependent upon the development of the northern section to be contiguous with the settlement and provide vehicular access (which may not be sufficient or desirable to serve the quantum of development). Notwithstanding these site specific points, the plan as a whole provides a substantial buffer of over 30% on top of meeting the housing need, therefore no additional housing from this site is necessary. Therefore no change was made to the plan.